

Page 1 of TB D.C.

Jun 7, 2018
STEVEN M. LARIMORE
CLERK U.S. DIST. CT.
S.D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
18-60158-CR-DIMITROULEAS/SNOW
Case No. _____

18 U.S.C. § 1956(h)
18 U.S.C. § 1956(a)(1)(B)(i)
18 U.S.C. § 981(a)(1)(C)

UNITED STATES OF AMERICA

v.

PETER VINCENT CRUZ,

Defendant.

_____ /

INDICTMENT

The Grand Jury charges that:

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

From at least as early as in or around December 2016, and continuing through the date of this Indictment, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

PETER VINCENT CRUZ,

did willfully, that is, with the intent to further the object of the conspiracy, and knowingly combine, conspire, confederate, and agree with others known and unknown to the Grand Jury, to commit offenses against the United States, in violation of Title 18, United States Code, Section 1956, that is, to knowingly conduct a financial transaction affecting interstate 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 such transaction was designed in whole and in part to conceal and disguise the nature, location,

source, ownership, and 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 conspiracy to commit wire fraud, in violation of Title 18, United States Code, Section 1349, and wire fraud, in violation of Title 18, United States Code, Section 1343.

PURPOSE OF THE CONSPIRACY

1. It was the purpose of the conspiracy for the defendant and his co-conspirators to unlawfully enrich themselves, to hide illegal proceeds, and to further the wire fraud schemes by, among other things, withdrawing, depositing, and transferring fraudulently obtained funds between credit unions, banks, and individuals in the United States, and converting the fraudulently obtained funds to cash and cryptocurrency.

MANNER AND MEANS OF THE CONSPIRACY

The manner and means by which the defendant and his co-conspirators sought to accomplish the object and purpose of the conspiracy included, among others, the following:

2. Co-conspirators in Nigeria and elsewhere contacted businesses (“the business victims”) located throughout the United States, using email, social media, and other Internet-based methods of communication, and falsely and fraudulently posed as vendors seeking payment for services rendered. The co-conspirators, posing as vendors, then falsely and fraudulently directed the business victims to make payments to various bank accounts in the United States, through wire transfers, in purported satisfaction of invoices due to the actual vendors.

3. Co-conspirators used false online identities to contact individual victims (“the individual victims”), including Individual 1, in the Southern District of Florida, and elsewhere, using email, social media, online dating applications, and other Internet-based methods of communication. The co-conspirators then pursued false and fraudulent romantic relationships online with the

individual victims. Once an online relationship had been established with the individual victims, co-conspirators persuaded the individual victims to open shell companies and bank accounts, in order to receive the illicit proceeds from the business victims. Then, as soon as the business victims wired the illicit proceeds into the individual victims' bank accounts, co-conspirators directed the individual victims to wire those proceeds to various bank accounts belonging to other co-conspirators, including **PETER VINCENT CRUZ**.

4. At the direction of his co-conspirators, **PETER VINCENT CRUZ** established bank accounts at federal credit unions and banks. **CRUZ** then provided his bank account and federal credit union account information to the co-conspirators based in Nigeria and elsewhere, in order to receive the illicit proceeds from the individual victims' bank accounts.

5. Upon receipt of the illicit proceeds, **CRUZ** made cash withdrawals and outbound wire transfers to other co-conspirators.

6. As a result of the conspiracy, **PETER VINCENT CRUZ** laundered approximately \$500,000.

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

COUNTS 2-4
Money Laundering
(18 U.S.C. § 1956(a)(1)(B)(i))

On or about the dates specified below, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

PETER VINCENT CRUZ,

did knowingly conduct and attempt to conduct a financial transaction affecting interstate commerce, which financial 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 the transaction was designed, in whole and in part, to conceal and disguise

the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, as set forth below:

Count	Approximate Date	Financial Transaction
2	June 28, 2017	Transfer of approximately \$60,000 from Individual 1's Citibank account ending in 4686 in Hollywood, Florida, to PETER VINCENT CRUZ 's Denali Federal Credit Union account ending in 9253.
3	June 29, 2017	Transfer of approximately \$80,000 from Individual 1's Citibank account ending in 4686 in Hollywood, Florida, to PETER VINCENT CRUZ 's Credit Union 1 account ending in 9852.
4	June 29, 2017	Transfer of approximately \$100,000 from Individual 1's Citibank account ending in 4686 in Hollywood, Florida, to PETER VINCENT CRUZ 's Credit Union 1 account ending in 9852.

It is further alleged that the specified unlawful activity is conspiracy to commit wire fraud, in violation of Title 18, United States Code, Section 1349, and wire fraud, in violation of Title 18, United States Code, Section 1343.

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

FORFEITURE ALLEGATIONS

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 criminal forfeiture to the United States of America of certain property in which the defendant has an interest.

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

3. If any of the property described above, 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 of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).


All pursuant to Title 18, United States Code, Section 981(a)(1)(C), as incorporated by Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 982(a)(1), and the procedures set forth at Title 21, United States Code, Section 853, as made applicable by Title 28, United States Code, Section 2461(c).

A TRUE BILL _____

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BENJAMIN G. GREENBERG
UNITED STATES ATTORNEY



LISA H. MILLER
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES OF AMERICA

CASE NO. _____

v.

CERTIFICATE OF TRIAL ATTORNEY*

PETER VINCENT CRUZ,

Defendant.

Superseding Case Information:

Court Division: (Select One)

X Miami FTL ___ Key West WPB ___ FTP

New Defendant(s) Yes ___ No ___
Number of New Defendants _____
Total number of counts _____

I do hereby certify that:

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) No
List language and/or dialect _____

4. This case will take 3-4 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	<u>X</u>	Petty	_____
II	6 to 10 days	_____	Minor	_____
III	11 to 20 days	_____	Misdem.	_____
IV	21 to 60 days	_____	Felony	<u>X</u>
V	61 days and over	_____		

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) No

If yes: Magistrate Case No. _____

Related Miscellaneous numbers: _____

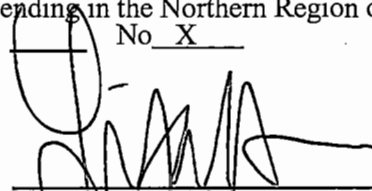
Defendant(s) in federal custody as of _____

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



LISA H. MILLER
ASSISTANT UNITED STATES ATTORNEY
COURT ID NO. A5502054

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: PETER VINCENT CRUZ

Case No: _____

Count #: 1

Conspiracy to Commit Money Laundering

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

*Max. Penalty: Twenty years' imprisonment

Counts #: 2-4

Money Laundering

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

*Max. Penalty: Twenty 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.**