Case 1:21-cr-20425-KMM Document 1 Entered on FLSD Docket 08/10/2021

Aug 10, 2021

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

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA 21-20425-CR-MOORE/LOUIS Case No.

18 U.S.C. § 1956(h) 18 U.S.C. § 982

UNITED STATES OF AMERICA

vs.

JULIO CESAR BETANCOURT,

Defend	lant

INFORMATION

The Acting United States Attorney charges that:

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

From on or about July 2019 through in or around October 2019, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

JULIO CESAR BETANCOURT,

did knowingly and voluntarily combine, conspire, confederate, and agree with others known and unknown to the Acting United States Attorney, to commit an offense against the United States, 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)(l)(B)(i).

It is further alleged that the specified unlawful activity is conspiracy to commit health care fraud and wire fraud, in violation of Title 18, United States Code, Section 1349, health care fraud in violation of Title 18, United States Code, Section 1347, and wire fraud, in violation of Title 18, United States Code, Section 1343.

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

FORFEITURE (18 U.S.C. § 982)

- 1. The allegations contained in this Information are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of certain property in which the defendant, **JULIO CESAR BETANCOURT**, has an interest.
- 2. Upon conviction of a violation of Title 18, United States Code, Section 1956, as alleged in this Information, the defendant shall forfeit to the United States, his interest in 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 offense includes, but is not limited to: a money judgment in the approximate amount of \$363,139.
- 4. If any of the property subject to forfeiture, 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 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).

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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 made applicable by Title 18, United States Code, Section 982(b)(1).

JUAN ANTONIO GONZALEZ

ACTING UNITED STATES ATTORNEY

TIMOTHY J. ABRAHAM

ASSISTANT UNITED STATES ATTORNEY

Case 1:21-cr-20425-KMM Document 1 Entered on FLSD Docket 08/10/2021 Page 4 of 5 UNITED STATES DISTRICT COURT

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA	CASE NO
v. JULIO CESAR BETANCOURT,	CERTIFICATE OF TRIAL ATTORNEY* Superseding Case Information:
Defendant. /	
Court Division: (Select One) ✓ Miami	New defendant(s) Yes No Number of new defendants Total number of counts
witnesses and the legal complexities of	tions of the indictment, the number of defendants, the number of probable of the Indictment/Information attached hereto.
setting their calendars and scheduling	ied on this statement will be relied upon by the Judges of this Court in 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 0 days for the	
5. Please check appropriate category and	,
(Check only one) I 0 to 5 days II 6 to 10 days III 11 to 20 days IV 21 to 60 days V 61 days and over	(Check only one) Petty
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 mat 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 matte August 9, 2013 (Mag. Judge Alicia O	r pending in the Central Region of the U.S. Attorney's Office prior to . Valle)? (Yes or No) No
Does this case originate from a matte August 8, 2014 (Mag. Judge Shaniek	r pending in the Northern Region of the U.S. Attorney's Office prior to Maynard? (Yes or No) No
9. Does this case originate from a matte	r pending in the Central Region of the U.S. Attorney's Office prior to

TIMOTHY J. ABRAHAM
Assistant United States Attorney

FLA Bar No.

114372

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: <u>JULIO CESAR BETANCOURT</u>		
Case No:		
Count # 1:		
Conspiracy to Commit Money Laundering	·	
Title 18, United States Code, Section 1956(h)		
*Max. Penalty: Twenty (20) Years' Imprisonment	٠	

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