

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. **17-20432**

18 U.S.C. § 1347

18 U.S.C. § 1956(h)

18 U.S.C. § 1956(a)(1)(B)(i)

53 U.S.C. § 5324(a)(3)

18 U.S.C. § 2

18 U.S.C. § 982(a)(7)

CR-MARTINEZ
OTAZO-REYES

UNITED STATES OF AMERICA

vs.

CARLOS BARROSO,
ANDRES PEREZ,
ROLANDO PEREZ, and
REINIEL GARCIA
a/k/a "Reinier Garcia,"

Defendants.

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

The Medicare Program

1. The Medicare Program ("Medicare") was a federally funded program that provided free or below-cost health care benefits to certain individuals, primarily the elderly, blind, and disabled. The benefits available under Medicare were governed by federal statutes and regulations. The United States Department of Health and Human Services ("HHS"), through its agency, the

Centers for Medicare and Medicaid Services (“CMS”), oversaw and administered Medicare. Individuals who received benefits under Medicare were commonly referred to as Medicare “beneficiaries.”

2. Medicare was a “health care benefit program,” as defined by Title 18, United States Code, Section 24(b), and a Federal health care program, as defined by Title 42, United States Code, Section 1320a-7b(f).

3. Medicare programs covering different types of benefits were separated into different program “parts.” “Part A” of Medicare program covered certain eligible home health care costs for medical services provided by a home health agency (“HHA”), also referred to as a “provider,” to persons who already qualified for Medicare and who additionally required home health services because of an illness or disability that caused them to be homebound.

4. CMS did not directly pay Medicare Part A claims submitted by Medicare-certified HHAs. CMS contracted with different private companies to administer the Medicare Part A program throughout different parts of the United States. In the State of Florida, CMS contracted with Palmetto Government Benefits Administrators (“Palmetto”). As administrator, Palmetto was to receive, adjudicate and pay claims submitted by HHA providers under the Part A program for home health claims. Additionally, CMS separately contracted with companies in order to review HHA providers’ claims data. CMS first contracted with TriCenturion, a Program Safeguard Contractor. Subsequently, on December 15, 2008, CMS contracted with SafeGuard Services, a Zone Program Integrity Contractor. Both TriCenturion and SafeGuard Services safeguarded the Medicare Trust Fund by reviewing HHA providers’ claims for potential fraud, waste, and/or abuse.

5. Physicians, clinics and other health care providers, including HHAs, that provided services to Medicare beneficiaries were able to apply for and obtain a “provider number.” A health care provider that received a Medicare provider number was able to file claims with Medicare to obtain reimbursement for services provided to beneficiaries. A Medicare claim was required to set forth, among other things, the beneficiary’s name and Medicare information number, the services that were performed for the beneficiary, the date that the services were provided, the cost of the services, and the name and provider number of the physician or other health care provider who ordered the services.

Part A Coverage and Regulations

Reimbursements

6. The Medicare Part A program reimbursed 100% of the allowable charges for participating HHAs providing home health care services only if the patient qualified for home health benefits. A patient qualified for home health benefits only if the patient:

- (a) was confined to the home, also referred to as homebound;
- (b) was under the care of a physician who specifically determined there was a need for home health care and established the Plan of Care (“POC”); and
- (c) the determining physician signed a certification statement specifying that the beneficiary needed intermittent skilled nursing, physical therapy, speech therapy, or a continued need for occupational therapy; the beneficiary was confined to the home; that a POC for furnishing services was established and periodically reviewed; and that the services were furnished while the beneficiary was under the care of the physician who established the POC.

Record Keeping Requirements

7. Medicare Part A regulations required HHAs providing services to Medicare patients to maintain complete and accurate medical records reflecting the medical assessment and diagnoses of the patients, as well as records documenting the actual treatment of patients to whom services were provided and for whom claims for reimbursement were submitted by the HHA. These medical records were required to be sufficiently complete to permit Medicare, through Palmetto and other contractors, to review the appropriateness of Medicare payments made to the HHA under the Part A program.

8. Among the written records required to document the appropriateness of home health care claims submitted under Part A of Medicare were: (i) a POC that included the physician order, diagnoses, types of services/frequency of visits, prognosis/rehab potential, functional limitations/activities permitted, medications/treatments/nutritional requirements, safety measures/discharge plans, goals and the physician's signature; and (ii) a signed certification statement by an attending physician certifying that the patient was confined to his or her home and was in need of the planned home health services.

