

FILED BY ks D.C.
Jul 12, 2021
ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - miami

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 18-CR-20685-WILLIAMS(s)(s)
18 U.S.C. § 1956(h)
18 U.S.C. § 1957
18 U.S.C. § 982(a)(1)

UNITED STATES OF AMERICA

vs.

CARMELO ANTONIO URDANETA AQUI,

Defendant.

_____ /

SECOND SUPERSEDING INFORMATION

The United States charges that:

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

Beginning in or around 2012, and continuing through in or around 2017, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

CARMELO ANTONIO URDANETA AQUI,

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))

The allegations of this Second Superseding Information are re-alleged 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, **CARMELO ANTONIO URDANETA AQUI**, has an interest.

Upon conviction of a violation of Title 18, United States Code, Section 1956(h), as alleged in this Second Superseding Information, the defendant shall forfeit to the United States of America 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).

The property subject to forfeiture as a result of the alleged offense includes, but is not limited to, the following:

- i. Real property located at 18555 Collins Avenue, Unit 2205, Sunny Isles Beach, Florida 33160, UNITED STATES;
- ii. Real property located at 225 27th Street, Apt. A, Miami Beach, Florida 33140, UNITED STATES;
- iii. Real property located at 225 27th Street, Apts. B-F, Miami Beach, Florida 33140, UNITED STATES; and

- iv. All assets on deposit in account number CH3008609106086470003 at Banca Zarattini & Co. in Lugano, SWITZERLAND held in the name of Ville Flor Holding SA.

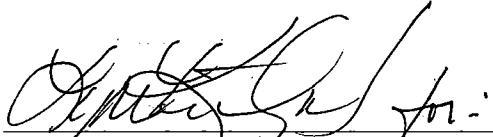
In addition, the property subject to forfeiture as a result of the alleged offense includes, but is not limited to, a sum of \$49,265,050.85 in U.S. currency, which sum represents the value of the property involved in the offense of conviction that the defendant obtained in accounts he controlled and may be sought as a forfeiture money judgment.

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).



JUAN ANTONIO GONZALEZ
ACTING UNITED STATES ATTORNEY



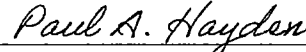
DANIEL S. KAHN
ACTING CHIEF, FRAUD SECTION
CRIMINAL DIVISION
DEPARTMENT OF JUSTICE

BY:



KURT LUNKENHEIMER
ASSISTANT UNITED STATES ATTORNEY

BY:



PAUL A. HAYDEN
TRIAL ATTORNEY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

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

v.
CARMELO ANTONIO URDANETA AQUI,

CERTIFICATE OF TRIAL ATTORNEY*

Superseding Case Information:

Defendant/

Court Division: (Select One)

- Miami Key West FTL
- WPB FTP

New defendant(s) Yes No

Number of new defendants _____

Total number of counts 1

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)
- I 0 to 5 days
 - II 6 to 10 days
 - III 11 to 20 days
 - IV 21 to 60 days
 - V 61 days and over

- (Check only one)
- Petty
 - Minor
 - Misdemeanor
 - Felony

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

If yes: Judge Kathleen M. Williams Case No. 18-CR-20685-WILLIAMS

(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) _____

7. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to August 9, 2013 (Mag. Judge Alicia O. Valle)? (Yes or No) No
8. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)? (Yes or No) No
9. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss)? (Yes or No) No



KURT LUNKENHEIMER
Assistant United States Attorney
Court ID No. A5501535

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: Carmelo Antonio Urdaneta Aqui

Case No: 18-CR-20685-WILLIAMS(s)(s)

Count #1:

Conspiracy to Commit Money Laundering

Title 18, United States Code, Sections 1956(h) and 1957

***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.)

Carmelo Antonio Urdaneta Aqui,)

Defendant)

Case No. 18-CR-20685-WILLIAMS(s)(s)

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: July 09, 2021

Defendant's signature

Martin De Luca

Signature of defendant's attorney

MARTIN DE LUCA, ESQ.

Printed name of defendant's attorney

Judge's signature

Judge's printed name and title