

FILED by **KS** D.C.  
  
**Dec 7, 2021**  
  
ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S.D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
**21-60340-CR-RUIZ/STRAUSS**  
CASE NO. \_\_\_\_\_

18 U.S.C. § 1956(h)  
18 U.S.C. § 1956(a)(2)(A)  
18 U.S.C. § 1956(a)(1)(B)(i)  
18 U.S.C. § 982

UNITED STATES OF AMERICA,

v.

ARTURO CARLOS MURILLO PRIJIC,

Defendant.

\_\_\_\_\_ /

**INDICTMENT**

The Grand Jury charges that:

**COUNT 1**  
**Conspiracy to Commit Money Laundering**  
**(18 U.S.C. § 1956(h))**

From in or around October 2019 and continuing through in or around at least January 2021, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

**ARTURO CARLOS MURILLO PRIJIC,**

did knowingly and voluntarily combine, conspire, confederate, and agree with Bryan Samuel Berkman, Luis Berkman, Philip Lichtenfeld, Sergio Rodrigo Mendez Mendizabal, and other persons, known and unknown to the Grand Jury, to commit offenses defined in Title 18, United States Code, Section 1956, namely:

a. to knowingly transport, transmit, and transfer, and attempt 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, and to a place in the United States from 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); and

b. to knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, which financial transaction involved the proceeds of specified unlawful activity, knowing the property involved in the financial transaction represented the proceeds of some form of unlawful activity, and knowing that the 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 activity is:

(a) A felony violation of the Foreign Corrupt Practices Act, Title 15, United States Code, Section 78dd-2; and

(b) An offense against a foreign nation, specifically Bolivia, involving bribery of a public official, and the misappropriation, theft, and embezzlement of public funds by and for the benefit of a public official, as provided by Title 18, United States Code, Section 1956(c)(7)(B)(iv).

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

**COUNTS 2-4**  
**International Laundering of Monetary Instruments**  
**(18 U.S.C. § 1956(a)(2)(A))**

On or about the dates specified as to each Count below, in the Southern District of Florida, and elsewhere, the defendant,

**ARTURO CARLOS MURILLO PRIJIC,**

did knowingly transport, transmit, and transfer, and aid and abet and cause the transport, transmission, and transfer of, and attempt to transport, transmit, and transfer, a monetary

instrument and funds to a place in the United States from and through a place outside the United States, with the intent to promote the carrying on of specified unlawful activity, namely: (a) a felony violation of the Foreign Corrupt Practices Act, Title 15, United States Code, Section 78dd-2; and (b) an offense against a foreign nation, specifically Bolivia, involving bribery of a public official, and the misappropriation, theft, and embezzlement of public funds by and for the benefit of a public official, as provided by Title 18, United States Code, Section 1956(c)(7)(B)(iv), as set forth in each count below:

<b>Count</b>	<b>Approximate Date</b>	<b>Description of Transaction</b>
2	January 13, 2020	Wire transfer in the amount of approximately \$5,649,137 from the Central Bank of Bolivia in Bolivia to a bank account ending in 2425 at Bank 1 in the Southern District of Florida.
3	March 17, 2020	Wire transfer in the amount of approximately \$3,976,902 from the Central Bank of Bolivia in Bolivia to a bank account ending in 0506 at Bank 2 in the Southern District of Florida.
4	April 8, 2020	Wire transfer in the amount of approximately \$1,754,584 from the Central Bank of Bolivia in Bolivia to a bank account ending in 0506 at Bank 2 in the Southern District of Florida.

In violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

**COUNTS 5-8**  
**Money Laundering**  
**(18 U.S.C. § 1956(a)(1)(B)(i))**

On or about the dates set forth in each Count below, in the Southern District of Florida and elsewhere, the defendant,

**ARTURO CARLOS MURILLO PRIJIC,**

did knowingly conduct, and aid, abet, and cause others to conduct, and attempt to conduct, a financial transaction affecting interstate and foreign commerce, which transaction involved the proceeds of specified unlawful activity, knowing that the property involved in the transaction represented the proceeds of some form of unlawful activity, and knowing that the 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, as set forth in each count below:

