

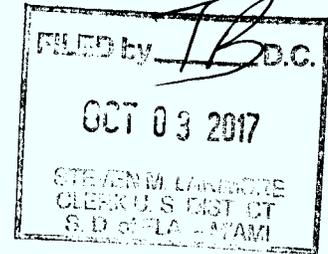
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: **17-20702**

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

OR-MARTINEZ

OTAZO-REYES



UNITED STATES OF AMERICA

vs.

LUIS ANGEL DE JESUS ALFONSECA PUJOLS,

a/k/a "Luis Alfonseca Pujols,"

a/k/a "Luis A. Alfonseca,"

a/k/a "Luis Alfonseca,"

a/k/a "Luigi,"

GARY ALBERTO CAMILO,

a/k/a "Gary Alberto Camilo Florencio,"

JEAN-PHILIPPE ETIENNE,

a/k/a "Jean-Phillipe Hughes Etienne,"

a/k/a "Jean Etienne,"

KARINA MARIE OCASIO,

a/k/a "Karina Matos,"

RANDY ELIESSEL SANTOS,

a/k/a "Randy E. Santos," and

COSME DANIEL ENRIQUE VASQUEZ,

a/k/a "Cosme D. Vazquez,"

a/k/a "Cosme Vasquez,"

Defendants.

_____ /

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At various times material to this Indictment:

Definitions

1. The term “shell company” refers 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 bank fraud, wire fraud, money laundering, or other criminal offenses.
2. The term “shell company account” refers to a bank account in the name of a shell company.

Shell Companies

3. Camilo International Trading Inc. (“Camilo International Trading”) was a Florida corporation with its principal place of business listed as 16508 Sapphire Street, Weston, Florida 33331.
4. Cosme Global Trades Inc. (“Cosme Global Trades”) was a Florida corporation with its principal place of business listed as 18856 N.W. 85th Avenue, Miami, Florida 33015.
5. Jean Champions Trade Inc. (“Jean Champions Trade”) was a Florida corporation with its principal place of business listed as 1281 S.W. 109th Avenue, Pembroke Pines, Florida 33025.
6. Luis Global Investments Inc. (“Luis Global Investments”) was a Florida corporation with its principal place of business listed as 8642 N.W. 198th Street, Hialeah, Florida 33015.
7. Ocasio Trades Inc. (“Ocasio Trades”) was a Florida corporation with its principal place of business listed as 22529 Swordfish Drive, Boca Raton, Florida 33428.
8. Santos Global Sales Inc. (“Santos Global Sales”) was a Florida corporation with its

principal place of business listed as 1118 N. 15th Avenue, Suite 2, Hollywood, Florida 33020.

9. Barcelo Max Trades Inc. (“Barcelo Max Trades”) was a Florida corporation with its principal place of business listed as 16040 South Post Road, Apartment 103, Weston, Florida 33331.

10. DB Wholesale Prices Inc. (“DB Wholesale Prices”) was a Florida corporation with its principal place of business listed as 2004 N.W. 179th Avenue, Pembroke Pines, Florida 33029.

11. JF Smart Connections Inc. (“JF Smart Connections”) was a Florida corporation with its principal place of business listed as 304 Indian Trace, Apartment 335, Weston, Florida 33326.

12. JG Planet Trades Inc. (“JG Planet Trades”) was a Florida corporation with its principal place of business listed as 932 S.W. 132nd Terrace, Davie, Florida 33325.

13. JR True Connections Inc. (“JR True Connections”) was a Florida corporation with its principal place of business listed as 6135 N.W. 186th Street, Apartment 105, Miami, Florida 33015.

14. JR Vast Enterprises Inc. (“JR Vast Enterprises”) was a Florida corporation with its principal place of business listed as 6135 N.W. 186th Street, Apartment 105, Miami, Florida 33015.

15. United Wire Metal and Machine Inc. (“United Wire Metal”) was a Florida corporation with its principal place of business listed as 691 Lakeview Drive, Coral Springs, Florida 33071.

16. Camilo International Trading, Cosme Global Trades, Jean Champions Trade, Luis Global Investments, Ocasio Trades, Santos Global Sales, Barcelo Max Trades, DB Wholesale Prices, JF Smart Connections, JG Planet Trades, JR True Connections, JR Vast Enterprises, and

United Wire Metal were shell companies.

Financial Institutions

17. Bank of America, N.A. (“Bank of America”), Citibank, N.A. (“Citibank”), JPMorgan Chase Bank, N.A. (“Chase Bank”), PNC Bank, N.A. (“PNC Bank”), SunTrust Bank (“SunTrust Bank”), TD Bank, N.A. (“TD Bank”), 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

18. Defendant **LUIS ANGEL DE JESUS ALFONSECA PUJOLS, a/k/a “Luis Alfonseca Pujols,” a/k/a “Luis A. Alfonseca,” a/k/a “Luis Alfonseca,” a/k/a “Luigi”** (herein referred to as “**ALFONSECA**”), was an individual who resided in Miami-Dade and Broward Counties. **ALFONSECA** was the incorporator, director, and president of Luis Global Investments.

19. Defendant **GARY ALBERTO CAMILO, a/k/a “Gary Alberto Camilo Florencio”** (herein referred to as “**CAMILO**”), was an individual who resided in Broward County. **CAMILO** was the incorporator, director, and president of Camilo International Trading.

20. Defendant **JEAN-PHILIPPE ETIENNE, a/k/a “Jean-Philippe Hughes Etienne,” a/k/a “Jean Etienne”** (herein referred to as “**ETIENNE**”), was an individual who resided in Broward County. **ETIENNE** was the incorporator, director, and president of Jean Champions Trade.

21. Defendant **KARINA MARIE OCASIO, a/k/a “Karina Matos”** (herein referred to as “**OCASIO**”), was an individual who resided in Palm Beach County. **OCASIO** was the

incorporator, director, and president of Ocasio Trades.

22. Defendant **RANDY ELIESSEL SANTOS**, a/k/a “**Randy E. Santos**” (herein referred to as “**SANTOS**”), was an individual who resided in Broward County. **SANTOS** was the incorporator, director, and president of Santos Global Sales Inc.

23. Defendant **COSME DANIEL ENRIQUE VASQUEZ**, a/k/a “**Cosme D. Vazquez**,” a/k/a “**Cosme Vasquez**” (herein referred to as “**VASQUEZ**”), was an individual who resided in Miami-Dade County. **VASQUEZ** was the incorporator, director, and president of Cosme Global Trades.

COUNT 1
CONSPIRACY TO COMMIT MONEY LAUNDERING
(18 U.S.C. § 1956(h))

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

2. From in or around March, 2013, and continuing through in or around September, 2014, in Miami-Dade, Broward, and Palm Beach Counties, in the Southern District of Florida, and elsewhere, the defendants,

LUIS ANGEL DE JESUS ALFONSECA PUJOLS,
a/k/a “**Luis Alfonseca Pujols,**”
a/k/a “**Luis A. Alfonseca,**”
a/k/a “**Luis Alfonseca,**”
a/k/a “**Luigi,**”
GARY ALBERTO CAMILO,
a/k/a “**Gary Alberto Camilo Florencio,**”
JEAN-PHILIPPE ETIENNE,
a/k/a “**Jean-Phillipe Hughes Etienne,**”
a/k/a “**Jean Etienne,**”
KARINA MARIE OCASIO,
a/k/a “**Karina Matos,**”
RANDY ELIESSEL SANTOS,
a/k/a “**Randy E. Santos,**” and
COSME DANIEL ENRIQUE VASQUEZ,
a/k/a “**Cosme D. Vazquez,**”

a/k/a “Cosme Vasquez,”

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 certain offenses against the United States, in violation of Title 18, United States Code, Section 1956, that is, to:

(a) knowingly 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 such financial 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)(1)(B)(i); and

(b) transport, transmit, and transfer, and attempt to transport, transmit, and transfer a monetary instrument and funds from a place in the United States to and through a place outside the United States, knowing that the monetary instrument and funds involved in the transportation, transmission, and transfer, represented the proceeds of some form of unlawful activity, and knowing that such transportation, transmission, and transfer 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)(2)(B)(i).