9. Medicare Part A regulations required provider HHAs to maintain medical records of every visit made by a nurse, therapist, and home health aide to a beneficiary. The record of a nurse's visit was required to describe, among other things, any significant observed signs or symptoms, any treatment and drugs administered, any reactions by the patient, any instruction provided to the patient and the understanding of the patient, and any changes in the patient's physical or emotional condition. The home health nurse, therapist and aide were required to document the hands-on personal care provided to the beneficiary as the services were deemed necessary to maintain the

beneficiary's health or to facilitate treatment of the beneficiary's primary illness or injury. These written medical records were generally created and maintained in the form of "clinical notes" and "home health aide notes/observations."

The Defendants and Related Companies

10. Sweet Home Services, Inc. ("Sweet Home"), located at 1865 Brickell Avenue, #A209, Miami, FL, was incorporated on or about February 9, 2005, and did business in Miami-Dade County, in the Southern District of Florida, purportedly providing skilled nursing services to Medicare beneficiaries that required home health services.

11. Defendant **CARLOS BARROSO**, a resident of Miami-Dade County, in the Southern District of Florida, was the owner and sole officer, director, and registered agent of Sweet Home.

12. AP Pharmacy Inc. ("AP Pharmacy"), located at 5757 SW 8 Street, Suite 117, Miami, FL, was incorporated on or about May 31, 2012, and purported to do business in Miami-Dade County, in the Southern District of Florida.

13. CMS Health Staffing Corp. ("CMS Health Staffing"), located at 273 NW 63 Court, Miami, FL, was incorporated on or about March 20, 2013, and purported to do business in Miami-Dade County, in the Southern District of Florida.

14. Complete Staffing Resource ("Complete Staffing Resource"), located at 273 NW 63 Court, Miami, FL, was incorporated on or about March 15, 2013, and purported to do business in Miami-Dade County, in the Southern District of Florida.

15. Computer Equipment Leasing, Inc. (“Computer Equipment Leasing”), located at 7939 W. 28 Avenue, Miami, FL, was incorporated on or about March 14, 2013, and purported to do business in Miami-Dade County, in the Southern District of Florida.

16. One Health Source, Inc. (“One Health Source”), located at 273 NW 63 Court, Miami, FL, was incorporated on or about March 21, 2013, and purported to do business in Miami-Dade County, in the Southern District of Florida.

17. Trade Staffing Solutions, Inc. (“Trade Staffing Solutions”), located at 273 NW 63 Court, Miami, FL, was incorporated on or about March 18, 2013, and purported to do business in Miami-Dade County, in the Southern District of Florida.

18. Defendant **ANDRES PEREZ**, a resident of Miami-Dade County, in the Southern District of Florida, was the owner and sole officer and registered agent of AP Pharmacy, CMS Health Staffing, Complete Staffing Resource, Computer Equipment Leasing, One Health Source, and Trade Staffing Solutions.

19. Century Professional Staffing, Inc. (“Century Professional Staffing”), located at 41 NE 12th Avenue, Homestead, FL, was incorporated on or about March 12, 2013, and purported to do business in Miami-Dade County, in the Southern District of Florida.

20. Perez Software & Tech, Inc. (“Perez Software & Tech”), located at 41 NE 12th Avenue, Homestead, FL, was incorporated on or about March 13, 2013, and purported to do business in Miami-Dade County, in the Southern District of Florida.

21. Super Cleaning Organization, Inc. (“Super Cleaning Organization”), located at 41 NE 12th Avenue, Homestead, FL, was incorporated on or about February 28, 2013, and purported to do business in Miami-Dade County, in the Southern District of Florida.

22. Florida Advertizing Group, Inc. (“Florida Advertizing Group”), located at 41 NE 12th Avenue, Homestead, FL, incorporated on or about March 13, 2013, and purported to do business in Miami-Dade County, in the Southern District of Florida.

23. Defendant **ROLANDO PEREZ**, a resident of Homestead, FL, in Miami-Dade County, in the Southern District of Florida, was the owner and sole officer and registered agent of Century Professional Staffing, Perez Software & Tech, Super Cleaning Organization, and Florida Advertizing Group.

24. Miami Best Therapy, Inc. (“Miami Best Therapy”), located at 3971 NW 66 Avenue, Virginia Gardens, FL, was incorporated on or about January 24, 2012, and purported to do business in Miami-Dade County, in the Southern District of Florida.

25. Cosme Staffing Solutions, Inc. (“Cosme Staffing Solutions”), located at 3971 NW 66 Avenue, Virginia Gardens, FL, was incorporated on or about March 25, 2013, and purported to do business in Miami-Dade County, in the Southern District of Florida.

