

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No.

17-60223

CR-UNGARO

18 U.S.C. § 1956(h)
18 U.S.C. § 1956(a)(1)(B)(i)
18 U.S.C. § 1956(a)(2)(B)(i)
18 U.S.C. § 1957
18 U.S.C. § 1341
18 U.S.C. § 1343
18 U.S.C. § 1344
18 U.S.C. § 1349
18 U.S.C. § 2
18 U.S.C. § 981
18 U.S.C. § 982

/HUNT

UNITED STATES OF AMERICA

v.

RODA TAHER,
a/k/a "Rida Taher,"
a/k/a "Reda Taher,"
a/k/a "Ressi,"
HANAN JAAFAR,
GEANNIS GONZALEZ,
ALFREDO TOVAR,
a/k/a "Neo,"
a/k/a "Geo Star,"
QUIANA VELASCO,
JOSE DANIEL ESTRELLA,
PEDRO REYES,
JAMIE VIVES CASTILLO, and
ROBINSON CASTILLO,

Defendants.

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times material to this Indictment:

Definitions

1. The terms “shell company” and “shell corporation” refer to a purported business entity incorporated under state law that does not engage in any substantial legitimate business activity, but is instead used to perpetrate or facilitate money laundering or other criminal offenses.
2. The terms “shell bank account” and “shell corporate account” refer to a bank account in the name of a shell company or shell corporation.
3. A “money mule” is a person that is recruited to incorporate a shell company and open shell bank accounts in that shell company’s name for the purpose of receiving, withdrawing, and transferring proceeds of criminal activity.
4. A “recruiter” is a person who recruits another person to become a money mule, manages that money mule, and provides the money mule with directions and instructions.

Financial Institutions

5. BankUnited, N.A. (“BankUnited”), Bank of America, N.A. (“Bank of America”), Bank Atlantic, JPMorgan Chase Bank, N.A. (“JPMorgan Chase Bank”), Citibank, N.A. (“Citibank”), Citizens Bank, N.A. (“Citizens Bank”), Morgan Stanley Bank, N.A. (“Morgan Stanley Bank”), PNC Bank, N.A. (“PNC Bank”), Regions Bank, Santander Bank, N.A. (“Santander Bank”), Sovereign Bank, SunTrust Bank, TD Bank USA, N.A. (“TD Bank”), TotalBank, Wachovia Bank, N.A. (“Wachovia”), and Wells Fargo Bank, N.A. (“Wells Fargo Bank”), were “financial institutions” as the term “financial institution” is defined in Title 18, United States Code, Section 20, whose depositors’ accounts were insured by the Federal Deposit Insurance Corporation (“FDIC”).

Defendants

6. Defendant **RODA TAHER**, a/k/a “**Rida Taher**,” a/k/a “**Reda Taher**,” a/k/a “**Ressi**” (“**TAHER**”), managed and supervised a criminal organization that engaged in money laundering and transactions in criminally derived property by utilizing money mules and recruiters in the Southern District of Florida, in other places in the United States, and in foreign countries.

7. Defendant **HANAN JAAFAR** was **TAHER**’s wife. She received criminal proceeds deposited or transferred by other members of **TAHER**’s organization into bank accounts that she maintained and further transferred some of those proceeds, at **TAHER**’s direction, to bank accounts overseas.

8. Defendant **GEANNIS GONZALEZ** was the incorporator, director, and president of shell companies Trades Generation, Inc. and Worldwide Contracts, Inc. and recruited and managed multiple money mules for **TAHER**’s organization, including Defendant **PEDRO REYES**, Defendant **ALFREDO TOVAR**, Y.M., Y.P., A.G., F.A., C.O. and A.D.L.C., among others.

9. Defendant **ALFREDO TOVAR**, a/k/a “**Neo**,” a/k/a “**Geo Star**,” was the incorporator, director, and president of shell company ATI Global Tradings, Inc. and recruited and managed multiple money mules for **TAHER**’s organization, including Defendant **QUIANA VELASCO**, V.T.M., Z.T., and S.S., among others.

10. Defendant **QUIANA VELASCO** was the incorporator, director, and president of shell company QMV Atlantic Trade, Inc. and recruited and managed multiple money mules for **TAHER**’s organization, including M.W., I.G., S.V., C.A., and V.A., among others.

11. Defendant **JOSE DANIEL ESTRELLA** was the incorporator, director, and president of shell company JE East Products, Inc. and recruited and managed multiple money mules for **TAHER**'s organization, including C.R., D.R., R.C., M.P., and M.A., among others.

12. Defendant **PEDRO REYES** was the incorporator, director, and president of shell companies RP Global Sales Inc. and RP Global Sales & Logistics, Inc. and recruited and managed multiple money mules for **TAHER**'s organization, including A.G., B.V., F.C., J.A., J.C., M.G., and S.C., among others.

13. Defendant **JAMIE VIVES CASTILLO** was the incorporator, director, and president of shell company JV Atlantic Trades, Inc. and recruited and managed multiple money mules for **TAHER**'s organization, including defendant **JOSE DANIEL ESTRELLA**, N.J., S.J., D.L., and H.S., among others.

14. Defendant **ROBINSON CASTILLO** was the incorporator, director, and president of shell company Castillo Global Tradings, Inc. and recruited and managed multiple money mules for **TAHER**'s organization, including F.G., J.P., D.U., and R.A., among others.

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

The General Allegations section of this Indictment is re-alleged and fully incorporated herein by reference.

