

Jun 17, 2016

STEVEN M. LARIMORE
CLERK U.S. DIST. CT.
S.D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

16-20485-CR-LENARD/GOODMAN

Case No. _____

18 U.S.C. § 1956(h)

18 U.S.C. § 982

UNITED STATES OF AMERICA

vs.

GABRIELA ALEGRIA,

Defendant.

_____ /

INFORMATION

The United States Attorney charges:

**CONSPIRACY TO COMMIT MONEY LAUNDERING
(18 U.S.C. § 1956(h))**

Beginning in or around October of 2014, and continuing through in or around May of 2015, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

GABRIELA ALEGRIA,

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 United States Attorney, to violate Title 18, United States Code, Section 1957(a), that is, to knowingly engage and attempt to engage, in a monetary transaction by, through, and to a financial institution, affecting interstate and foreign commerce, in criminally derived

property of a value greater than \$10,000, such property having been derived from a specified unlawful activity.

It is further alleged that the specified unlawful activity is conspiracy to commit health care 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 in this Information are realleged and incorporated by reference as though fully set forth herein for the purpose of alleging forfeiture to the United States of America of certain property in which **GABRIELA ALEGRIA** has an interest.

2. Upon conviction of a conspiracy to violate Title 18, United States Code, Section 1956, as alleged in this Information, the defendant, **GABRIELA ALEGRIA**, shall forfeit to the United States of America any property, real or personal, that is involved in the offense, or 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, the sum of at least \$714,340 in United States currency, which is a sum of money equal to the property involved in the offense alleged in this Information, which the United States will seek as a forfeiture money judgment as part of the defendant's sentence.

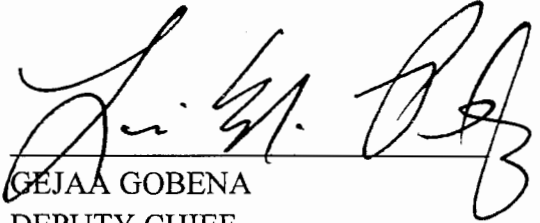
4. If any of the property described above, as a result of any act or omission of the defendant:

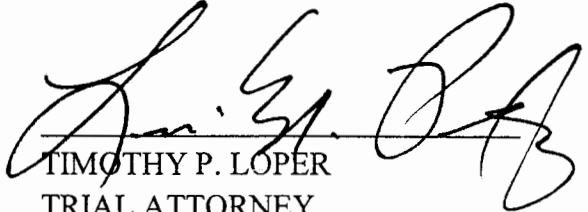
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States of America to seek 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 31, United States Code, Section 5317(c)(1).

All pursuant to Title 18, United States Code, Section 982, Title 28, United States Code, Section 2461(c), and the procedures set forth in Title 21, United States Code, Section 853.


WIFREDO A. FERRER
UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF FLORIDA


GEJAA GOBENA
DEPUTY CHIEF
CRIMINAL DIVISION, FRAUD SECTION
U.S. DEPARTMENT OF JUSTICE


TIMOTHY P. LOPER
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