It is further alleged that the specified unlawful activity is wire fraud, in violation of Title 18, United States Code, Section 1343, and bank fraud, in violation of Title 18, United States Code, Section 1344(1) and (2).

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

COUNTS 2-25
INTERNATIONAL MONEY LAUNDERING
(18 U.S.C. § 1956(a)(2)(B)(i))

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

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

LUIS ANGEL DE JESUS ALFONSECA PUJOLS,
a/k/a “Luis Alfonseca Pujols,”
a/k/a “Luis A. Alfonseca,”
a/k/a “Luis Alfonseca,”
a/k/a “Luigi,”
GARY ALBERTO CAMILO,
a/k/a “Gary Alberto Camilo Florencio,”
JEAN-PHILIPPE ETIENNE,
a/k/a “Jean-Phillipe Hughes Etienne,”
a/k/a “Jean Etienne,”
RANDY ELIESSEL SANTOS,
a/k/a “Randy E. Santos,” and
COSME DANIEL ENRIQUE VASQUEZ,
a/k/a “Cosme D. Vazquez,”
a/k/a “Cosme Vasquez,”

did knowingly transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds from a place in the United States to and through a place outside the United States, as more particularly described below, knowing that the monetary instruments and funds involved in the transportation, transmission, and transfer, and attempted transportation, transmission, and transfer, represented the proceeds of some form of unlawful activity, and knowing that such transportation, transmission, and transfer, and attempted transportation, transmission, and transfer was designed in whole or in part to conceal the nature, the source, the ownership, and the control of the proceeds of specified unlawful activity:

Cosme Global Trades Accounts

COUNT	APPROX. DATE	DEFENDANT	FINANCIAL TRANSACTION
2	4/17/2013	COSME DANIEL ENRIQUE VASQUEZ	Wire-transfer of approximately \$79,100 from TD Bank account ending in 6745, in Miami Lakes, Florida, to Banco Bilbao Vizcaya Argentaria S.A. account ending in 8699, in Spain
3	4/22/2013	COSME DANIEL ENRIQUE VASQUEZ	Wire-transfer of approximately \$27,000 from SunTrust Bank account ending in 5832, in Miami Lakes, Florida, to Oversea-Chinese Banking Corporation Limited (OCBC Bank) account ending in 1301, in Singapore
4	5/8/2013	COSME DANIEL ENRIQUE VASQUEZ	Wire-transfer of approximately \$56,800 from TD Bank account ending in 6745, in Miami Lakes, Florida, to Standard Chartered Bank account ending in 9301, in Singapore

Camilo International Trading Accounts

COUNT	APPROX. DATE	DEFENDANT	FINANCIAL TRANSACTION
5	9/4/2013	GARY ALBERTO CAMILO	Book transfer debit of approximately \$11,900 from Chase Bank account ending in 8595, in Hialeah, Florida, to China Citic Bank account ending in 8579, in the People's Republic of China
6	9/4/2013	GARY ALBERTO CAMILO	Book transfer debit of approximately \$7,500 from Chase Bank account ending in 8595, in Hialeah, Florida, to China Everbright Bank account ending in 9869, in the People's Republic of China

COUNT	APPROX. DATE	DEFENDANT	FINANCIAL TRANSACTION
7	11/14/2013	GARY ALBERTO CAMILO	Wire-transfer of approximately \$11,900 from PNC Bank account ending in 1675, in Miramar, Florida, to China Everbright Bank account ending in 9869, in the People's Republic of China
8	11/15/2013	GARY ALBERTO CAMILO	Wire-transfer of approximately \$35,000 from PNC Bank account ending in 1675, in Miramar, Florida, to China Citic Bank account ending in 8579, in the People's Republic of China

Luis Global Investments Accounts

COUNT	APPROX. DATE	DEFENDANT	FINANCIAL TRANSACTION
9	12/11/2013	LUIS ANGEL DE JESUS ALFONSECA PUJOLS	Wire transfer of approximately \$78,600 from Wells Fargo Bank account ending in 0240, in Weston, Florida, to Bank of China account ending in 1014, in the People's Republic of China
10	12/12/2013	LUIS ANGEL DE JESUS ALFONSECA PUJOLS	Wire transfer of approximately \$16,300 from Wells Fargo Bank account ending in 0240, in Weston, Florida, to Bank of Communications Co. Ltd. account ending in 9312, in the People's Republic of China
11	12/17/2013	LUIS ANGEL DE JESUS ALFONSECA PUJOLS	Wire transfer of approximately \$99,850 from TD Bank account ending in 0964, in Pembroke Pines, Florida, to HSBC Bank account ending in 9838, in the People's Republic of China

COUNT	APPROX. DATE	DEFENDANT	FINANCIAL TRANSACTION
12	12/17/2013	LUIS ANGEL DE JESUS ALFONSECA PUJOLS	Wire transfer of approximately \$50,000 from TD Bank account ending in 0964, in Pembroke Pines, Florida, to Shanghai Pudong Development Bank account ending in 4556, in the People's Republic of China
13	12/20/2013	LUIS ANGEL DE JESUS ALFONSECA PUJOLS	Wire transfer of approximately \$33,000 from Wells Fargo Bank account ending in 0240, in Weston, Florida, to Bank of China account, in the People's Republic of China
14	12/26/2013	LUIS ANGEL DE JESUS ALFONSECA PUJOLS	Wire transfer of approximately \$38,500 from SunTrust Bank account ending in 9277, in Davie, Florida, to Bank of China account ending in 1014, in the People's Republic of China
15	12/27/2013	LUIS ANGEL DE JESUS ALFONSECA PUJOLS	Attempted wire-transfer of funds from Wells Fargo Bank account ending in 0240, in Weston, Florida, to the People's Republic of China
16	2/18/2014	LUIS ANGEL DE JESUS ALFONSECA PUJOLS	Wire-transfer of approximately \$36,000, from PNC Bank account ending in 2601, in Weston, Florida, to Banco Bilbao Vizcaya Argentaria S.A. account ending in 8699, in Spain

Santos Global Sales Accounts

COUNT	APPROX. DATE	DEFENDANT	FINANCIAL TRANSACTION
17	2/4/2014	RANDY ELIESSEL SANTOS	Wire-transfer of approximately \$48,000 from PNC Bank account ending in 9905, in Hollywood, Florida, to Bank of Communications Co. Ltd. account ending in 9312 in the People's Republic of China