26. Miami Company Consulting, Inc. (“Miami Company Consulting”), located at 3971 NW 66 Avenue, Virginia Gardens, FL, was incorporated on or about January 23, 2012, and purported to do business in Miami-Dade County, in the Southern District of Florida.

27. Defendant **REINIEL GARCIA**, a resident of Modesto, CA, was the owner, sole officer, and registered agent of Miami Best Therapy, Cosme Staffing Solutions, and Miami Company Consulting.

COUNTS 1-7
Health Care Fraud
(18 U.S.C. § 1347)

1. Paragraphs 1 through 17 of the General Allegations section in this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

2. From in or around February of 2013, through in or around July of 2013, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

CARLOS BARROSO,

in connection with the delivery of and payment for health care benefits, items, and services, did knowingly and willfully, in concert with others known and unknown to the Grand Jury, execute, and attempt to execute, a scheme and artifice to defraud Medicare, a health care benefit program affecting commerce, as defined by Title 18, United States Code, Section 24(b), and to obtain, by means of materially false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of, Medicare, that is, the defendant submitted and caused the submission of false and fraudulent claims to Medicare, seeking reimbursement for the cost of various home health services.

Purpose of the Scheme and Artifice

3. It was the purpose of the scheme and artifice for the defendant and his accomplices to unlawfully enrich themselves by, among other things: (a) submitting and causing the submission of false and fraudulent claims to Medicare; (b) concealing the submission of false and fraudulent claims to Medicare; and (c) diverting fraud proceeds for their personal use and benefit of themselves, the use and benefit of others, and to further the fraud.

The Scheme and Artifice

4. **CARLOS BARROSO** caused Sweet Home to submit false and fraudulent claims to Medicare seeking payment for home health services that were not medically necessary and not provided to Medicare beneficiaries.

5. As a result of these false and fraudulent claims, **CARLOS BARROSO** caused Medicare to make payments to Sweet Home in the approximate sum of \$8.4 million.

6. **CARLOS BARROSO** diverted the fraud proceeds for the personal use and benefit of himself and his accomplices and to further the fraud.

Acts in Execution or Attempted Execution of the Scheme and Artifice

7. On or about the dates set forth as to each count below, in Miami-Dade County, in the Southern District of Florida, and elsewhere, **CARLOS BARROSO**, in connection with the delivery of and payment for health care benefits, items, and services, did knowingly and willfully execute, and attempt to execute, the above-described scheme and artifice to defraud a health care benefit program affecting commerce, that is, Medicare, and to obtain, by means of materially false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of said health care benefit program, in that he submitted and caused the submission of false and fraudulent Medicare claims seeking reimbursement for the cost of home health care services that were not prescribed by doctors or provided to Medicare beneficiaries as claimed:

Count	Beneficiary	Document Control Number	Purported Date of Service	Approximate Amount Paid
1	Individual A	21305700258907FLR	2/19/2013	\$3,413
2	Individual B	21306800127407FLR	3/4/2013	\$3,098

Count	Beneficiary	Document Control Number	Purported Date of Service	Approximate Amount Paid
3	Individual C	21309901331807FLR	3/28/2013	\$2,780
4	Individual D	21311600056607FLR	4/12/2013	\$3,074
5	Individual E	21313603745207FLR	5/3/2013	\$3,098
6	Individual F	21319601236007FLR	6/17/2013	\$2,780
7	Individual G	21319803576507FLR	6/25/2013	\$3,098

In violation of Title 18, United States Code, Sections 1347 and 2.

COUNT 8
Conspiracy to Commit Money Laundering
(18 U.S.C. § 1956(h))

Beginning in or around February 2013, through in or around October 2013, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

CARLOS BARROSO,
ANDRES PEREZ,
ROLANDO PEREZ, and
REINIEL GARCIA,
a/k/a “Reinier Garcia,”

did willfully, that is, with the intent to further the object of the conspiracy, and knowingly combine, conspire, and agree with each other and with others, known and unknown to the Grand Jury, to violate Title 18, United States Code, Section 1956, that is, to knowingly conduct a financial transaction affecting interstate commerce, which financial transaction involved the proceeds of specified unlawful activity, knowing that the property involved in such financial transaction represented the proceeds of some form of unlawful activity, and knowing that the 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).

It is further alleged that the specified unlawful activity is health care fraud in violation of Title 18, United States Code, Section 1347.

