

Oct 24, 2017
STEVEN M. LARIMORE
CLERK U.S. DIST. CT.
S.D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
17-20747-CR-WILLIAMS/TORRES
Case No.

18 U.S.C. § 1956(h)
18 U.S.C. § 982

UNITED STATES OF AMERICA

vs.

MARCELO REYES LOPEZ,

Defendant.

_____ /

INDICTMENT

The Grand Jury charges that:

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

Beginning in or around 2013, through in or around at least May 2016, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

MARCELO REYES LOPEZ,

did knowingly and willfully combine, conspire, confederate, and agree, with others known and unknown to the Grand Jury, to violate Title 18, United States Code, Section 1956, that is, to knowingly conduct a financial transaction affecting interstate commerce, which transaction involved the proceeds of specified unlawful activity, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, and knowing that such transaction was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

It is further alleged that the specified unlawful activities are: (i) a violation of the Foreign Corrupt Practices Act (“FCPA”), in violation of Title 15, United States Code, Section 78dd-2; and (ii) an offense against a foreign nation involving bribery of a public official in violation of foreign law, specifically the Ecuadorian Penal Code, pursuant to Title 18, United States Code, Section 1956(c)(7)(B)(iv).

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

FORFEITURE
(18 U.S.C. § 982)

1. The allegations contained in this Indictment 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, **MARCELO REYES LOPEZ**, has an interest.

2. Upon conviction of Title 18, United States Code, Section 1956, as alleged in this Indictment, the defendant, **MARCELO REYES LOPEZ**, shall forfeit to the United States any property, real or personal, that is involved in such offense, or any property traceable to such property, pursuant to Title 18, United States Code, Section 982(a)(1).

3. The property to be forfeited includes, but is not limited to, real property located at 11316 NW 79th Lane, Doral, Florida 33178.

4. 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).

A TRUE BILL,

FOREPERSON




BENJAMIN G. GREENBERG
ACTING UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF FLORIDA

By: 

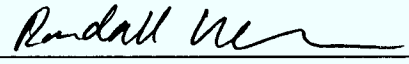
KAREN E. ROCHLIN
ASSISTANT UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF FLORIDA

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

By: 

LORINDA LARYEA, TRIAL ATTORNEY
DAVID FUHR, TRIAL ATTORNEY
CRIMINAL DIVISION, FRAUD SECTION

DEBORAH L. CONNOR, ACTING CHIEF
CRIMINAL DIVISION, MONEY LAUNDERING
& ASSET RECOVERY SECTION, U.S. DEPARTMENT OF JUSTICE

By: 

RANDALL WARDEN, TRIAL ATTORNEY
MARYANN MCCARTHY, TRIAL ATTORNEY
CRIMINAL DIVISION, MONEY LAUNDERING
& ASSET RECOVERY SECTION, U. S. DEPARTMENT OF JUSTICE

UNITED STATES OF AMERICA

CASE NO. _____

v.

CERTIFICATE OF TRIAL ATTORNEY*

MARCELO REYES LOPEZ,
Defendant.
_____ /

Superseding Case Information:

Court Division: (Select One)
 X Miami _____ Key West
_____ FTL _____ WPB _____ FTP

New Defendant(s) Yes _____ No _____
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) Yes
List language and/or dialect Spanish
- This case will take 7-10 days for the parties to try.
- Please check appropriate category and type of offense listed below:

(Check only one)


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

(Check only one)

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
 If yes: Magistrate Case No. 17-mj-3833-White
 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

- 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
- 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


 KAREN E. ROCHLIN
 ASSISTANT UNITED STATES ATTORNEY
 Court ID No. A5500050

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: MARCELO REYES LOPEZ

Case No: _____

Count #: 1

Conspiracy to Commit Money Laundering

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

***Max Penalty:** Twenty (20) years' imprisonment

Count #:

***Max Penalty:** _____

Count #:

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Count #:

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***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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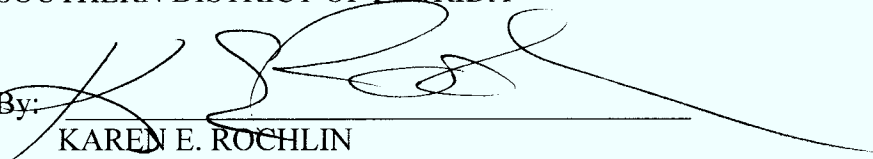
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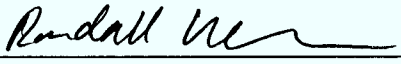

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SOUTHERN DISTRICT OF FLORIDA

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 KAREN E. ROCHLIN
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 Court ID No. A5500050

*Penalty Sheet(s) attached

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