COUNT	APPROX. DATE	DEFENDANT	FINANCIAL TRANSACTION
18	2/14/2014	RANDY ELIESEL SANTOS	Book transfer debit of approximately \$28,000 from Chase Bank account ending in 5009, in Hollywood, Florida, to Banco Bilbao Vizcaya Argentaria S.A. account, in Spain
19	2/19/2014	RANDY ELIESEL SANTOS	Book transfer debit of approximately \$50,000 from Chase Bank account ending in 5009, in Hollywood, Florida, to China Construction Bank account ending in 6122, in the People's Republic of China
20	2/19/2014	RANDY ELIESEL SANTOS	Book transfer debit of approximately \$60,000 from Chase Bank account ending in 5009, in Hollywood, Florida, to Shanghai Pudong Development Bank account ending in 8749, in the People's Republic of China
21	2/20/2014	RANDY ELIESEL SANTOS	Book transfer debit of approximately \$41,000 from Chase Bank account ending in 5009, in Hollywood, Florida, to Shanghai Pudong Development Bank account ending in 8749, in the People's Republic of China
22	2/25/2014	RANDY ELIESEL SANTOS	Book transfer debit of approximately \$75,000 from Chase Bank account ending in 5009, in Hollywood, Florida, to Banco Bilbao Vizcaya Argentaria S.A. account ending in 8699, in Spain
23	2/25/2014	RANDY ELIESEL SANTOS	Book transfer debit of approximately \$99,650 from Chase Bank account ending in 5009, in Hollywood, Florida, to Bank of Communications Co. Ltd. account ending in 9312, in the People's Republic of China

COUNT	APPROX. DATE	DEFENDANT	FINANCIAL TRANSACTION
24	2/26/2014	RANDY ELIESSEL SANTOS	Book transfer debit of approximately \$33,480 from Chase Bank account ending in 5009, in Hollywood, Florida, to Bank of Communications Co. Ltd. account ending in 9312, in the People's Republic of China

Jean Champions Trade Accounts

COUNT	APPROX. DATE	DEFENDANT	FINANCIAL TRANSACTION
25	7/7/2014	JEAN-PHILIPPE ETIENNE	Wire-transfer of approximately \$35,800 from TD Bank account ending in 8519, in Pembroke Pines, Florida, to Shanghai Pudong Development Bank account ending in 8749, in the People's Republic of China

It is further alleged that the specified unlawful activity is wire fraud, in violation of Title 18, United States Code, Section 1343, and bank fraud, in violation of Title 18, United States Code, Section 1344(1) and (2).

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

COUNTS 26-48
MONEY LAUNDERING
(18 U.S.C. § 1956(a)(1)(B)(i))

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

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

LUIS ANGEL DE JESUS ALFONSECA PUJOLS,
a/k/a "Luis Alfonseca Pujols,"
a/k/a "Luis A. Alfonseca,"
a/k/a "Luis Alfonseca,"
a/k/a "Luigi,"

GARY ALBERTO CAMILO,
a/k/a “Gary Alberto Camilo Florencio,”
JEAN-PHILIPPE ETIENNE,
a/k/a “Jean-Phillipe Hughes Etienne,”
a/k/a “Jean Etienne,”
KARINA MARIE OCASIO,
a/k/a “Karina Matos,”
RANDY ELIESSEL SANTOS,
a/k/a “Randy E. Santos,” and
COSME DANIEL ENRIQUE VASQUEZ,
a/k/a “Cosme D. Vazquez,”
a/k/a “Cosme Vasquez,”

did knowingly conduct and attempt to conduct financial transactions, affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, as more particularly described below:

Cosme Global Trades Accounts

COUNT	APPROX. DATE	DEFENDANT	FINANCIAL TRANSACTION
26	4/17/2013	COSME DANIEL ENRIQUE VASQUEZ	Withdrawal of approximately \$5,240 from TD Bank account ending in 6745, in Miami Lakes, Florida
27	4/22/2013	COSME DANIEL ENRIQUE VASQUEZ	Withdrawal of approximately \$1,420 from SunTrust Bank account ending in 5832, in Miami Lakes, Florida
28	5/8/2013	COSME DANIEL ENRIQUE VASQUEZ	Withdrawal of approximately \$3,000 from TD Bank account ending in 6745, in Miami Lakes, Florida

Camilo International Trading Accounts

COUNT	APPROX. DATE	DEFENDANT	FINANCIAL TRANSACTION
29	9/5/2013	GARY ALBERTO CAMILO	Withdrawal of approximately \$3,250 from Chase Bank account ending in 8595, in Hialeah, Florida

Luis Global Investments Accounts

COUNT	APPROX. DATE	DEFENDANT	FINANCIAL TRANSACTION
30	12/11/2013	LUIS ANGEL DE JESUS ALFONSECA PUJOLS	Withdrawal of approximately \$4,000 from Wells Fargo Bank account ending in 0240, in Weston, Florida
31	12/17/2013	LUIS ANGEL DE JESUS ALFONSECA PUJOLS	Withdrawal of approximately \$7,190 from TD Bank account ending in 0964, in Pembroke Pines, Florida
32	12/20/2013	LUIS ANGEL DE JESUS ALFONSECA PUJOLS	Withdrawal of approximately \$1,750 from Wells Fargo Bank account ending in 0240, in Weston, Florida
33	12/26/2013	LUIS ANGEL DE JESUS ALFONSECA PUJOLS	Withdrawal of approximately \$2,050 from SunTrust Bank account ending in 9277, in Davie, Florida
34	12/30/2013	LUIS ANGEL DE JESUS ALFONSECA PUJOLS	Withdrawal of approximately \$4,950 from SunTrust Bank account ending in 9277, in Davie, Florida
35	2/12/2014	LUIS ANGEL DE JESUS ALFONSECA PUJOLS	Withdrawal of approximately \$37,500 from Chase Bank account ending in 7255, in Miami, Florida, and purchase of Chase Bank Cashier's Check No. 1175012199, in the amount of \$37,500
36	2/12/2014	LUIS ANGEL DE JESUS ALFONSECA PUJOLS	Deposit of Chase Bank Cashier's Check No. 1175012199, in the amount of \$37,500, in PNC Bank account ending in 2601, at PNC Bank, in Weston, Florida

COUNT	APPROX. DATE	DEFENDANT	FINANCIAL TRANSACTION
37	3/4/2014	LUIS ANGEL DE JESUS ALFONSECA PUJOLS	Withdrawal of approximately \$2,700 from PNC Bank account ending in 2601, in Weston, Florida

Ocasio Trades Accounts

COUNT	APPROX. DATE	DEFENDANT	FINANCIAL TRANSACTION
38	1/29/2014	KARINA MARIE OCASIO	Withdrawal of approximately \$8,000 from PNC Bank account ending in 4126, in Coconut Creek, Florida

Santos Global Sales Accounts

COUNT	APPROX. DATE	DEFENDANT	FINANCIAL TRANSACTION
39	2/14/2014	RANDY ELIESEL SANTOS	Withdrawal of approximately \$1,500 from Chase Bank account ending in 5009, in Hollywood, Florida
40	2/19/2014	RANDY ELIESEL SANTOS	Withdrawal of approximately \$6,400 from Chase Bank account ending in 5009, in Hollywood, Florida
41	2/20/2014	RANDY ELIESEL SANTOS	Withdrawal of approximately \$2,000 from Chase Bank account ending in 5009, in Hollywood, Florida
42	2/25/2014	RANDY ELIESEL SANTOS	Withdrawal of approximately \$7,000 from Chase Bank account ending in 5009, in Hollywood, Florida
43	2/26/2014	RANDY ELIESEL SANTOS	Chips debit of approximately \$75,000 from Chase Bank account ending in 5009, in Hollywood, Florida, to Banco do Brasil account ending in 0110, in New York
44	2/26/2014	RANDY ELIESSAL SANTOS	Withdrawal of approximately \$8,500 from Chase Bank account ending in 5009, in Hollywood, Florida

