

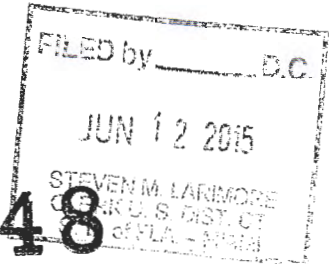
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No.

15-20448
18 U.S.C. § 1956(h)

18 U.S.C. § 982

CR-MARTINEZ



UNITED STATES OF AMERICA

/GOODMAN

vs.

JESUS MARTINEZ,

Defendant.

INFORMATION

The United States Attorney charges that:

GENERAL ALLEGATIONS

At all times material to this Information:

The Defendant and Related Companies

1. PTOT Pro, Inc. ("PTOT") was a Florida corporation, incorporated on or about September 7, 2010, that purportedly did business in Miami-Dade County, in the Southern District of Florida.

2. SASI Consulting Company ("SASI") was a Florida Corporation, incorporated on or about March 22, 2011, that purportedly did business in Miami-Dade County, in the Southern District of Florida.

3. Simalex Group Co. ("Simalex") was a Florida corporation, incorporated on or about August 16, 2011, that purportedly did business in Miami-Dade County, in the Southern District of Florida.

4. American Master Trading, LLC, ("AMT") was a Florida corporation, incorporated on or about February 25, 2011, that purportedly did business in Miami-Dade County, in the Southern District of Florida.

5. Defendant **JESUS MARTINEZ**, a resident of Miami-Dade County, was the President and registered agent of AMT.

6. Igor Iturriaga, a resident of Miami-Dade County, was the president and registered agent of PTOT and the president of Simalex.

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

From in or around October of 2011, and continuing through in or around November of 2013, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

JESUS MARTINEZ,

did willfully, that is, with the intent to further the object of the conspiracy, and knowingly combine, conspire, confederate, and agree with Igor Iturriaga, and with others known and unknown to the United States Attorney, to violate Title 18, United States Code, Section 1956(a)(1)(B)(i), that is, to knowingly conduct a financial transaction affecting interstate commerce, which 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, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity.

It is further alleged that the specified unlawful activity is payment of kickbacks in connection with a federal health care program, in violation of Title 42, United States Code,

Section 1320a-7b(b)(2)(A).

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 by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendant, **JESUS MARTINEZ**, has an interest.

2. Upon conviction of a violation of Title 18, United States Code, Section 1956(h), as charged in this Information, the defendant, **JESUS MARTINEZ**, shall forfeit to the United States (i) any property constituting or derived from any proceeds that the defendant obtained, directly or indirectly, as the result of such violation, pursuant to Title 18, United States Code, Section 982(a)(1).

3. All pursuant to Title 18, United States Code, Sections 982(a)(1), and the procedures set forth at Title 21, United States Code, Section 853.


WIFREDO A. FERRER

UNITED STATES ATTORNEY


JAMES V. HAYES

ASSISTANT UNITED STATES ATTORNEY