<b>Count</b>	<b>Approximate Date</b>	<b>Description of Transaction</b>
5	April 14, 2020	Wire transfer in the amount of approximately \$450,000 from a bank account ending in 0506 at Bank 2 in the Southern District of Florida to a bank account ending in 6222 at Bank 2.
6	April 15, 2020	Wire transfer in the amount of approximately \$250,000 from a bank account ending in 0506 at Bank 2 in the Southern District of Florida to a bank account ending in 6222 at Bank 2.
7	June 5, 2020	Delivery and transfer of approximately \$140,000 in U.S. currency in a cardboard box to Bryan Samuel Berkman in Tamarac, Florida, in the Southern District of Florida.
8	June 15, 2020	Delivery and transfer of approximately \$140,000 in U.S. currency in a cardboard box to Bryan Samuel Berkman in Tamarac, Florida, in the Southern District of Florida.

It is further alleged that the specified unlawful activity was: (a) a felony violation of the Foreign Corrupt Practices Act, Title 15, United States Code, Section 78dd-2; and (b) an offense against a foreign nation, specifically Bolivia, involving bribery of a public official, and the misappropriation, theft, and embezzlement of public funds by and for the benefit of a public official, as provided by Title 18, United States Code, Section 1956(c)(7)(B)(iv).

In violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

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

1. The allegations of this Indictment are hereby 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, **ARTURO CARLOS MURILLO PRIJIC**, has an interest.

2. Upon conviction of a violation of Title 18, United States Code, Section 1956, as alleged in this Indictment, 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. The property subject to forfeiture as a result of the alleged offenses includes, but is not limited to, the following:

(i) a sum of approximately \$532,000 in U.S. currency, which sum represents the funds involved in the conspiracy and obtained by defendant.

4. If any of the 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 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).

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

*Joseph S. Beemsterboer*  
\_\_\_\_\_  
JOSEPH S. BEEMSTERBOER  
ACTING CHIEF, FRAUD SECTION  
CRIMINAL DIVISION  
U.S. DEPARTMENT OF JUSTICE

*Juan Antonio Gonzalez*  
\_\_\_\_\_  
JUAN ANTONIO GONZALEZ  
UNITED STATES ATTORNEY

*Jill Simon*  
\_\_\_\_\_  
JILL SIMON  
PETER COOCH  
TRIAL ATTORNEYS  
GERALD M. MOODY, JR.  
ASSISTANT CHIEF

*Elis Ruben*  
\_\_\_\_\_  
ELI S. RUBIN  
ASSISTANT UNITED STATES  
ATTORNEY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

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

v.

ARTURO CARLOS MURILLO PRIJIC,  
\_\_\_\_\_  
Defendant/

**CERTIFICATE OF TRIAL ATTORNEY\***  
**Superseding Case Information:**

Court Division: (Select One)

- Miami  Key West  FTL
- WPB  FTP

New defendant(s)  Yes  No

Number of new defendants \_\_\_\_\_

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

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 5 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      | <input checked="" type="checkbox"/> | Petty <input type="checkbox"/>             |
| II 6 to 10 days    | <input type="checkbox"/>            | Minor <input type="checkbox"/>             |
| III 11 to 20 days  | <input type="checkbox"/>            | Misdemeanor <input type="checkbox"/>       |
| IV 21 to 60 days   | <input type="checkbox"/>            | Felony <input checked="" type="checkbox"/> |
| V 61 days and over | <input type="checkbox"/>            |  |

6. Has this case previously been 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. 21-mj-03013-JG

Related miscellaneous numbers: \_\_\_\_\_

Defendant(s) in federal custody as of May 22, 2021

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 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** \_\_\_\_\_

Eli S. Rubin  
Assistant United States Attorney  
Court ID No. A5502535

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** ARTURO CARLOS MURILLO PRIJIC

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

Count #1:

Conspiracy to Commit Money Laundering

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

**\*Max. Penalty:** Twenty (20) Years' Imprisonment

Counts # 2-4:

International Laundering of Monetary Instruments

Title 18, United States Code, Section 1956(a)(2)(A)

**\*Max. Penalty:** Twenty (20) Years' Imprisonment

Counts # 5-8:

Money Laundering

Title 18, United States Code, Section 1956(a)(1)(B)(i)

**\*Max. Penalty:** Twenty (20) Years' Imprisonment

Count #

\_\_\_\_\_

\_\_\_\_\_

**\*Max. Penalty:** \_\_\_\_\_

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