From in or about 2008, and continuing through the date of this Indictment, at Miami-Dade and Broward Counties, in the Southern District of Florida, and elsewhere, the defendants,

RODA TAHER,
a/k/a "Rida Taher,"
a/k/a "Reda Taher,"
a/k/a "Ressi,"
HANAN JAAFAR,
GEANNIS GONZALEZ,

**ALFREDO TOVAR,
a/k/a "Neo,"
a/k/a "Geo Star,"
QUIANA VELASCO,
JOSE DANIEL ESTRELLA,
PEDRO REYES,
JAMIE VIVES CASTILLO, and
ROBINSON CASTILLO,**

did willfully, that is, with the intent to further the objects of the conspiracy, and knowingly combine, conspire, confederate, and agree with each other, and with other persons known and unknown to the Grand Jury, to commit offenses against the United States, in violation of Title 18, United States Code, Sections 1956 and 1957, that is, to:

a. knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of such specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i);

b. knowingly transport, transmit, and transfer, and attempt to transport, transmit, and transfer, a monetary instrument and funds involving the proceeds of specified unlawful activity, from a place in the United States to or through a place outside the United States, knowing that the funds involved in the transportation, transmission, and transfer represented the proceeds of some unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of such specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i); and

c. knowingly engage in a monetary transaction by, through, or 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 specified unlawful activity, in violation of Title 18, United States Code, Section 1957.

It is further alleged that the specified unlawful activity was (i) mail fraud, in violation of Title 18, United States Code, Section 1341, (ii) wire fraud, in violation of Title 18, United States Code, Section 1343, and (iii) bank fraud, in violation of Title 18, United States Code, Section 1344.

OBJECT OF THE CONSPIRACY

It was the object of the conspiracy for the defendants and their co-conspirators to unlawfully enrich themselves and others, to hide illegal proceeds, and to further the fraud schemes by, among other things, withdrawing, depositing, and conducting wire transfers of fraudulently-obtained funds between banks in the United States, and between banks in the United States and banks in foreign countries.

MANNER AND MEANS

The manner and means by which the defendants and their co-conspirators sought to accomplish the objects and purpose of the conspiracy included, among others, the following:

1. **TAHER** recruited money mules to become part of his criminal organization and directed others, including Defendants **GEANNIS GONZALEZ, ALFREDO TOVAR, a/k/a “Neo,” a/k/a “Geo Star,” QUIANA VELASCO, JOSE DANIEL ESTRELLA, PEDRO REYES, JAMIE VIVES CASTILLO, and ROBINSON CASTILLO** (hereinafter, “recruiters”) to further recruit and manage additional mules.

2. **TAHER** and his recruiters, including Defendants **GEANNIS GONZALEZ, ALFREDO TOVAR, a/k/a “Neo,” a/k/a “Geo Star,” QUIANA VELASCO, JOSE DANIEL ESTRELLA, PEDRO REYES, JAMIE VIVES CASTILLO, and ROBINSON CASTILLO,** and others, would recruit individuals to become money mules for **TAHER**’s organization under the auspices of offering them a “job” conducting wire transfers. **TAHER** and his recruiters would obtain a money mule’s personal information and use it to incorporate a shell company in that money mule’s name. Thereafter, **TAHER** and his recruiters would instruct the money mule to open shell bank accounts in the name of the shell company at various banks in the Southern District of Florida and elsewhere, and to falsely tell bank representatives that their shell company was a legitimate business engaged in the sale, import, or export of goods. **TAHER** and his recruiters gave different money mules a variety of explanations of the nature of their business, including the sale, export, or import of electronics, machinery, textiles, art, and other goods. However, the shell companies would not conduct any legitimate business.

3. Once a money mule had opened shell bank accounts in his or her shell company’s name, those accounts would receive wire transfers of the proceeds of various fraudulent schemes. The fraudulent schemes included, but were not limited to, the following:

a. **Email hacking or spoofing:** Co-conspirators would hack into a victim’s email account or otherwise taking over that account without permission. In a variation of this scheme, co-conspirators would “spoof” or create a fraudulent email account that was made to look like a victim’s real email account. The co-conspirators would then send email messages via the hacked or spoofed email accounts to banks, financial institutions, and corporations instructing them to wire large sums of money to the money mules’ shell bank accounts.

b. **Romance schemes:** Co-conspirators would contact victims through online dating, social networking, and other Internet sites under the auspices of starting a romantic relationship. After establishing an online relationship, the co-conspirators would induce the victims, through false claims of personal or business emergencies, to open bank accounts, deposit checks, and wire money to various shell bank accounts established by **TAHER**'s money mules.

c. **Inheritance and lottery schemes:** Co-conspirators would contact victims through various means and falsely tell them that they had either won a large lottery jackpot or stood to inherit a large sum of money. The co-conspirators would induce these victims to wire money to various shell bank accounts established by **TAHER**'s money mules by falsely telling the victims that they needed to pay taxes or fees in order to receive the jackpot or inheritance.

d. **Investment schemes:** Co-conspirators would contact victims through various means and fraudulently solicit investments in fictional business opportunities. The co-conspirators would thereby induce victims to wire money to various shell bank accounts established by **TAHER**'s money mules.

4. **TAHER** would notify money mules, and the recruiters who supervised them, when criminal proceeds would be arriving in a mule's shell bank account. Thereafter, **TAHER** would instruct the money mule and their recruiter about the movement of the fraudulently obtained funds. **TAHER** would send specific directions, using the email address ressiballs@gmail.com or other electronic means, to the money mule and/or the recruiter regarding amounts to be wired and the accounts to receive the funds, including accounts in the United States, Asia, Europe, or Africa. Once the money mule received these instructions, either directly from **TAHER** or from the

recruiter, the money mule would travel to bank branches in the Southern District of Florida, and elsewhere, to wire the funds to the accounts directed by **TAHER**.