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

COUNTS 9-17
Money Laundering
(18 U.S.C. § 1956(a)(1)(B)(i))

On or about the dates set forth below as to each count, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants identified in each count did knowingly conduct and attempt to conduct a financial transaction affecting interstate commerce, which financial 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 and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of specified unlawful activity as set forth below:

Count	Defendant	Approximate Date of Transaction	Description of Financial Transaction
9	ROLANDO PEREZ	3/27/2013	The withdrawal of approximately \$5,000 in cash from Century Professional Staffing's Wells Fargo account ending in 7554
10	ROLANDO PEREZ	3/27/2013	The negotiation of check number 992, drawn on Perez Software & Tech's Bank of America account ending in 9198, in the approximate amount of \$5,210

Count	Defendant	Approximate Date of Transaction	Description of Financial Transaction
11	ROLANDO PEREZ	3/27/2013	The negotiation of check number 98, drawn on Super Cleaning Organization's Total Bank's account ending in 6706, in the approximate amount of \$7,165
12	ANDRES PEREZ	4/4/2013	The negotiation of check number 4748, drawn on Complete Staffing Resource's Wells Fargo account ending in 9227, in the approximate amount of \$7,340
13	ANDRES PEREZ	4/4/2013	The withdrawal of approximately \$8,300 in cash from One Health Source's SunTrust account ending in 4194
14	ANDRES PEREZ	4/4/2013	The withdrawal of approximately \$4,000 in cash from Trade Staffing Solutions's TD Bank account ending in 6581
15	REINIEL GARCIA a/k/a "Renier Garcia"	5/17/2013	The withdrawal of approximately \$4,900 in cash from Miami Company Consulting's SunTrust account ending in 4090
16	REINIEL GARCIA a/k/a "Renier Garcia"	5/17/2013	The withdrawal of approximately \$5,800 in cash from Miami Best Therapy's TD Bank account ending in 1898
17	REINIEL GARCIA a/k/a "Renier Garcia"	5/17/2013	The withdrawal of approximately \$5,600 in cash from Cosme Staffing Solutions's Citibank account ending in 9347

It is further alleged that the specified unlawful activity is health care fraud, in violation of Title 18, United States Code, Section 1347.

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

COUNTS 18-20
Structuring to Avoid Reporting Requirements
(31 U.S.C. § 5324(a)(3))

1. A "currency transaction report" ("CTR") is a report that is submitted on United States Department of Treasury ("Treasury"), Financial Crimes Enforcement Network Form 104.

A domestic financial institution is required by federal law to file a CTR with Treasury for each financial transaction that involves United States currency in excess of \$10,000. Such financial transactions include deposits, withdrawals, or exchanges of currency, or other transactions involving the physical transfer of currency from one person to another.

2. On or about the dates specified as to each count below, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants, as listed in each count, did knowingly and for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a), and the regulations promulgated thereunder, structure and assist in structuring, and attempt to structure and assist in structuring, transactions with domestic federally-insured financial institutions:

Count	Defendant	Approximate Date of Transactions	Description of Financial Transactions
18	ROLANDO PEREZ	3/27/2013	The withdrawal of approximately \$5,000 in cash from Century Professional Staffing's Wells Fargo account ending in 7554
			The negotiation of check number 992, drawn on Perez Software & Tech's Bank of America account ending in 9198, in the approximate amount of \$5,210
			The negotiation of check number 98, drawn on Super Cleaning Organization's Total Bank's account ending in 6706, in the approximate amount of \$7,165
19	ANDRES PEREZ	4/4/2013	The negotiation of check number 4748, drawn on Complete Staffing Resource's Wells Fargo account ending in 9227, in the approximate amount of \$7,340
			The withdrawal of approximately \$8,300 in cash from One Health Source's SunTrust account ending in 4194
			The withdrawal of approximately \$4,000 in cash from Trade Staffing Solutions's TD Bank account ending in 6581

Count	Defendant	Approximate Date of Transactions	Description of Financial Transactions
20	REINIEL GARCIA a/k/a "Renier Garcia"	5/17/2013	The withdrawal of approximately \$4,900 in cash from Miami Company Consulting's SunTrust account ending in 4090
			The withdrawal of approximately \$5,800 in cash from Miami Best Therapy's TD Bank account ending in 1898
			The withdrawal of approximately \$5,600 in cash from Cosme Staffing Solutions's Citibank account ending in 9347

In violation of Title 31, United States Code, Section 5324(a)(3) and 5324(d); Title 31, Code of Federal Regulations, Part 103; and Title 18, United States Code, Section 2.

FORFEITURE
(18 U.S.C. § 982(a)(7))

1. The allegations 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 certain property in which defendants **CARLOS BARROSO, ANDRES PEREZ, ROLANDO PEREZ,** and **REINIEL GARCIA, a/k/a "Renier Garcia,"** have an interest.