Jean Champions Trade Accounts

COUNT	APPROX. DATE	DEFENDANT	FINANCIAL TRANSACTION
45	7/7/2014	JEAN-PHILIPPE ETIENNE	Withdrawal of approximately \$5,400 from TD Bank account ending in 8519, in Pembroke Pines, Florida
46	7/7/2014	JEAN-PHILIPPE ETIENNE	Withdrawal of approximately \$1,000 from TD Bank account ending in 8519, in Pembroke Pines, Florida
47	7/9/2014	JEAN-PHILIPPE ETIENNE	Withdrawal of approximately \$87,700 from Bank of America account ending in 8201, in Pembroke Pines, Florida
48	7/11/2014	JEAN-PHILIPPE ETIENNE	Withdrawal of approximately \$105,000 from Bank of America account ending in 8201, in Pembroke Pines, Florida

It is further alleged that the specified unlawful activity is wire fraud, in violation of Title 18, United States Code, Section 1343, and bank fraud in violation of Title 18, United States Code, Section 1344(1) and (2).

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

COUNT 49
CONSPIRACY TO COMMIT BANK FRAUD AND WIRE FRAUD
(18 U.S.C. § 1349)

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

2. From in or around March, 2013, continuing through in or around September, 2014, in Miami-Dade, Broward, and Palm Beach Counties, in the Southern District of Florida, and elsewhere, the defendants,

LUIS ANGEL DE JESUS ALFONSECA PUJOLS,
a/k/a “Luis Alfonseca Pujols,”

**a/k/a “Luis A. Alfonseca,”
a/k/a “Luis Alfonseca,”
a/k/a “Luigi,”
GARY ALBERTO CAMILO,
a/k/a “Gary Alberto Camilo Florencio,”
JEAN-PHILIPPE ETIENNE,
a/k/a “Jean-Phillipe Hughes Etienne,”
a/k/a “Jean Etienne,”
KARINA MARIE OCASIO,
a/k/a “Karina Matos,”
RANDY ELIESSEL SANTOS,
a/k/a “Randy E. Santos,” and
COSME DANIEL ENRIQUE VASQUEZ,
a/k/a “Cosme D. Vazquez,”
a/k/a “Cosme Vasquez,”**

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 other persons known and unknown to the Grand Jury:

(a) to knowingly, and with intent to defraud, execute, and cause the execution of, a scheme and artifice to defraud one or more financial institutions, including Bank of America, Citibank, Chase Bank, PNC Bank, SunTrust Bank, TD Bank, and Wells Fargo 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, by means of false and fraudulent pretenses, representations, and promises relating to a material fact, in violation of Title 18, United States Code, Section 1344(1) and (2); and

(b) to knowingly, and with intent to defraud, devise, and intend to devise, a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that they were false and fraudulent

when made, and transmitting and causing to be transmitted in interstate commerce, by means of wire communication, certain writings, signs, signals, pictures and sounds, for the purpose of executing the scheme and artifice, in violation of Title 18, United States Code, Section 1343.

PURPOSE OF THE CONSPIRACY

3. It was the purpose 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: (a) incorporating shell companies; (b) opening bank accounts in the names of the shell companies at financial institutions; (c) defrauding and making false and fraudulent pretenses, representations, and promises to various financial institutions, including Bank of America, Citibank, Chase Bank, PNC Bank, SunTrust Bank, TD Bank, and Wells Fargo Bank, regarding the purpose and use of the shell companies' accounts the defendants and their co-conspirators opened at those financial institutions; and (d) using false and fraudulent pretenses, representations and promises to induce various persons to wire-transfer money to the shell companies' accounts.

MANNER AND MEANS OF THE CONSPIRACY

The manner and means by which the defendants sought to accomplish the conspiracy included, among other things, the following:

4. **LUIS ANGEL DE JESUS ALFONSECA PUJOLS, GARY ALBERTO CAMILO, JEAN-PHILIPPE ETIENNE, KARINA MARIE OCASIO, RANDY ELIESSEL SANTOS, and COSME DANIEL ENRIQUE VASQUEZ**, incorporated or caused other persons to incorporate various shell companies with the Florida Department of State, including, but not limited to: Camilo International Trading; Cosme Global Trades; Jean Champions Trade; Luis Global Investments; Ocasio Trades; Santos Global Sales; Barcelo Max Trades; DB Wholesale Prices; JF Smart Connections; JG Planet Trades; JR True Connections; JR Vast Enterprises, and

United Wire Metal.

5. **LUIS ANGEL DE JESUS ALFONSECA PUJOLS, GARY ALBERTO CAMILO, JEAN-PHILIPPE ETIENNE, KARINA MARIE OCASIO, RANDY ELIESSEL SANTOS, COSME DANIEL ENRIQUE VASQUEZ,** and certain co-conspirators whom they recruited, opened bank accounts at financial institutions in the names of shell companies, including, but not limited to: Camilo International Trading; Cosme Global Trades; Jean Champions Trade; Luis Global Investments; Ocasio Trades; Santos Global Sales; Barcelo Max Trades; DB Wholesale Prices; JF Smart Connections; JG Planet Trades; JR True Connections; JR Vast Enterprises; and United Wire Metal. Further, **ALFONSECA, CAMILO, ETIENNE, OCASIO, SANTOS, VASQUEZ,** and certain co-conspirators whom they recruited, used false and fraudulent pretenses and made false and fraudulent representations to the financial institutions, to make it appear that the shell companies were legitimate businesses, and they falsely and fraudulently failed to disclose to the financial institutions that the shell companies had no substantial legitimate business activities.

6. **LUIS ANGEL DE JESUS ALFONSECA PUJOLS, GARY ALBERTO CAMILO, JEAN-PHILIPPE ETIENNE,** and **RANDY ELIESSEL SANTOS,** possessed, and provided other co-conspirators with a written script to use if a financial institution inquired about a shell company's business. The script, typically entitled "Non Products Inc.," set forth a number of false and fraudulent statements regarding the shell company's business. For example, one version of the script falsely and fraudulently stated, in part:

PURPOSE: TO OFFER OUR CLIENTS THE LOWEST PRICES IN NON-PERISHABLE GOODS SUCH AS FURNITURE, TEXTILES, LAPTOPS, AND ELECTRONICS AND MORE AT WHOLESALE DISTRIBUTOR PRICING. WE ARE A COMMISSION BASED COMPANY AND SERVE AS THE MIDDLE MAN BETWEEN THE BUYERS AND THE SELLERS.

OUR CLIENTS INIATE (*sic*) THE CONTACT VIA TELEPHONE OR E-MAIL, AND ARE MOSTLY REFERRED TO US BY WORD OF MOUTH, SEMINARS, OR ACQUAINTAINCES LIKE OLD HIGH SCHOOL AND COLLEGE FRIENDS.