5. Money mules would withdraw a percentage of the funds wired into their shell bank accounts as a commission, which sum they would then split with their recruiter, who would typically keep a larger share.

6. When banks froze or closed a money mule's shell bank account for suspected fraudulent activity, **TAHER** and the recruiter would instruct the money mule to use another shell bank account at another bank. In time, after all of a money mule's accounts had been frozen or closed, **TAHER** and the recruiter would ask the money mule to become a recruiter of new individuals willing to become money mules.

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

COUNT 2
Conspiracy to Commit Bank Fraud
(18 U.S.C. §§ 1344 and 1349)

The General Allegations section of this Indictment is re-alleged and fully incorporated herein by reference.

From in or about 2010, and continuing through the date of this Indictment, at Miami-Dade and Broward Counties, in the Southern District of Florida, and elsewhere, the defendants,

RODA TAHER,
a/k/a "Rida Taher,"
a/k/a "Reda Taher,"
a/k/a "Ressi,"
HANAN JAAFAR,
GEANNIS GONZALEZ,
ALFREDO TOVAR,
a/k/a "Neo,"
a/k/a "Geo Star,"
QUIANA VELASCO,
JOSE DANIEL ESTRELLA,
PEDRO REYES,

**JAMIE VIVES CASTILLO, and
ROBINSON CASTILLO,**

did willfully, that is, with the intent to further the object of the conspiracy, and knowingly combine conspire, confederate, and agree with each other, and with other persons known and unknown to the Grand Jury, to knowingly and with intent to defraud, execute and cause the execution of a scheme and artifice to defraud one or more financial institutions, as that term is defined in Title 18, United States Code, Section 20, including Bank of America, Wells Fargo Bank, SunTrust Bank, TD Bank, Citibank, PNC Bank, Bank Atlantic, Sovereign Bank, JPMorgan Chase Bank, and Wachovia Bank, which scheme and artifice would employ a material falsehood, and to knowingly execute and cause the execution of a scheme and artifice to obtain moneys and funds owned by, and under the custody and control of, one or more financial institutions, as identified herein, by means of false and fraudulent pretenses, representations, and promises relating to a material fact, in violation of Title 18, United States Code, Sections 1344(1) and (2).

OBJECT OF THE CONSPIRACY

It was the object of the conspiracy for the defendants and their co-conspirators to unlawfully enrich themselves and others and to further the fraud scheme by, among other things, defrauding and making false and fraudulent pretenses, representations, and promises to financial institutions regarding the legitimacy and purpose of shell company accounts, in order to receive, withdraw, and transmit fraudulently obtained funds.

MANNER AND MEANS OF THE CONSPIRACY

The Manner and Means section of Count 1 of this Indictment is re-alleged and fully incorporated herein by reference as the manner and means by which the defendants and their co-conspirators sought to accomplish the objects and purpose of the conspiracy.

All in violation of Title 18, United States Code, Section 1349.

COUNTS 3-5
Money Laundering
(18 U.S.C. § 1956(a)(1)(B)(i))

On or about the dates alleged below, in Miami-Dade and Broward Counties, in the Southern District of Florida, and elsewhere, the defendants,

RODA TAHER,
a/k/a “Rida Taher,”
a/k/a “Reda Taher,”
a/k/a “Ressi,” and
GEANNIS GONZALEZ,

did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign 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 the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, as more specifically described below:

COUNT	APPROXIMATE DATE	FINANCIAL TRANSACTION
3	June 23, 2015	Wire transfer of approximately \$38,500 from an account at SunTrust Bank in the name of Total Elegant Inc., account number ending in -4854, from a SunTrust Bank branch in Miami-Dade County, Florida, to an account in the name of Hungkei International Development, Ltd., at the Ping An Bank Co. in Shenzhen, China.
4	August 3, 2015	Wire transfer of approximately \$94,400 from an account at SunTrust Bank in the name of D'A....Trading, Inc., account number ending in -6848, from a SunTrust Bank branch in Miami-Dade County, Florida, to an account in the name of Huzhou Fuxing Weaving & Dyeing Co. at the Shanghai Pudong Development Bank in Zhejiang, China.
5	August 5, 2015	Wire transfer of approximately \$23,800 from an account at SunTrust Bank in the name of D'A....Trading, Inc., account number ending in -6848, from a SunTrust Bank branch in Miami-Dade County, Florida, to an account in the name of Zhejiang Yhuagroup Jilida Dye & Printing Co. at the bank of Huzhou Co., Ltd., in Zhejiang, China.

It is further alleged that the specified unlawful activity was wire fraud, in violation of Title 18, United States Code, Section 1343.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNTS 6-8
Transactions in Criminally Derived Property
(18 U.S.C. § 1957)

On or about the dates alleged below, in Miami-Dade and Broward Counties, in the Southern District of Florida, and elsewhere, the defendants,

RODA TAHER,
a/k/a “Rida Taher,”
a/k/a “Reda Taher,”
a/k/a “Ressi,” and
GEANNIS GONZALEZ,

did knowingly engage and attempt to engage in a monetary transaction by, through, or 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 specified unlawful activity, as more specifically described below:

COUNT	APPROXIMATE DATE	FINANCIAL TRANSACTION
6	June 23, 2015	Wire transfer of approximately \$38,500 from Total Elegant Inc.’s SunTrust Bank account number ending in -4854, in Miami-Dade County, Florida, to an account in the name of Hungkei International Development, Ltd., at the Ping An Bank Co. in Shenzhen, China.
7	August 3, 2015	Wire transfer of approximately \$94,400 from D’A....Trading, Inc.’s SunTrust Bank account number ending in -6848, in Miami-Dade County, Florida, to an account in the name of Huzhou Fuxing Weaving & Dyeing Co. at the Shanghai Pudong Development Bank in Zhejiang, China.
8	August 5, 2015	Wire transfer of approximately \$23,800 from D’A....Trading, Inc.’s SunTrust Bank account number ending in -6848, in Miami-Dade County, Florida, to an account in the name of Zhejiang Yhuagroup Jilida Dye & Printing Co. at the bank of Huzhou Co., Ltd., in Zhejiang, China.