2. Upon conviction of a violation of Title 18, United States Code, Section 1347, as alleged in Counts 1 through 7 of this Indictment, defendant **CARLOS BARROSO** shall forfeit to the United States any property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offense, pursuant to Title 18, United States Code, Section 982(a)(7).

3. Upon conviction of a violation of Title 18, United States Code, Section 1956, as alleged in Counts 8 through 17 of this Indictment, the defendants **CARLOS BARROSO, ANDRES PEREZ, ROLANDO PEREZ,** and **REINIEL GARCIA, a/k/a "Renier Garcia,"** shall each forfeit to the United States any property, real or personal, that is involved in the offense, or

any property traceable to such property, pursuant to Title 18, United States Code, Section 982(a)(1).

4. Upon conviction of a violation of Title 31, United States Code, Section 5324, as alleged in Counts 18 through 20 of the Indictment, the defendants **ANDRES PEREZ, ROLANDO PEREZ**, and **REINIEL GARCIA, a/k/a “Renier Garcia,”** shall each forfeit to the United States any property, real or personal, that is involved in the offense, or any property traceable thereto, pursuant to Title 31, United States Code, Section 5317(c).

5. The property subject to forfeiture includes, but is not limited to, approximately \$8.4 million in U.S. currency, which the United States may seek as a forfeiture money judgment.

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

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


the United States shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).


All pursuant to Title 18, United States Code, Section 982(a)(1) and 982(a)(7), Title 31, United States Code, Section 5317(c), and the procedures set forth in Title 21, United States Code, Section 853.

A TRUE BILL,


F


BENJAMIN G. GREENBERG
ACTING UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF FLORIDA


JOSEPH BEEMSTERBOER
DEPUTY CHIEF
CRIMINAL DIVISION, FRAUD SECTION
U.S. DEPARTMENT OF JUSTICE


TIMOTHY P. LOPEL
TRIAL ATTORNEY
CRIMINAL DIVISION, FRAUD SECTION
U.S. DEPARTMENT OF JUSTICE

UNITED STATES OF AMERICA

CASE NO. _____

vs.

CARLOS BARROSO,
ANDRES PEREZ,
ROLANDO PEREZ, and
REINIEL GARCIA,
a/k/a "Reinier Garcia,"

Defendant.

CERTIFICATE OF TRIAL ATTORNEY*

Superseding Case Information:

Court Division: (Select One)

X Miami Key West
 FTL 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) Yes
List language and/or dialect Spanish
4. This case will take 3-5 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	<u> X </u>	Petty	<u> </u>
II	6 to 10 days	<u> </u>	Minor	<u> </u>
III	11 to 20 days	<u> </u>	Misdem.	<u> </u>
IV	21 to 60 days	<u> </u>	Felony	<u> X </u>
V	61 days and over	<u> </u>		

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 No X

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 No X


TIMOTHY P. LOPER
DOJ TRIAL ATTORNEY
Court ID No. A5502016

*Penalty Sheet(s) attached

REV 5/3/17

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: CARLOS BARROSO

Case No: _____

Counts #: 1 - 7

Health Care Fraud

Title 18, United States Code, Section 1347

***Max Penalty:** Ten (10) years' imprisonment

Count #: 8

Conspiracy to Commit Money Laundering

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

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

Count #:

***Max Penalty:** _____

Count #:

***Max Penalty:** _____

***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: ANDRES PEREZ

Case No: _____

Count #: 8

Conspiracy to Commit Money Laundering

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

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

Counts #: 12 - 14

Money Laundering

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

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

Count #: 19

Structuring to Avoid Reporting Requirements

Title 31, United States Code, Section 5324(a)(3)

***Max Penalty:** Five (5) years' imprisonment

Count #:

***Max Penalty:** _____

***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: ROLANDO PEREZ

Case No: _____

Count #: 8

Conspiracy to Commit Money Laundering

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

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

Counts #: 9 – 11

Money Laundering

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

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

Count #: 18

Structuring to Avoid Reporting Requirements

Title 31, United States Code, Section 5324(a)(3)

***Max Penalty:** Five (5) years' imprisonment

Count #:

***Max Penalty:** _____

***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: REINIEL GARCIA, a/k/a "Reinier Garcia"

Case No: _____

Count #: 8

Conspiracy to Commit Money Laundering

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

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

Counts #: 15 - 17

Money Laundering

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

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

Count #: 20

Structuring to Avoid Reporting Requirements

Title 31, United States Code, Section 5324(a)(3)

***Max Penalty:** Five (5) years' imprisonment

Count #: _____

***Max Penalty:** _____

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