

the defendants, and others known and unknown, would and did knowingly execute and attempt to execute a scheme and artifice to defraud financial institutions, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institutions, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344, to wit, the defendants and others provided false and fraudulent information to financial institutions to open bank accounts that they used to obtain and transfer the proceeds of fraudulent schemes, including business e-mail compromise schemes.

(Title 18, United States Code, Section 1349.)

COUNT TWO
(Conspiracy to Commit Money Laundering)

The Grand Jury further charges:

3. From in or about December 2017 up to and including in or about November 2022, in the Southern District of New York and elsewhere, ERICK JASON VICTORIA-BRITO, RENE VICTORIA RODRIGUEZ, ASHLY CAMACHO SOTO, PAUL ANTONIO LIZ, LUIS FURNIEL VASQUEZ, and ABEL RODRIGUEZ TORIBIO, the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree, together and with each other, to violate

Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 1957(a).

4. It was a part and object of the conspiracy that ERICK JASON VICTORIA-BRITO, RENE VICTORIA RODRIGUEZ, ASHLY CAMACHO SOTO, PAUL ANTONIO LIZ, LUIS FURNIEL VASQUEZ, and ABEL RODRIGUEZ TORIBIO, the defendants, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions, to wit, bank deposits, transfers, and withdrawals, represented the proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such financial transactions, which in fact involved the proceeds of specified unlawful activity, to wit, the scheme to commit bank fraud described as the object of Count One of this Indictment, knowing that the transactions were 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 the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

5. It was a further part and object of the conspiracy that ERICK JASON VICTORIA-BRITO, RENE VICTORIA RODRIGUEZ, ASHLY CAMACHO SOTO, PAUL ANTONIO LIZ, LUIS FURNIEL VASQUEZ, and ABEL RODRIGUEZ TORIBIO, the defendants, and others known and unknown, within the United States, knowingly would and did engage and attempt to engage in monetary transactions in criminally derived property of a value

greater than \$10,000 and that was derived from specified unlawful activity, to wit, the scheme to commit bank fraud described as the object of Count One of this Indictment, in violation of Title 18, United States Code, Section 1957(a).

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

FORFEITURE ALLEGATIONS

6. As a result of committing the offense alleged in Count One of this Indictment, ERICK JASON VICTORIA-BRITO, RENE VICTORIA RODRIGUEZ, ASHLY CAMACHO SOTO, PAUL ANTONIO LIZ, LUIS FURNIEL VASQUEZ, and ABEL RODRIGUEZ TORIBIO, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any and all property constituting, or derived from, proceeds the defendants obtained directly or indirectly, as a result of the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

7. As a result of committing the offense alleged in Count Two of this Indictment, ERICK JASON VICTORIA-BRITO, RENE VICTORIA RODRIGUEZ, ASHLY CAMACHO SOTO, PAUL ANTONIO LIZ, LUIS FURNIEL VASQUEZ, and ABEL RODRIGUEZ TORIBIO, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in said offense, or any property traceable to such

property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offense.

Substitute Assets Provision

8. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- 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 subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code,

Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



FOREPERSON



DAMIAN WILLIAMS
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ERICK JASON VICTORIA-BRITO,
RENE VICTORIA RODRIGUEZ,
ASHLY CAMACHO SOTO,
PAUL ANTONIO LIZ,
LUIS FURNIEL VASQUEZ, and
ABEL RODRIGUEZ TORIBIO,

Defendants.

SEALED INDICTMENT

22 Cr. ____

(18 U.S.C. §§ 1349 and 1956(h).)

DAMIAN WILLIAMS
United States Attorney

John Bellam (DFP)
Foreperson

*Filed Sealed Indictment
Arrest Warrants issued*

*KL
12/1/22*

Stewart Aarn
USMG