It is further alleged that the specified unlawful activity was wire fraud, in violation of Title 18, United States Code, Section 1343.

All in violation of Title 18, United States Code, Sections 1957 and 2.

COUNT 9
Money Laundering
(18 U.S.C. § 1956(a)(1)(B)(i))

On or about March 13, 2014, at Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

RODA TAHER,
a/k/a “Rida Taher,”
a/k/a “Reda Taher,”
a/k/a “Ressi,” and
ALFREDO TOVAR,

did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign 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 the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, as more specifically described below:

The wire transfer of approximately \$11,000 from in the name of T...Global Sales, Inc.’s Wells Fargo Bank account number ending in -8393, in Miami-Dade County, Florida, to an account in the name of Superb Access, Ltd., at the Bank of Communications in Qingdao, China.

It is further alleged that the specified unlawful activity was wire fraud, in violation of Title 18, United States Code, Section 1343.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNT 10
Transactions in Criminally Derived Property
(18 U.S.C. § 1957)

On or about March 26, 2014, at Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

RODA TAHER,
a/k/a “Rida Taher,”
a/k/a “Reda Taher,”
a/k/a “Ressi,” and
ALFREDO TOVAR,

did knowingly engage and attempt to engage in a monetary transaction by, through, or 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 specified unlawful activity, as more specifically described below:

The obtaining of a cashier’s check for \$28,000 from the account of T....Global Sales, Inc., at Wells Fargo Bank, in Miami-Dade County, Florida, and causing it to be deposited into the account of Zion Luxury Car Rentals at Citibank in Miami-Dade County.

It is further alleged that the specified unlawful activity was wire fraud, in violation of Title 18, United States Code, Section 1343.

All in violation of Title 18, United States Code, Sections 1957 and 2.

COUNTS 11-13
Money Laundering
(18 U.S.C. § 1956(a)(1)(B)(i))

On or about the dates alleged below, in Miami-Dade and Broward Counties, in the Southern District of Florida, and elsewhere, the defendants,

RODA TAHER,
a/k/a “Rida Taher,”
a/k/a “Reda Taher,”
a/k/a “Ressi,” and
QUIANA VELASCO,

did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign 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 the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, as more specifically described below:

COUNT	APPROXIMATE DATE	FINANCIAL TRANSACTION
11	October 23, 2012	Wire transfer of approximately \$8,800 from an account at TD Bank in the name of WM Pure Products, Inc., account number ending in -6055, from a TD Bank branch in Broward County, Florida, to an account at Hong Kong and Shanghai Bank in the name of Geekar Development, Ltd., in Hong Kong.
12	June 5, 2013	Wire transfer of approximately \$7,900 from an account at TD Bank in the name of IG Top Trades, Inc., account number ending in -2394, from a TD Bank branch in Miami-Dade County, Florida, to a bank account in Geneva, Switzerland.
13	June 13, 2013	Wire transfer of approximately \$90,300 from an account at TD Bank in the name of IG Top Trades, Inc., account number ending in -2394, from a TD Bank branch in Miami-Dade County, Florida, to an account in the name of Hong Kong Grandness, Ltd., at Bank of Hong Kong, Ltd., in Hong Kong.

It is further alleged that the specified unlawful activity was wire fraud, in violation of Title 18, United States Code, Section 1343.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNT 14
Transactions in Criminally Derived Property
(18 U.S.C. § 1957)

On or about June 13, 2013, at Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

RODA TAHER,

**a/k/a “Rida Taher,”
a/k/a “Reda Taher,”
a/k/a “Ressi,” and
QUIANA VELASCO,**

did knowingly engage and attempt to engage in a monetary transaction by, through, or 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 specified unlawful activity, as more specifically described below:

The wire transfer of approximately \$90,300 from IG Top Trades, Inc.’s TD Bank account number ending in -2394, in Miami-Dade County, Florida, to an account in the name of Hong Kong Grandness, Ltd., at Bank of Hong Kong, Ltd., in Hong Kong.

It is further alleged that the specified unlawful activity was wire fraud, in violation of Title 18, United States Code, Section 1343.

All in violation of Title 18, United States Code, Sections 1957 and 2.

