

Apr 9, 2018

STEVEN M. LARIMORE  
CLERK U.S. DIST. CT.  
S.D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
**18-20276-CR-MORENO/LOUIS**  
CASE NO. \_\_\_\_\_

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

UNITED STATES OF AMERICA

v.

EGBERT YVAN FERDINAND KOOLMAN,

Defendant.

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**INFORMATION**

The United States Department of Justice, Criminal Division, Fraud Section, and the United States Attorney for the Southern District of Florida charge that:

**CONSPIRACY TO COMMIT MONEY LAUNDERING**  
**(18 U.S.C. § 1956(h))**

Beginning in or around November 2005 and continuing through in or around May 2016, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**EGBERT YVAN FERDINAND KOOLMAN,**

did knowingly and willfully combine, conspire, confederate, and agree with others, known and unknown, to the United States, to violate Title 18, United States Code, Section 1956, that is, to transport, transmit and transfer a monetary instrument and funds from a place in the United States to and through a place outside the United States with the intent to promote the carrying on of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(2)(A).

It is further alleged that the specified unlawful activity is: (a) violation of the Foreign

Corrupt Practices Act ("FCPA"), in violation of Title 15, United States Code, Section 78dd-2; and (b) wire fraud, in violation of Title 18, United States Code, Section 1343.

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

**FORFEITURE**  
**(18 U.S.C. § 982(a)(1))**

1. The allegations contained in this Information are re-alleged and incorporated by reference as though fully set forth herein for the purpose of alleging forfeiture to the United States of certain property in which the defendant, **EGBERT YVAN FERDINAND KOOLMAN**, has an interest.

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

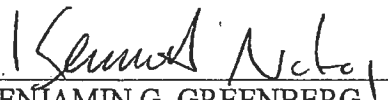
3. If any property subject to forfeiture, as a result of any act or omission of the defendant, **EGBERT YVAN FERDINAND KOOLMAN**,


- 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,

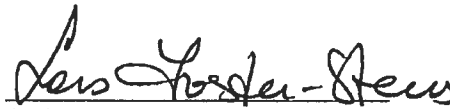
the United States shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).

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).

SANDRA MOSER  
ACTING CHIEF, FRAUD SECTION  
Criminal Division  
U.S. Department of Justice

  
BENJAMIN G. GREENBERG  
UNITED STATES ATTORNEY  
Southern District of Florida

By:   
JONATHAN P. ROBELL  
VANESSA SNYDER  
TRIAL ATTORNEYS  
Criminal Division  
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By:   
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99 NE 4th Street  
Miami, FL 33132  
Tel: (305) 961-9203

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO. \_\_\_\_\_

vs.

CERTIFICATE OF TRIAL ATTORNEY\*

EGBERT YVAN FERDINAND KOOLMAN,

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 \_\_\_\_\_  
Total number of counts \_\_\_\_\_

I do hereby certify that:

- 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.
- 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.
- Interpreter: (Yes or No)    No  
List language and/or dialect    English
- This case will take    0    days for the parties to try.
- Please check appropriate category and type of offense listed below:

(Check only one)

(Check only one)

I    0 to 5 days    X  
II    6 to 10 days    \_\_\_\_\_  
III    11 to 20 days    \_\_\_\_\_  
IV    21 to 60 days    \_\_\_\_\_  
V    61 days and over    \_\_\_\_\_

Petty    \_\_\_\_\_  
Minor    \_\_\_\_\_  
Misdem.    \_\_\_\_\_  
Felony    X

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

If yes:

Judge:

Case No. \_\_\_\_\_

(Attach copy of dispositive order)

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

(Yes or No)    Yes

If yes:

Magistrate Case No.    18mj2135-SIMONTON

\_\_\_\_\_

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

8. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to September 1, 2007?    Yes \_\_\_\_\_    No X

LOIS FOSTER STEERS  
ASSISTANT UNITED STATES ATTORNEY  
FLORIDA BAR NO. 480509

\*Penalty Sheet(s) attached

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: EGBERT YVAN FERDINAND KOOLMAN

Case No: \_\_\_\_\_

Count #: 1

Conspiracy to Commit Money Laundering

Title 18, United States Code, Section 1956(h)

\*Max. Penalty: 20 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.**

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**UNITED STATES DISTRICT COURT**  
for the  
Southern District of Florida

United States of America  
v.  
EGBERT YVAN FERDINAND KOOLMAN,  
\_\_\_\_\_  
*Defendant*

)  
) 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*