WE IMPORT OUR PRODUCTS MOSTLY FROM VENDORS IN CHINA, HONG KONG, SPAIN, ITALY, FRANCE AND OTHER AREAS OVERSEAS. OUR PRODUCTS ARE USD APPROVED TO ASSURE OUR DOMESTIC CLIENTELE THAT WE CAN OFFER THE LOWEST PRICES WITHOUT SACRIFICING QUALITY.

WE CONTACT OUR RESPECTIVE SUPPLIERS TO SEE WHO IS OFFERING THE LOWEST PRICES ON THE ITEMS OUR CLIENTS WANT.

WE CREATE AN INVOICE WITH OUR MARKED UP PRICES TO THE CLIENTS. THAT IS THE PERCENTAGE OF PROFIT WE MAKE WHICH RANGES BETWEEN 2 AND 5 PERCENT DEPENDING ON THE DEAL.

THE ONLY ACCEPTED METHOD OF PAYMENT IS WIRE TRANSFERS BECAUSE IT EXPEDITES THE PROCESS FOR BOTH THE BUYERS AND SELLERS. ONCE THE CLIENTS WIRE THE FUNDS TO OUR ACCOUNT WHICH CAN RANGE FROM 10,000 TO 200,000 PER MONTH, WE ORDER THE ITEMS THEY NEED, FROM OUR SUPPLIERS AND WE WIRE THE FUNDS TO THE SUPPLIERS. WE EXPECT AN AVERAGE OF INCOMING AND OUTGOING WIRES OF ABOUT 9 AND 6 PER MONTH.

DEPENDING ON THE PRODUCT THE SUPPLIER CHARGES AND DELIVERY TIME VARY FOR SHIPPING AND HANDLING IF NECESSARY. WE DON'T HOLD OR KEEP POSSESSION OF THE GOODS SINCE THEY ARE SHIPPED DIRECTLY FROM THE SUPPLIER TO THE BUYER ELIMINATING ANY NEED FOR WAREHOUSING EXPENSES FOR OUR COMPANY....

7. In March and July, 2013, **COSME DANIEL ENRIQUE VASQUEZ** opened the following bank accounts in the name of Cosme Global Trades Inc. (the “Cosme Global Trades accounts”) for use in the fraud scheme:

Date Opened	Bank and Branch	Account No. Ending In
3/8/2013	TD Bank, N.A., (Store # 871), 16200 N.W. 57th Avenue, Miami Lakes, Florida 33014	6745

Date Opened	Bank and Branch	Account No. Ending In
3/11/2013	Wells Fargo Bank, N.A., (Store # 10811), 15615 N.W. 67th Avenue, Miami Lakes, Florida 33014	0835
3/11/2013	SunTrust Bank, (Cost Center # 7026060), Miami Lakes Office, 15101 Northwest 67th Avenue, Miami Lakes, Florida 33014	5832
7/25/2013	PNC Bank, N.A., (Branch # 00235), 400 North Federal Highway Fort Lauderdale, Florida 33301	9717

8. In August and October, 2013, **GARY ALBERTO CAMILO** opened the following bank accounts in the name of Camilo International Trading Inc. (the “Camilo International Trading accounts”) for use in the fraud scheme:

Date Opened	Bank and Branch	Account No. Ending In
8/10/2013	JPMorgan Chase Bank, N.A., (West Country Club – 744452), 18600 N.W. 87th Avenue, Unit 129, Hialeah, Florida 33015	8595
8/10/2013	Wells Fargo Bank, N.A., (Store # 11063), Country Club, 6707 N.W. 186th Street, Hialeah, Florida 33015	3536
8/12/2013	SunTrust Bank, (Cost Center # 6070446), Pines at Paraiso, 15701 Pines Boulevard, Pembroke Pines, Florida 33027	0243
8/12/2013	TD Bank, N.A., (Store # 3138) Pembroke Lakes, 11825 Pines Boulevard, Pembroke Pines, Florida 33026	8608
10/22/2013	PNC Bank, N.A., (Branch # 00241), Miramar West, 14495 Miramar Parkway, Miramar, Florida 33027	1675

9. In December, 2013, and February, 2014, **LUIS ANGEL DE JESUS ALFONSECA PUJOLS** opened the following bank accounts in the name of Luis Global Investments Inc. (“the Luis Global Investments accounts”) for use in the fraud scheme:

Date Opened	Bank and Branch	Account No. Ending In
12/2/2013	Wells Fargo Bank, N.A., (Store # 10865), Weston Commons, 4511 Weston Road, Weston, Florida 33331	0240
12/2/2013	SunTrust Bank, (Cost Center # 6074361), South Weston Office, 4480 Weston Road, Davie, 33331	9277
12/3/2013	JPMorgan Chase Bank, N.A., (Country Club Hialeah – 741751), 18575 N.W. 67th Avenue, Miami, Florida 33015	7255
12/3/2013	TD Bank, N.A., (Store # 3138) Pembroke Lakes, 11825 Pines Boulevard, Pembroke Pines, Florida 33026	0964
2/12/2014	PNC Bank, N.A., (Branch # 00242), 4499 Weston Road, Weston, Florida 33331	2601
2/28/2014	Citibank, N.A., (# 0175), Weston Town Center, 1636 Town Center Circle, Weston, Florida 33326	1209

10. In December, 2013, **KARINA MARIE OCASIO** opened the following bank accounts in the name of Ocasio Trades Inc. (the “Ocasio Trades accounts”) for use in the fraud scheme:

Date Opened	Bank and Branch	Account No. Ending In
12/17/2013	Wells Fargo Bank, N.A., (Store # 10784), Boca Sandalfoot Cove, 22893 Sandalfoot Plaza Drive, Boca Raton, Florida 33428	9092
12/21/2013	PNC Bank, N.A. (Branch # 00715), Hillsboro & 441, 6990 N. State Road 7, Coconut Creek, Florida 33073	4126

11. In January and March, 2014, **RANDY ELIESSEL SANTOS** opened the following bank accounts in the name of Santos Global Sales Inc. (the “Santos Global Sales accounts”) for use in the fraud scheme:

Date Opened	Bank and Branch	Account No. Ending In
1/9/2014	JPMorgan Chase Bank, N.A., (Young Circle – 748559), 1701 East Young Circle, Hollywood, Florida 33020	5009
1/9/2014	PNC Bank, N.A., (Branch # 240) Young Circle, 1837 Tyler Street, Hollywood, Florida 33020	9905
3/24/2014	TD Bank, N.A., (Store # 933) 5171 Sheridan Street, Hollywood, Florida 33021	1308

12. In June and July, 2014, **JEAN-PHILIPPE ETIENNE** opened the following bank accounts in the name of Jean Champions Trade Inc. (the “Jean Champions Trade accounts”) for use in the fraud scheme:

Date Opened	Bank and Branch	Account No. Ending In
6/12/2014	Bank of America, N.A., Pembroke Lakes, 11150 Taft Street, Pembroke Pines, Florida 33026	8201
6/12/2014	Wells Fargo Bank, N.A. (Store # 10775), Pembroke Lakes, 10480 Taft Street, Pembroke Pines, Florida 33026	6055
6/16/2014	TD Bank, N.A., (Store # 3138) Pembroke Lakes, 11825 Pines Boulevard, Pembroke Pines, Florida 33026	8519
7/9/2014	JPMorgan Chase Bank, N.A., (Miramar Commons – 741995), 11100 Pembroke Road, Miramar, Florida 33025	6835