**COUNTS 15-18
Money Laundering
(18 U.S.C. § 1956(a)(1)(B)(i))**

On or about the dates alleged below, in Broward County, in the Southern District of Florida, and elsewhere, the defendants,

**RODA TAHER,
a/k/a “Rida Taher,”
a/k/a “Reda Taher,”
a/k/a “Ressi,” and
JOSE DANIEL ESTRELLA,**

did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign 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 the transaction was designed in whole or in part to

conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, as more specifically described below:

COUNT	APPROXIMATE DATE	FINANCIAL TRANSACTION
15	August 21, 2013	Wire transfer of approximately \$97,650 from an account at TD Bank in the name of R...World Wide Trades, Inc., account number ending in -7684, from a TD Bank branch in Broward County, Florida, to an account in the name of Apex Auto Parts Export GMBH at the Comez Bank Ag in Frankfurt, Germany.
16	August 22, 2013	Wire transfer of approximately \$95,000 from an account at TD Bank in the name of R...World Wide Trades, Inc., account number ending in -7684, from a TD Bank branch in Broward County, Florida, to an account in the name of Acacia Trading SA at UBS Ag Bank in Geneva, Switzerland.
17	October 18, 2013	Wire transfer of approximately \$26,300 from an account at TD Bank in the name of RD Solutions and Trades, Inc., account number ending in -2914, from a TD Bank branch in Broward County, Florida, to an account in the name of Sichuan Cotton and Ramie Group Corp. at China Everbright Bank in Chengdu, China.
18	October 23, 2013	Wire transfer of approximately \$15,000 from an account at JPMorgan Chase Bank in the name of R....Global Sales, Inc., account number ending in -3073, from a JPMorgan Chase Bank branch in Broward County, Florida, to an account in the name of CDF at Credit Agricole (Suisse) SA in Geneva, Switzerland.

It is further alleged that the specified unlawful activity was wire fraud, in violation of Title 18, United States Code, Section 1343.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNTS 19-21
Transactions in Criminally Derived Property
(18 U.S.C. § 1957)

On or about the dates alleged below, in Broward County, in the Southern District of Florida, and elsewhere, the defendants,

RODA TAHER,
a/k/a "Rida Taher,"

**a/k/a “Reda Taher,”
a/k/a “Ressi,” and
JOSE DANIEL ESTRELLA,**

did knowingly engage and attempt to engage in a monetary transaction by, through, or 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 specified unlawful activity, as more specifically described below:

COUNT	APPROXIMATE DATE	FINANCIAL TRANSACTION
19	August 21, 2013	Wire transfer of approximately \$97,650 from an account at TD Bank in the name of R...World Wide Trades, Inc., account number ending in -7684, from a TD Bank branch in Broward County, Florida, to an account in the name of Apex Auto Parts Export GMBH at the Comez Bank Ag in Frankfurt, Germany.
20	August 22, 2013	Wire transfer of approximately \$95,000 from an account at TD Bank in the name of R...World Wide Trades, Inc., account number ending in -7684, from a TD Bank branch in Broward County, Florida, to an account in the name of Acacia Trading SA at UBS Ag Bank in Geneva, Switzerland.
21	October 23, 2013	Wire transfer of approximately \$15,000 from an account at JPMorgan Chase Bank in the name of R....Global Sales, Inc., account number ending in -3073, from a JPMorgan Chase Bank branch in Broward County, Florida, to an account in the name of CDF at Credit Agricole (Suisse) SA in Geneva, Switzerland.

It is further alleged that the specified unlawful activity was wire fraud, in violation of Title 18, United States Code, Section 1343.

All in violation of Title 18, United States Code, Sections 1957 and 2.

**COUNTS 22-26
Money Laundering
(18 U.S.C. § 1956(a)(1)(B)(i))**

On or about the dates alleged below, in Miami-Dade and Broward Counties, in the Southern District of Florida, and elsewhere, the defendants,

**RODA TAHER,
a/k/a "Rida Taher,"
a/k/a "Reda Taher,"
a/k/a "Ressi," and
PEDRO REYES,**

did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign 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 the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, as more specifically described below:

COUNT	APPROXIMATE DATE	FINANCIAL TRANSACTION
22	July 5, 2013	Wire transfer of approximately \$28,300 from an account at SunTrust Bank in the name of A....Smart Investments, Inc., account number ending in -3944, from a SunTrust Bank branch in Broward County, Florida, to an account in the name of Navarto Grupo, S.A., at Bankia, S.A., in Valencia, Spain.
23	July 12, 2013	Wire transfer of approximately \$17,000 from an account at TD Bank in the name of A....Smart Investments, account number ending in -6978, from a TD Bank branch in Broward County, Florida, to an account in the name of Transpack, Ltd., at Bank of Baroda in Dubai, United Arab Emirates.
24	July 22, 2013	Wire transfer of approximately \$28,000 from an account at TD Bank in the name of JC Arts & Trades, Inc., account number ending in -2957, from a TD Bank branch in Broward County, Florida, to an account in the name of Superb Access, Ltd., at the Bank of Communications in Hangzhou, China.
25	September 13, 2013	Wire transfer of approximately \$98,800 from an account at Bank of America in the name of A....Smart Investments, account number ending in -4865, from a Bank of America branch in Broward County, Florida, to an account in the name of Punning Guang Hui Garment Co., Ltd., at the Bank of China in Guangdong, China.

COUNT	APPROXIMATE DATE	FINANCIAL TRANSACTION
26	September 13, 2013	Wire transfer of approximately \$61,400 from an account at SunTrust Bank in the name of C....Global Trades, Inc., account number ending in -6780, from a SunTrust Bank branch in Miami-Dade County, Florida, to an account in the name of Zhejiang Orient Group Light Industrial Products, Ltd., at the China CITIC Bank in Hangzhou, China.

