FILED by MM D.C.
Jul 12, 2022
ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S.D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

22-20306-CR-GAYLES/TORRES

CASE NO._____

18 U.S.C. § 1956(h)
18 U.S.C. § 1956(a)(l)(B)(i)
18 U.S.C. § 982(a)

UNITED STATES OF AMERICA

v.

RALPH STEINMANN and
LUIS FERNANDO VUTEFF,

Defendants.
_____/

INDICTMENT

The Grand Jury charges that:

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

Beginning in or around December 2014, and continuing through in or around August 2018, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

RALPH STEINMANN and
LUIS FERNANDO VUTEFF,

did knowingly and voluntarily combine, conspire, confederate, and agree with each other and other persons known, to include, Francisco Convit Guruceaga, Jose Vincente Amparan Croquer, aka "Chente," Hugo Andrea Ramalho Gois, Carmelo Antonio Urdaneta Aqui, and unknown to the Grand Jury, to commit offenses defined in Title 18, United States Code, Section 1956, that is to knowingly 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 such 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)(l)(B)(i).

It is further alleged that the specified unlawful activity is: (a) a felony violation of the Foreign Corrupt Practices Act, in violation of Title 15, United States Code, Section 78dd-3, and (b) an offense against a foreign nation, specifically Venezuela, 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).

FORFEITURE ALLEGATIONS

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 either of the defendants, **RALPH STEINMANN** and **LUIS FERNANDO VUTEFF,** have an interest.

2. Upon conviction of a violation of Title 18, United States Code, Section 1956, as alleged in this Indictment, the defendants 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. If any property subject to forfeiture, as a result of any act or omission of a defendant,

(i) cannot be located upon the exercise of due diligence

(ii) has been transferred or sold to, or deposited with, a third party,

(iii) has been placed beyond the jurisdiction of the Court,

(iv) has been substantially diminished in value, or

(v) 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, Sections 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

[redacted]

FOREPERSON

JUAN ANTONIO GONZALEZ
UNITED STATES ATTORNEY

Kurt K. Lunkenheimer
Assistant United States Attorney

Lorinda I. Laryea
ACTING CHIEF, FRAUD SECTION
CRIMINAL DIVISION

Paul A. Hayden
Trial Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

v.

Ralph Steinmann and Luis Fernando Vuteff,
_____/
Defendants.

CASE NO.:

CERTIFICATE OF TRIAL ATTORNEY*

Superseding Case Information:

New Defendant(s) (Yes or No)
Number of New Defendants
Total number of New Counts

Court Division (select one)
☑ Miami ☐ Key West ☐ FTP
☐ FTL ☐ WPB

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. §3161.

3. Interpreter: (Yes or No) No
   List language and/or dialect: _____

4. This case will take 12 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	☐	Petty
II	☐ 6 to 10 days	☐	Minor
III	☑ 11 to 20 days	☐	Misdemeanor
IV	☐ 21 to 60 days	☑	Felony
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. _____
7. Has a complaint been filed in this matter? (Yes or No) Yes
   If yes, Magistrate Case No. 22-mj-02992-Otazo-Reyes
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) Yes
   If yes, Judge Williams Case No. 18-cr-20685-WILLIAMS
9. Defendant(s) in federal custody as of _____
10. Defendant(s) in state custody as of _____
11. Rule 20 from the District of
12. Is this a potential death penalty case? (Yes or No) No
13. 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
14. 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

By: _____

Kurt Lunkenheimer
Assistant United States Attorney
Court ID No. A5501535

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: Ralph Steinmann

Case No:

Count #1:

Conspiracy to Commit Money Laundering

Title 18, United States Code, 1956(h)

* **Max. Term of Imprisonment:** 20 years
* **Mandatory Min. Term of Imprisonment (if applicable):**
* **Max. Supervised Release:** 3 years
* **Max. Fine:** Not more than $250,000 or twice the value of the property involved in the transaction, whichever is greater.

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

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: Luis Fernando Vuteff

Case No:

Count #1:

Conspiracy to Commit Money Laundering

Title 18, United States Code, 1956(h)

* **Max. Term of Imprisonment:** 20 years
* **Mandatory Min. Term of Imprisonment (if applicable):**
* **Max. Supervised Release:** 3 years
* **Max. Fine:** Not more than $250,000 or twice the value of the property involved in the transaction, whichever is greater.

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