13. Certain of the defendants’ co-conspirators employed various schemes and artifices to defraud, and made false and fraudulent pretenses, representations, and promises, to induce various persons to wire-transfer money and funds in interstate commerce to the shell companies’ bank accounts, including, but not limited to: the Camilo International Trading accounts; the Cosme Global Trades accounts; the Jean Champions Trade accounts; the Luis Global Investments

accounts; the Ocasio Trades accounts; and the Santos Global Sales accounts. The schemes and artifices to defraud, and the false and fraudulent pretenses, representations, and promises, included:

- a. on-line romance schemes, where fraudsters posing as a man or woman initiate on-line relationship with a victim, and persuade the victim to send them money via wire-transfer to a shell company account;
- b. “advance fee” schemes, where fraudsters persuade the victim to pay various fees and costs to obtain the proceeds of a fictitious contract or inheritance;
- c. counterfeit check kiting, where fraudsters persuade a victim to deposit a counterfeit cashier’s check in the victim’s bank account and wire-transfer the proceeds to a shell company account, before the counterfeit check is returned;
- d. computer hacking, where fraudsters install software on a victim’s computer system, which generates the payment of funds to a shell company account;
- e. “email spoofing” schemes, where fraudsters use a forged email address to divert the payment of money owed to a creditor, to a shell company account; and
- f. check forgery, where fraudsters deposit a forged check in a shell company account.

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

COUNTS 50-76
BANK FRAUD
(18 U.S.C. § 1344)

1. The General Allegations section of this Indictment is re-alleged and fully incorporated herein by reference
2. From in or around March, 2013, continuing through in or around September, 2014, in Miami-Dade, Broward, and Palm Beach Counties, in the Southern District of Florida, and

elsewhere, the defendants,

LUIS ANGEL DE JESUS ALFONSECA PUJOLS,
a/k/a “Luis Alfonseca Pujols,”
a/k/a “Luis A. Alfonseca,”
a/k/a “Luis Alfonseca,”
a/k/a “Luigi,”
GARY ALBERTO CAMILO,
a/k/a “Gary Alberto Camilo Florencio,”
JEAN-PHILIPPE ETIENNE,
a/k/a “Jean-Phillipe Hughes Etienne,”
a/k/a “Jean Etienne,”
KARINA MARIE OCASIO,
a/k/a “Karina Matos,”
RANDY ELIESSEL SANTOS,
a/k/a “Randy E. Santos,” and
COSME DANIEL ENRIQUE VASQUEZ,
a/k/a “Cosme D. Vazquez,”
a/k/a “Cosme Vasquez,”

did knowingly, and with intent to defraud, execute, attempt to execute, and cause the execution of, a scheme and artifice to defraud one or more financial institutions, including Bank of America, Citibank, Chase Bank, PNC Bank, SunTrust Bank, TD Bank, Wells Fargo Bank, which scheme and artifice employed a material falsehood, and did knowingly execute, attempt to 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, 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), and 2.

PURPOSE OF THE SCHEME AND ARTIFICE

3. It was the purpose of the scheme and artifice for the defendants and their accomplices to unlawfully enrich themselves and others and to further the fraud scheme by, among other things: (a) incorporating shell companies; (b) opening bank accounts in the names of the shell companies at financial institutions; (c) defrauding and making false and fraudulent pretenses,

representations, and promises to various financial institutions, including Bank of America, Citibank, Chase Bank, PNC Bank, SunTrust Bank, TD Bank, and Wells Fargo Bank, regarding the purpose and use of the shell companies' accounts the defendants and their co-conspirators opened at those financial institutions; and (d) using false and fraudulent pretenses, representations and promises to induce various persons to wire-transfer money to the shell companies' accounts.

THE SCHEME AND ARTIFICE

4. The Manner and Means section of Count 49 of the Indictment is re-alleged and fully incorporated herein by reference as a description of the scheme and artifice.

EXECUTION OF THE SCHEME AND ARTIFICE

5. On or about the dates specified below, in Miami-Dade, Broward, and Palm Beach Counties, in the Southern District of Florida, and elsewhere, the defendants, as specified below, did execute, attempt to execute, and cause the execution of, the aforesaid scheme and artifice to defraud financial institutions, and obtain moneys and funds owned by and under the custody and control of financial institutions, as more particularly described below:

Cosme Global Trades Accounts

COUNT	APPROX. DATE	DEFENDANT	ACT IN EXECUTION OF SCHEME AND ARTIFICE
50	4/16/2013	COSME DANIEL ENRIQUE VASQUEZ	Wire-transfer of approximately \$125,935 from Bank of America account ending in 5210, to TD Bank account ending in 6745, in Miami Lakes, Florida
51	4/19/2013	COSME DANIEL ENRIQUE VASQUEZ	Wire-transfer of approximately \$28,642 from Wells Fargo Bank account ending in 7690, to SunTrust Bank account ending in 5832, in Miami Lakes, Florida

COUNT	APPROX. DATE	DEFENDANT	ACT IN EXECUTION OF SCHEME AND ARTIFICE
52	5/7/2013	COSME DANIEL ENRIQUE VASQUEZ	Wire-transfer of approximately \$60,000 from Bank of Oklahoma account ending in 1668, to TD Bank account ending in 6745, in Miami Lakes, Florida

Camilo International Trading Accounts

COUNT	APPROX. DATE	DEFENDANT	ACT IN EXECUTION OF SCHEME AND ARTIFICE
53	9/3/2013	GARY ALBERTO CAMILO	Wire-transfer of approximately \$5,000 from Tri Counties Bank account ending in 0215, to Chase Bank account ending in 8595, in Hialeah, Florida
54	11/13/2013	GARY ALBERTO CAMILO	Wire-transfer of approximately \$13,000 from People's United Bank account ending in 9964, to PNC Bank account ending in 1675, in Miramar, Florida
55	11/14/2013	GARY ALBERTO CAMILO	Wire-transfer of approximately \$36,970 from People's United Bank account ending in 9964, to PNC Bank account ending in 1675, in Miramar, Florida

Luis Global Investments Accounts

COUNT	APPROX. DATE	DEFENDANT	ACT IN EXECUTION OF SCHEME AND ARTIFICE
56	12/10/2013	LUIS ANGEL DE JESUS ALFONSECA PUJOLS	Wire transfer of approximately \$100,000 from Bank of America account ending in 7100, to Wells Fargo Bank account ending in 0240, in Weston, Florida
57	12/16/2013	LUIS ANGEL DE JESUS ALFONSECA PUJOLS	Wire transfer of approximately \$179,720 from Farmers State Bank account ending in 2252, to TD Bank account ending in 0964, in Pembroke Pines, Florida