It is further alleged that the specified unlawful activity was wire fraud, in violation of Title 18, United States Code, Section 1343.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNTS 27-31
Transactions in Criminally Derived Property
(18 U.S.C. § 1957)

On or about the dates alleged below, in Miami-Dade and Broward Counties, Florida, in the Southern District of Florida, and elsewhere, the defendants,

RODA TAHER,
a/k/a “Rida Taher,”
a/k/a “Reda Taher,”
a/k/a “Ressi,” and
PEDRO REYES,

did knowingly engage and attempt to engage in a monetary transaction by, through, or 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 specified unlawful activity, as more specifically described below:

COUNT	APPROXIMATE DATE	FINANCIAL TRANSACTION
27	July 5, 2013	Wire transfer of approximately \$28,300 from an account at SunTrust Bank in the name of A....Smart Investments, Inc., account number ending in -3944, from a SunTrust Bank branch in Broward County, Florida, to an account in the name of Navarto Grupo, S.A., at Bankia, S.A., in Valencia, Spain.
28	July 12, 2013	Wire transfer of approximately \$17,000 from an account at TD Bank in the name of A....Smart Investments, account number ending in -6978, from a TD Bank branch in Broward County, Florida, to an account in the name of Transpack, Ltd., at Bank of Baroda in Dubai, United Arab Emirates.
29	July 22, 2013	Wire transfer of approximately \$28,000 from an account at TD Bank in the name of JC Arts & Trades, Inc., account number ending in -2957, from a TD Bank branch in Broward County, Florida, to an account in the name of Superb Access, Ltd., at the Bank of Communications in Hangzhou, China.
30	September 13, 2013	Wire transfer of approximately \$98,800 from an account at Bank of America in the name of A....Smart Investments, account number ending in -4865, from a Bank of America branch in Broward County, Florida, to an account in the name of Punning Guang Hui Garment Co., Ltd., at the Bank of China in Guangdong, China.
31	September 13, 2013	Wire transfer of approximately \$61,400 from an account at SunTrust Bank in the name of C....Global Trades, Inc., account number ending in -6780, from a SunTrust Bank branch in Miami-Dade County, Florida, to an account in the name of Zhejiang Orient Group Light Industrial Products, Ltd., at the China CITIC Bank in Hangzhou, China.

It is further alleged that the specified unlawful activity was wire fraud, in violation of Title 18, United States Code, Section 1343.

All in violation of Title 18, United States Code, Sections 1957 and 2.

COUNTS 32-33
Money Laundering
(18 U.S.C. § 1956(a)(1)(B)(i))

On or about the dates alleged below, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

RODA TAHER,

**a/k/a "Rida Taher,"
a/k/a "Reda Taher,"
a/k/a "Ressi," and
JAMIE VIVES CASTILLO,**

did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign 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 the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, as more specifically described below:

COUNT	APPROXIMATE DATE	FINANCIAL TRANSACTION
32	March 27, 2013	Wire transfer of approximately \$131,000 from an account at TD Bank in the name of J.....Global Connections, Inc., account number ending in -5442, from a TD Bank branch in Miami-Dade County, Florida, to an account in the name of Tri Star Electronics at Standard Chartered Bank in Singapore.
33	June 4, 2013	Wire transfer of approximately \$23,550 from an account at Bank of America in the name of SJ.....International Trades, Inc., account number ending in -2880, from a Bank of America branch in Miami-Dade County, Florida, to an account at Credit Agricole (Suisse) SA in Geneva, Switzerland.

It is further alleged that the specified unlawful activity was wire fraud, in violation of Title 18, United States, Section 1343.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

**COUNTS 34-35
Transactions in Criminally Derived Property
(18 U.S.C. § 1957)**

On or about the dates alleged below, in Miami-Dade County, Florida, in the Southern District of Florida, and elsewhere, the defendants,

**RODA TAHER,
a/k/a "Rida Taher,"
a/k/a "Reda Taher,"
a/k/a "Ressi," and
JAMIE VIVES CASTILLO,**

did knowingly engage and attempt to engage in a monetary transaction by, through, or 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 specified unlawful activity, as more specifically described below:

COUNT	APPROXIMATE DATE	FINANCIAL TRANSACTION
34	March 27, 2013	Wire transfer of approximately \$131,000 from an account at TD Bank in the name of J.....Global Connections, Inc., account number ending in -5442, from a TD Bank branch in Miami-Dade County, Florida, to an account in the name of Tri Star Electronics at Standard Chartered Bank in Singapore.
35	June 4, 2013	Wire transfer of approximately \$23,550 from an account at Bank of America in the name of SJ.....International Trades, Inc., account number ending in -2880, from a Bank of America branch in Miami-Dade County, Florida, to an account at Credit Agricole (Suisse) SA in Geneva, Switzerland.

It is further alleged that the specified unlawful activity was wire fraud, in violation of Title 18, United States Code, Section 1343.

All in violation of Title 18, United States Code, Sections 1957 and 2.

**COUNTS 36-38
Money Laundering
(18 U.S.C. § 1956(a)(1)(B)(i))**

On or about the dates alleged below, in Miami-Dade and Broward Counties, in the Southern District of Florida, and elsewhere, the defendants,

**RODA TAHER,
a/k/a "Rida Taher,"**

**a/k/a “Reda Taher,”
a/k/a “Ressi,” and
ROBINSON CASTILLO,**

did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign 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 the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, as more specifically described below:

COUNT	APPROXIMATE DATE	FINANCIAL TRANSACTION
36	August 20, 2013	Wire transfer of approximately \$46,980 from an account at TD Bank in the name of P....International Trades, Inc., account number ending in -5029, from a TD Bank branch in Miami-Dade County, Florida, to an account in the name of Strong Technologies at a bank in Dubai, United Arab Emirates.
37	January 2, 2014	Wire transfer of approximately \$37,500 from an account at Wells Fargo Bank in the name of F.....G.....Enterprises, Inc., account number ending in -4246, from a Wells Fargo Bank branch in Miami-Dade County, Florida, to an account at the Afrasian Bank in Mauritius.
38	January 23, 2014	Wire transfer of approximately \$13,400 from an account at Bank United in the name of F.....G.....Enterprises, Inc., account number ending in -5544, from a Bank United branch in Miami-Dade County, Florida, to an account at the Bank of China in Zhejiang, Republic of China.

