

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
**20-20198-CR-KING/BECERRA**  
Case No. \_\_\_\_\_

**Sep 29, 2020**

ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S.D. OF FLA. - MIAMI

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

**UNITED STATES OF AMERICA**

**vs.**

**TRACY LEE WILLIAMS,**

**Defendant.**

**INFORMATION**

The United States Attorney charges that:

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

Beginning in or around August 2018 through in or around August 2019, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**TRACY LEE WILLIAMS,**

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 United States Attorney, to conduct a financial transaction affecting interstate and foreign 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 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 health care fraud, in violation of Title 18, United States Code, Section 1347; wire fraud, in violation of Title 18, United States Code, Section 1343; and conspiracy to commit health care fraud, in violation of Title 18, United States Code, Section 1349.

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

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

1. The allegations 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, **TRACY LEE WILLIAMS**, has an interest.

2. Upon conviction of the violation of Title 18, United States Code, Section 1956, as alleged in this Information, 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 includes, but is not limited to, a sum of approximately \$656,518 in United States currency, which represents the total amount of funds involved in the violation of Title 18, United States Code, Section 1956, alleged in this Information and which may be sought as a forfeiture money judgment.

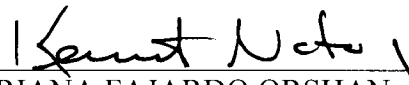
4. If any of the property subject to forfeiture, as a result of any act or omission of a defendant:

- 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

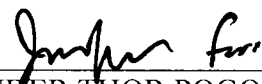
- e. has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled to the 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).

  
\_\_\_\_\_  
ARIANA FAJARDO ORSHAN  
UNITED STATES ATTORNEY  
SOUTHERN DISTRICT OF FLORIDA

DANIEL KAHN  
ACTING CHIEF  
FRAUD SECTION, CRIMINAL DIVISION  
U.S. DEPARTMENT OF JUSTICE

  
\_\_\_\_\_  
ALEXANDER THOR POGOZELESKI  
TRIAL ATTORNEY  
CRIMINAL DIVISION, FRAUD SECTION  
U.S. DEPARTMENT OF JUSTICE

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

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

v.

**CERTIFICATE OF TRIAL ATTORNEY\***

TRACY LEE WILLIAMS,

Defendant.**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 

- 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 \_\_\_\_\_
- This case will take 0 days for the parties to try.
- Please check appropriate category and type of offense listed below:

(Check only one)

- |     |                  |                                     |
|-----|------------------|-------------------------------------|
| I   | 0 to 5 days      | <input checked="" type="checkbox"/> |
| II  | 6 to 10 days     | <input type="checkbox"/>            |
| III | 11 to 20 days    | <input type="checkbox"/>            |
| IV  | 21 to 60 days    | <input type="checkbox"/>            |
| V   | 61 days and over | <input type="checkbox"/>            |

(Check only one)

- |         |                                     |
|---------|-------------------------------------|
| Petty   | <input type="checkbox"/>            |
| Minor   | <input type="checkbox"/>            |
| Misdem. | <input type="checkbox"/>            |
| Felony  | <input checked="" type="checkbox"/> |

- 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) 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

- 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 ☐ No ☒
- 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 ☐ No ☒
- 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 ☐ No ☒

  
 DOJ TRIAL ATTORNEY

COURT ID NO. A5502549

\*Penalty Sheet(s) attached

REV 6/5/2020

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** TRACY LEE WILLIAMS

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

Count #: 1

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

Conspiracy To Commit Money Laundering

**\*Max Penalty:** Twenty (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.**

AO 455 (Rev. 01/09) Waiver of an Indictment

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UNITED STATES DISTRICT COURT  
for the  
Southern District of Florida

United States of America

v.

Tracy Lee Williams,

*Defendant*

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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*

MARC SEITLES, ESQ.  
*Printed name of defendant's attorney*

\_\_\_\_\_  
*Judge's signature*

\_\_\_\_\_  
*Judge's printed name and title*