COUNT	APPROX. DATE	DEFENDANT	ACT IN EXECUTION OF SCHEME AND ARTIFICE
58	12/19/2013	LUIS ANGEL DE JESUS ALFONSECA PUJOLS	Wire transfer of approximately \$35,000 from Community State Bank of Canton savings account ending in 6474 (related to checking account ending in 4076), to Wells Fargo Bank account ending in 0240, in Weston, Florida
59	12/24/2013	LUIS ANGEL DE JESUS ALFONSECA PUJOLS	Wire transfer of approximately \$5,000 from DeMotte State Bank account ending in 3018, to SunTrust Bank account ending in 9277, in Davie, Florida
60	12/26/2013	LUIS ANGEL DE JESUS ALFONSECA PUJOLS	Deposit of approximately \$200,000 in Wells Fargo Bank account ending in 0240, in Weston, Florida
61	12/27/2013	LUIS ANGEL DE JESUS ALFONSECA PUJOLS	Wire transfer of approximately \$5,000 from DeMotte State Bank account ending in 3018, to SunTrust Bank account ending in 9277, in Davie, Florida
62	2/7/2014	LUIS ANGEL DE JESUS ALFONSECA PUJOLS	Wire-transfer of approximately \$20,000 from Citibank account ending in 8339, to Chase Bank account ending in 7255, in Miami, Florida
63	2/11/2014	LUIS ANGEL DE JESUS ALFONSECA PUJOLS	Wire-transfer of approximately \$20,000 from Citibank account ending in 8339, to Chase Bank account ending in 7255, in Miami, Florida
64	3/3/2014	LUIS ANGEL DE JESUS ALFONSECA PUJOLS	Wire transfer of approximately \$52,000 from Westerra Credit Union account ending in 2103, to PNC Bank account ending in 2601, in Weston, Florida

Ocasio Trades Accounts

COUNT	APPROX. DATE	DEFENDANT	ACT IN EXECUTION OF SCHEME AND ARTIFICE
65	1/6/2014	KARINA MARIE OCASIO	Wire-transfer of approximately \$30,000 from People's United Bank account ending in 2177, to Wells Fargo Bank account ending in 9092, in Boca Raton, Florida
66	1/28/2014	KARINA MARIE OCASIO	Wire-transfer of approximately \$254,293 from TD Bank account ending in 5564, to PNC Bank account ending in 4126, in Coconut Creek, Florida

Santos Global Sales Accounts

COUNT	APPROX. DATE	DEFENDANT	ACT IN EXECUTION OF SCHEME AND ARTIFICE
67	2/3/2014	RANDY ELIESEL SANTOS	Wire-transfer of approximately \$10,000 from Rabobank account ending in 2619, to PNC Bank account ending in 9905, in Hollywood, Florida
68	2/13/2014	RANDY ELIESEL SANTOS	Wire-transfer of approximately \$30,000 from Citibank account ending in 8339, to Chase Bank account ending in 5009, in Hollywood, Florida
69	2/18/2014	RANDY ELIESEL SANTOS	Wire-transfer of approximately \$160,000 from Bank of America account ending in 8871, to Chase Bank account ending in 5009, in Hollywood, Florida
70	2/24/2014	RANDY ELIESEL SANTOS	Wire-transfer of approximately \$300,000 from Citibank account ending in 8339, to Chase Bank account ending in 5009, in Hollywood, Florida
71	4/7/2014	RANDY ELIESEL SANTOS	CCD deposit of approximately \$2,269,521.77 from Wells Fargo Bank account ending in 0102, to TD Bank account ending in 1308, in Hollywood, Florida

COUNT	APPROX. DATE	DEFENDANT	ACT IN EXECUTION OF SCHEME AND ARTIFICE
72	4/7/2014	RANDY ELIESSEL SANTOS	CCD deposit of approximately \$946,957.92 from Wells Fargo Bank account ending in 0102, to TD Bank account ending in 1308, in Hollywood, Florida

Jean Champions Trade Accounts

COUNT	APPROX. DATE	DEFENDANT	ACT IN EXECUTION OF SCHEME AND ARTIFICE
73	7/3/2014	JEAN-PHILIPPE ETIENNE	Wire-transfer of approximately \$42,271 from Chase Bank account ending in 2792, to TD Bank account ending in 8519, in Pembroke Pines, Florida
74	7/8/2014	JEAN-PHILIPPE ETIENNE	Wire-transfer of approximately \$92,750 from PNC Bank account ending in 5363, to Bank of America account ending in 8201, in Pembroke Pines, Florida
75	7/10/2014	JEAN-PHILIPPE ETIENNE	Chips debit/wire-transfer of approximately \$93,000 from Chase Bank account ending in 2150, to Bank of America account ending in 8201, in Pembroke Pines, Florida
76	7/10/2014	JEAN-PHILIPPE ETIENNE	Deposit of check no. 124, dated on or about July 7, 2014, drawn on Bank of America account ending in 0099, for the amount of approximately \$975,000, payable to Jean Champions Trade Inc., with memo "Capital trading," in TD Bank account ending in 8519, in Pembroke Pines, Florida

In violation of Title 18, United States Code, Sections 1344(1) and (2), and 2.

FORFEITURE
(18 U.S.C. §§ 981, 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 the defendant, **LUIS ANGEL DE JESUS ALFONSECA PUJOLS**, a/k/a “Luis Alfonseca Pujols,” a/k/a “Luis A. Alfonseca,” a/k/a “Luis Alfonseca,” a/k/a “Luigi,” **GARY ALBERTO CAMILO**, a/k/a “Gary Alberto Camilo Florencio,” **JEAN-PHILIPPE ETIENNE**, a/k/a “Jean-Phillipe Hughes Etienne,” a/k/a “Jean Etienne,” **KARINA MARIE OCASIO**, a/k/a “Karina Matos,” **RANDY ELIESSEL SANTOS**, a/k/a “Randy E. Santos,” and **COSME DANIEL ENRIQUE VASQUEZ**, a/k/a “Cosme D. Vazquez,” a/k/a “Cosme Vasquez,” have an interest including, but not limited to, the following:

- a. Approximately Fifteen Million Three Hundred Thousand Dollars (\$15,300,000.00) in U.S. currency, in that such sum in aggregate are proceeds from violations of conspiracy to commit bank fraud and substantive bank fraud, conspiracy to commit money laundering and substantive money laundering or funds traceable thereto.

2. Upon conviction of a violation of Title 18, United States Code, Sections 1344 or 1349, as alleged in this Indictment, the defendant shall forfeit to the United States any property constituting or derived from proceeds the person obtained as a result of the violation, pursuant to Title 18, United States Code, Section 982(a)(2). The property subject to forfeiture includes, but is not limited to, the following:

- a. Approximately \$28,246.78 remaining on deposit in JPMorgan Chase Bank, account number XXXXXXXX8595, in the name of Camilo International Trading Inc., with signatory listed as Gary Alberto Camilo, located at JP Morgan Chase Bank, at a branch located at 18600 N.W. 87th Avenue, Unit 129, Hialeah, Florida.
- b. Approximately \$99,847.02 remaining on deposit in JPMorgan Chase Bank, account number XXXXXXXX5009, in the name of Santos Global Sales Inc., with signatory listed as Randy Eliessel Santos, located at JPMorgan

Chase Bank, at a branch located at 1701 East Young Circle, Hollywood, Florida.

- c. Approximately \$4,300.00 remaining on deposit in JPMorgan Chase Bank, account number XXXXXXXXXXX6835, in the name of Jean Champions Trade, Inc., with signatory listed as Jean-Philippe Etienne, located at JPMorgan Chase Bank, at a branch located at 11100 Pembroke Road, Miramar, Florida.