It is further alleged that the specified unlawful activity was wire fraud, in violation of Title 18, United States Code, Section 1343.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNT 39-41
Transactions in Criminally Derived Property
(18 U.S.C. § 1957)

On or about the dates alleged below, in Miami-Dade and Broward Counties, in the Southern District of Florida, and elsewhere, the defendants,

RODA TAHER,
a/k/a “Rida Taher,”
a/k/a “Reda Taher,”
a/k/a “Ressi,” and
ROBINSON CASTILLO,

did knowingly engage and attempt to engage in a monetary transaction by, through, or 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 specified unlawful activity, as more specifically described below:

COUNT	APPROXIMATE DATE	FINANCIAL TRANSACTION
39	August 20, 2013	Wire transfer of approximately \$46,980 from an account at TD Bank in the name of P....International Trades, Inc., account number ending in -5029, from a TD Bank branch in Miami-Dade County, Florida, to an account in the name of Strong Technologies at a bank in Dubai, United Arab Emirates.
40	January 2, 2014	Wire transfer of approximately \$37,500 from an account at Wells Fargo Bank in the name of F.....G.....Enterprises, Inc., account number ending in -4246, from a Wells Fargo Bank branch in Miami-Dade County, Florida, to an account at the Afrasian Bank in Mauritius.
41	January 23, 2014	Wire transfer of approximately \$13,400 from an account at Bank United in the name of F.....G.....Enterprises, Inc., account number ending in -5544, from a Bank United branch in Miami-Dade County, Florida, to an account at the Bank of China in Zhejiang, Republic of China.

It is further alleged that the specified unlawful activity was wire fraud, in violation of Title 18, United States Code, Section 1343.

All in violation of Title 18, United States Code, Sections 1957 and 2.

FORFEITURE ALLEGATIONS
(18 U.S.C. §§ 981 and 982)

1. The allegations contained in this Indictment 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 Defendants **RODA TAHER, a/k/a “Rida Taher,” a/k/a “Reda Taher,” a/k/a “Ressi,” HANAN JAAFAR, GEANNIS GONZALEZ, ALFREDO TOVAR, a/k/a “Neo,” a/k/a “Geo Star,” QUIANA VELASCO, JOSE DANIEL ESTRELLA, PEDRO REYES, JAMIE VIVES CASTILLO, and ROBINSON CASTILLO**, have an interest including, but not limited to, the following:

Approximately Ninety-Four Million Dollars (\$94,000,000.00) in U.S. currency, in that such sum in aggregate are proceeds from violations of money laundering, mail, wire, and bank fraud, transactions in criminally derived property, and stealing bank funds or are traceable thereto.

2. Upon conviction of a violation of Title 18, United States Code, Sections 1956 and 1957, as alleged in this Indictment, the defendants shall forfeit to the United States any property, real or personal, involved in such offense, or any property traceable to such property, pursuant to Title 18, United States Code, Section 982(a)(1).

3. Upon conviction of a violation of Title 18, United States Code, Section 1349, as alleged in this Indictment, the defendants shall forfeit to the United States any property constituting or derived from proceeds obtained as a result of the violation, pursuant to Title 18, United States Code, Section 982(a)(2).

4. If any of the forfeitable property described in the forfeiture section of this Indictment, 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 person;
- (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 subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(a)(1), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

All pursuant to Title 18, United States Code, Sections 982(a)(1) and 981(a)(1)(C), as made applicable by Title 28, United States Code, Section 2461(c), and the procedures set forth in Title 21, United States Code, Section 853.

A TRUE BILL / / / /


BENJAMIN G. GREENBERG
ACTING UNITED STATES ATTORNEY


for: MICHAEL WALLEISA
ASSISTANT UNITED STATES ATTORNEY


JARED M. STRAUSS
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO. _____

vs.

CERTIFICATE OF TRIAL ATTORNEY*

RODA TAHER, et al.,

Defendants. /

Superseding Case Information:

Court Division: (Select One)

Miami _____ Key West _____
FTL X WPB _____ FTP _____

New Defendant(s) _____ Yes _____ No
Number of New Defendants _____
Total number of counts _____

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. Section 3161.

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

4. This case will take 40 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	_____	Misdem.	_____
		<u>X</u>		_____
IV	21 to 60 days	_____	Felony	<u>X</u>
V	61 days and over	_____		

6. Has this case been previously filed in this District Court? No (Yes or No)

If yes:

Judge: _____ Case No. _____

(Attach copy of dispositive order)

Has a complaint been filed in this matter? No

If yes:

Magistrate Case No. _____

Related Miscellaneous numbers: _____

Defendant(s) in federal custody as of _____

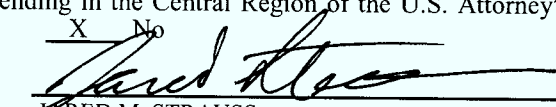
Defendant(s) in state custody as of _____

Rule 20 from the District of _____

Is this a potential death penalty case? X No (Yes or No)

7. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to October 14, 2003? _____ Yes X No

8. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to September 1, 2007? Yes _____ X No


JARED M. STRAUSS
ASSISTANT U.S. ATTORNEY
Court Id No. A5501264

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: RODA TAHER, a/k/a "Rida Taher," a/k/a "Reda Taher," a/k/a "Ressi"

