

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Jul 11, 2017

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

**17-20492-CR-MARTINEZ/OTAZO-REYES**

18 U.S.C. § 1956(h)

18 U.S.C. § 1957(a)

18 U.S.C. § 2

18 U.S.C. § 982

UNITED STATES OF AMERICA

vs.

YAILYN MARIMON  
and  
YAMILKA ECHEVARRIA,  
a/k/a "Yamilka Martinez,"

Defendants.

**INDICTMENT**

The Grand Jury charges that:

**COUNT 1**

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

From in or around July 2008, through in or around the present, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**YAILYN MARIMON  
and  
YAMILKA ECHEVARRIA  
a/k/a "Yamilka Martinez,"**

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 others known and unknown to the Grand Jury, that is:

- a. to knowingly conduct a financial transaction affecting interstate and foreign

commerce, involving 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); and

b. to knowingly engage and attempt to engage, in monetary transactions 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 a specified unlawful activity, in violation of Title 18, United States Code, Section 1957.

It is further alleged that the specified unlawful activity is health care fraud, in violation of Title 18, United States Code, Section 1347, and wire fraud, in violation of Title 18, United States Code, Section 1343.

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

**COUNTS 2-3**  
**Money Laundering**  
**(18 U.S.C. § 1957(a))**

On or about the dates set forth as to each count below, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**YAILYN MARIMON**  
**and**  
**YAMILKA ECHEVARRIA,**  
**a/k/a “Yamilka Martinez,”**

did knowingly engage and attempt to engage in monetary transactions affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, and such property having been derived from specified unlawful activity, knowing that the property involved in the

monetary transactions was derived from some form of unlawful activity, as more specifically described below:

<b>Count</b>	<b>Defendant</b>	<b>Approximate Date of Transaction</b>	<b>Description of Monetary Transaction</b>
<b>2</b>	<b>YAILYN MARIMON</b>	07/23/2012	The deposit of approximately \$100,000 into JP Morgan Chase account number ending 5219 in the name of Florida Real Estate Investment Trust Investors via check number 343, drawn on Washington Mutual account ending 6751 in the name of <b>YAILYN MARIMON</b>
<b>3</b>	<b>YAMILKA ECHEVARRIA a/k/a "Yamilka Martinez,"</b>	07/24/2012	The deposit of approximately \$150,000 into JP Morgan Chase account number ending 2257 in the name of <b>YAMILKA ECHEVARRIA</b> via check number 1150, drawn on Bank of America account ending 7415 in the name of Bluetree Management.

It is further alleged that the specified unlawful activity is health care fraud, in violation of Title 18, United States Code, Section 1347, and wire fraud, in violation of Title 18, United States Code, Section 1343.

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

**FORFEITURE**  
**(18 U.S.C. § 982)**

1. The allegations contained in this Indictment are re-alleged 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 the defendants, **YAILYN MARIMON** and **YAMILKA ECHEVARRIA, a/k/a "Yamilka Martinez,"** have an interest.

2. Upon conviction of a conspiracy to violate or a violation of Title 18, United States

Code, Section 1956 and Section 1957, as alleged in Counts 1 through 3 of this Indictment, the defendants **YAILYN MARIMON** and **YAMILKA ECHEVARRIA, a/k/a “Yamilka Martinez,”** 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). Further, this sum may be sought as a forfeiture money judgment against the defendant.

3. The property to be forfeited includes, but is not limited to, a forfeiture money judgment in the amount of at least \$9,807,915.

4. If any of the property described above, 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 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), including but not limited to:

- f. the real property located at 201 SW 78th Place, Miami, FL 33144;
- g. the real property located at 211 SW 78th Place, Miami, FL 33144;
- h. the real property located at 333 W. Kings Way, Winter Park, FL 32789;

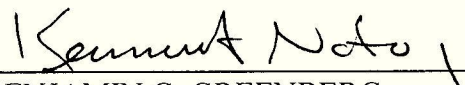


- i. the real property located at 10462 SW 21st Street, Miami, FL 33165; and
- j. the real property located at 937 Baltimore Drive, Orlando, FL 32810.

All pursuant to Title 18, United States Code, Section 982(a)(1) and the procedures set forth in Title 21, United States Code, Section 853, as incorporated by Title 18, United States Code, Section 982(b)(1).

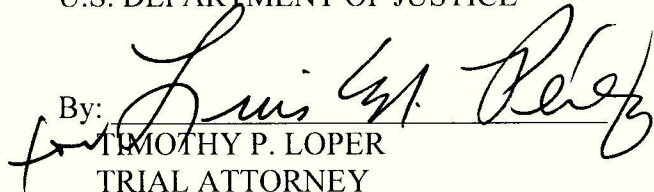
A TRUE BILL,

\_\_\_\_\_  
FOREPERSON

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

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

By:

  
\_\_\_\_\_  
TIMOTHY P. LOPER  
TRIAL ATTORNEY  
CRIMINAL DIVISION, FRAUD SECTION  
U.S. DEPARTMENT OF JUSTICE

UNITED STATES OF AMERICA

CASE NO. \_\_\_\_\_

v.

**CERTIFICATE OF TRIAL ATTORNEY\***

**YAILYN MARIMON and  
YAMILKA ECHEVARRIA,  
a/k/a "Yamila Martinez,"**

**Defendants.**

**Court Division:** (Select One)

X  Miami   Key West  
  FTL   WPB   FTP

**Superseding Case Information:**

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  days for the parties to try.
5. Please check appropriate category and type of offense listed below:

(Check only one)

- I   0 to 5 days  
II   6 to 10 days  
III   11 to 20 days  
IV   21 to 60 days  
V   61 days and over

(Check only one)

- Petty    
Minor    
Misdem.    
Felony  X

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 \_\_\_\_\_

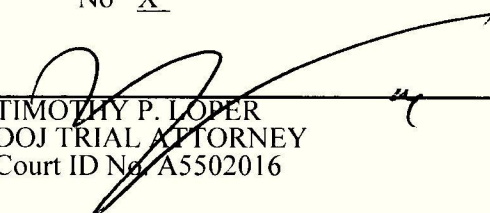
Defendant(s) in state custody as of \_\_\_\_\_

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. LOPEZ  
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:** YAILYN MARIMON

**Case No:** \_\_\_\_\_

Count #: 1

Conspiracy to Commit Money Laundering

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

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

Count #: 2

Money Laundering

Title 18, United States Code, Section 1957

**\*Max Penalty:** Ten (10) 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:** YAMILKA ECHEVARRIA, a/k/a "Yamilka Martinez"

**Case No:** \_\_\_\_\_

Count #: 1

Conspiracy to Commit Money Laundering

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

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

Count #: 3

Money Laundering

Title 18, United States Code, Section 1957

**\*Max Penalty:** Ten (10) 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.**