3. Upon conviction of a violation of Title 18 United States Code, Section 1956 as alleged in this Indictment, the defendant 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). The property subject to forfeiture includes, but is not limited to, the following:

- a. Approximately \$28,246.78 remaining on deposit in JPMorgan Chase Bank, account number XXXXXXXXXXX8595, in the name of Camilo International Trading Inc., with signatory listed as Gary Alberto Camilo, located at JPMorgan Chase Bank, at a branch at 18600 N.W. 87th Avenue, Unit 129, Hialeah, Florida.
- b. Approximately \$99,847.02 remaining on deposit in JPMorgan Chase Bank, account number XXXXXXXXXXX5009, in the name of Santos Global Sales Inc., with signatory listed as Randy Eliessel Santos, located at JPMorgan Chase Bank, at a branch located at 1701 East Young Circle, Hollywood, Florida.
- c. Approximately \$4,300.00 remaining on deposit in JPMorgan Chase Bank, account number XXXXXXXXXXX6835, in the name of Jean Champions Trade Inc., with signatory listed as Jean-Philippe Etienne, located at JPMorgan Chase Bank, at a branch located at 11100 Pembroke Road, Miramar, Florida.

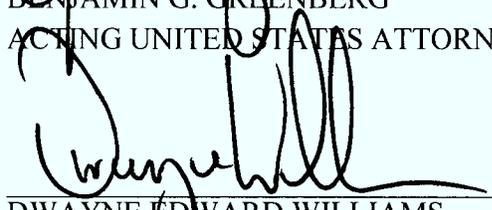
4. All pursuant to Title 18, United States Code, Section 982(a)(1), Title 18, United States Code, Section 981(a)(1)(C), as made applicable by Title 28, United States Code, Section 2461(c), and the procedures set forth in Title 21 United States Code, Section 853.

A TRUE BILL

 /
FOREF



BENJAMIN G. GREENBERG
ACTING UNITED STATES ATTORNEY



DWAYNE EDWARD WILLIAMS
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES OF AMERICA

CASE NO. _____

vs.

CERTIFICATE OF TRIAL ATTORNEY*

Luis Angel De Jesus Alfonseca Pujols, et al.,

Defendants.

_____ /

Superseding Case Information:

Court Division: (Select One)

New Defendant(s) Yes ___ No ___

X Miami _____ Key West

Number of New Defendants _____

_____ FTL _____ WPB _____ FTP

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 15 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 _____
II 11 to 20 days	<u>X</u>	Misdem. _____
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? (Yes or No) No

If yes:

Judge: _____ Case No.: _____

(Attach copy of dispositive order)

Has a complaint been filed in this matter? (Yes or No) 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? (Yes or No) 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

DWAYNE E. WILLIAMS
ASSISTANT UNITED STATES ATTORNEY
Florida Bar No. 0125199

*Penalty Sheet(s) attached

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
PENALTY SHEET

Defendant's Name: Luis Angel De Jesus Alfonseca Pujols

Case No: _____

Count #: 1

Conspiracy to Commit Money Laundering

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

*** Max. Penalty:** Twenty (20) years' imprisonment

Counts #: 9-16

International Money Laundering

Title 18, United States Code, Section 1956(a)(2)(B)(i)

*** Max. Penalty:** Twenty (20) years' imprisonment as to each count

Counts #: 30-37

Money Laundering

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

*** Max. Penalty:** Twenty (20) years' imprisonment as to each count

Count #: 49

Conspiracy to Commit Bank Fraud and Wire Fraud

Title 18, United States Code, Section 1349

*** Max. Penalty:** Thirty (30) years' imprisonment

Counts #: 56-64

Bank Fraud

Title 18, United States Code, Section 1344

*** Max. Penalty:** Thirty (30) years' imprisonment as to each count

*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: Gary Alberto Camilo

Case No: _____

Count #: 1

Conspiracy to Commit Money Laundering

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

*** Max. Penalty:** Twenty (20) years' imprisonment

Counts #: 5-8

International Money Laundering

Title 18, United States Code, Section 1956(a)(2)(B)(i)

*** Max. Penalty:** Twenty (20) years' imprisonment as to each count

Count #: 29

Money Laundering

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

*** Max. Penalty:** Twenty (20) years' imprisonment

Count #: 49

Conspiracy to Commit Bank Fraud and Wire Fraud

Title 18, United States Code, Section 1349

*** Max. Penalty:** Thirty (30) years' imprisonment

Counts #: 53-55

Bank Fraud

Title 18, United States Code, Section 1344

*** Max. Penalty:** Thirty (30) years' imprisonment as to each count

*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: Jean-Philippe Etienne

Case No: _____

Count #: 1

Conspiracy to Commit Money Laundering

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

*** Max. Penalty:** Twenty (20) years' imprisonment

Count #: 25

International Money Laundering

Title 18, United States Code, Section 1956(a)(2)(B)(i)

*** Max. Penalty:** Twenty (20) years' imprisonment

Counts #: 45-48

Money Laundering

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

*** Max. Penalty:** Twenty (20) years' imprisonment as to each count

Count #: 49

Conspiracy to Commit Bank Fraud and Wire Fraud

Title 18, United States Code, Section 1349

*** Max. Penalty:** Thirty (30) years' imprisonment

Counts #: 73-76

Bank Fraud

Title 18, United States Code, Section 1344

*** Max. Penalty:** Thirty (30) years' imprisonment as to each count

*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: Karina Marie Ocasio

Case No: _____

Count #: 1

Conspiracy to Commit Money Laundering

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

*** Max. Penalty:** Twenty (20) years' imprisonment

Count #: 38

Money Laundering

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

*** Max. Penalty:** Twenty (20) years' imprisonment

Count #: 49

Conspiracy to Commit Bank Fraud and Wire Fraud

Title 18, United States Code, Section 1349

*** Max. Penalty:** Thirty (30) years' imprisonment

Counts #: 65-66

Bank Fraud

Title 18, United States Code, Section 1344

*** Max. Penalty:** Thirty (30) years' imprisonment as to each count

*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: Randy Eliessel Santos

Case No: _____

Count #: 1

Conspiracy to Commit Money Laundering

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

*** Max. Penalty:** Twenty (20) years' imprisonment

Counts #: 17-24

International Money Laundering

Title 18, United States Code, Section 1956(a)(2)(B)(i)

*** Max. Penalty:** Twenty (20) years' imprisonment as to each count

Counts #: 39-44

Money Laundering

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

*** Max. Penalty:** Twenty (20) years' imprisonment as to each count

Count #: 49

Conspiracy to Commit Bank Fraud and Wire Fraud

Title 18, United States Code, Section 1349

*** Max. Penalty:** Thirty (30) years' imprisonment

Counts #: 67-72

Bank Fraud

Title 18, United States Code, Section 1344

*** Max. Penalty:** Thirty (30) years' imprisonment as to each count

*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: Cosme Daniel Enrique Vasquez

Case No: _____

Count #: 1

Conspiracy to Commit Money Laundering

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

*** Max. Penalty:** Twenty (20) years' imprisonment

Counts #: 2-4

International Money Laundering

Title 18, United States Code, Section 1956(a)(2)(B)(i)

*** Max. Penalty:** Twenty (20) years' imprisonment as to each count

Counts #: 26-28

Money Laundering

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

*** Max. Penalty:** Twenty (20) years' imprisonment as to each count

Count #: 49

Conspiracy to Commit Bank Fraud and Wire Fraud

Title 18, United States Code, Section 1349

*** Max. Penalty:** Thirty (30) years' imprisonment

Counts #: 50-52

Bank Fraud

Title 18, United States Code, Section 1344

*** Max. Penalty:** Thirty (30) years' imprisonment as to each count

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