Case No: _____

Count: 1

Conspiracy to Commit Money Laundering

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

***Max. Penalty:** 20 Years' Imprisonment

Count: 2

Conspiracy to Commit Bank Fraud

Title 18, United States Code, Sections 1344 and 1349

***Max. Penalty:** 30 Years' Imprisonment

Counts: 3-5, 9, 11-13, 15-18, 22-26, 32-33, and 36-38

Money Laundering

Title 18, United States Code, Section 1956(a)(1)(B)(i)

***Max. Penalty:** 20 Years' Imprisonment

Counts: 6-8, 10, 14, 19-21, 27-31, 34-35, and 39-41

Transactions in Criminally Derived Property

Title 18, United States Code, Section 1957

***Max. Penalty:** 10 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.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

PENALTY SHEET

Defendant's Name: HANAN JAAFAR

Case No: _____

Count: 1

Conspiracy to Commit Money Laundering

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

***Max. Penalty:** 20 Years' Imprisonment

Count: 2

Conspiracy to Commit Bank Fraud

Title 18, United States Code, Sections 1344 and 1349

***Max. Penalty:** 30 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.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: GEANNIS GONZALEZ

Case No: _____

Count: 1

Conspiracy to Commit Money Laundering

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

***Max. Penalty:** 20 Years' Imprisonment

Count: 2

Conspiracy to Commit Bank Fraud

Title 18, United States Code, Sections 1344 and 1349

***Max. Penalty:** 30 Years' Imprisonment

Counts: 3-5

Money Laundering

Title 18, United States Code, Section 1956(a)(1)(B)(i)

***Max. Penalty:** 20 Years' Imprisonment

Counts: 6-8

Transactions in Criminally Derived Property

Title 18, United States Code, Section 1957

***Max. Penalty:** 10 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.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: ALFREDO TOVAR, a/k/a "Neo," a/k/a "Geo Star,"

Case No: _____

Count: 1

Conspiracy to Commit Money Laundering

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

***Max. Penalty:** 20 Years' Imprisonment

Count: 2

Conspiracy to Commit Bank Fraud

Title 18, United States Code, Sections 1344 and 1349

***Max. Penalty:** 30 Years' Imprisonment

Count: 9

Money Laundering

Title 18, United States Code, Section 1956(a)(1)(B)(i)

***Max. Penalty:** 20 Years' Imprisonment

Count: 10

Transactions in Criminally Derived Property

Title 18, United States Code, Section 1957

***Max. Penalty:** 10 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.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: QUIANA VELASCO

Case No:

Count: 1

Conspiracy to Commit Money Laundering

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

***Max. Penalty:** 20 Years' Imprisonment

Count: 2

Conspiracy to Commit Bank Fraud

Title 18, United States Code, Sections 1344 and 1349

***Max. Penalty:** 30 Years' Imprisonment

Counts: 11-13

Money Laundering

Title 18, United States Code, Section 1956(a)(1)(B)(i)

***Max. Penalty:** 20 Years' Imprisonment

Count: 14

Transactions in Criminally Derived Property

Title 18, United States Code, Section 1957

***Max. Penalty:** 10 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.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: JOSE DANIEL ESTRELLA

Case No: _____

Count: 1

Conspiracy to Commit Money Laundering

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

***Max. Penalty:** 20 Years' Imprisonment

Count: 2

Conspiracy to Commit Bank Fraud

Title 18, United States Code, Sections 1344 and 1349

***Max. Penalty:** 30 Years' Imprisonment

Counts: 15-18

Money Laundering

Title 18, United States Code, Section 1956(a)(1)(B)(i)

***Max. Penalty:** 20 Years' Imprisonment

Counts: 19-21

Transactions in Criminally Derived Property

Title 18, United States Code, Section 1957

***Max. Penalty:** 10 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.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: PEDRO REYES

Case No: _____

Count: 1

Conspiracy to Commit Money Laundering

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

***Max. Penalty:** 20 Years' Imprisonment

Count: 2

Conspiracy to Commit Bank Fraud

Title 18, United States Code, Sections 1344 and 1349

***Max. Penalty:** 30 Years' Imprisonment

Counts: 22-26

Money Laundering

Title 18, United States Code, Section 1956(a)(1)(B)(i)

***Max. Penalty:** 20 Years' Imprisonment

Counts: 27-31

Transactions in Criminally Derived Property

Title 18, United States Code, Section 1957

***Max. Penalty:** 10 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.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: JAMIE VIVES CASTILLO

Case No: _____

Count: 1

Conspiracy to Commit Money Laundering

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

***Max. Penalty:** 20 Years' Imprisonment

Count: 2

Conspiracy to Commit Bank Fraud

Title 18, United States Code, Sections 1344 and 1349

***Max. Penalty:** 30 Years' Imprisonment

Counts: 32-33

Money Laundering

Title 18, United States Code, Section 1956(a)(1)(B)(i)

***Max. Penalty:** 20 Years' Imprisonment

Counts: 34-35

Transactions in Criminally Derived Property

Title 18, United States Code, Section 1957

***Max. Penalty:** 10 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.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: ROBINSON CASTILLO

Case No: _____

Count: 1

Conspiracy to Commit Money Laundering

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

***Max. Penalty:** 20 Years' Imprisonment

Count: 2

Conspiracy to Commit Bank Fraud

Title 18, United States Code, Sections 1344 and 1349

***Max. Penalty:** 30 Years' Imprisonment

Counts: 36-38

Money Laundering

Title 18, United States Code, Section 1956(a)(1)(B)(i)

***Max. Penalty:** 20 Years' Imprisonment

Counts: 39-41

Transactions in Criminally Derived Property

Title 18, United States Code, Section 1957

***Max. Penalty:** 10 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.