

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

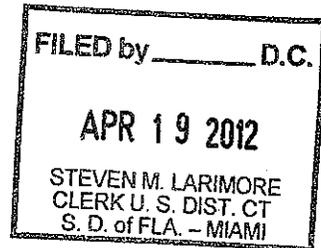
Case No.

**12-60091**

**CR-WILLIAMS**

**MAGISTRATE JUDGE  
SNOW**

18 U.S.C. § 1956(h)  
18 U.S.C. § 1957  
18 U.S.C. § 1956(A)(1)(B)(i)  
18 U.S.C. § 2  
18 U.S.C. § 982



**UNITED STATES OF AMERICA**

vs.

**MARITZA LORZA and  
JAMES VELASCO,**

**Defendants.**

**INDICTMENT**

The Grand Jury charges that:

**GENERAL ALLEGATIONS**

At all times relevant to this Indictment:

**The Defendants and Their Companies**

1. Celebration Home Services, Inc. ("Celebration") was a Florida company, incorporated on or about October 5, 2005, with its principal place of business in Broward County, in the Southern District of Florida. **MARITZA LORZA** was the president, treasurer and registered agent of Celebration. **JAMES VELASCO** was the vice-president and secretary of Celebration. **LORZA** and **VELASCO** controlled Bank of America account no. xxxxxx4036 opened on behalf of Celebration.

2. 4 All Your Needs, Inc. ("4 All Your Needs") was a Florida company, incorporated on or about May 5, 2006, with its principal place of business in Broward County, in the Southern District of Florida. **JAMES VELASCO** was the president, treasurer and registered agent of 4 All Your Needs.

**MARITZA LORZA** was the vice-president and secretary of 4 All Your Needs. **LORZA** and **VELASCO** controlled Bank of America account no. xxxxxx2718 opened on behalf of 4 All Your Needs.

3. VPP Staffing Inc. ("VPP") was a Florida company, incorporated on or about January 5, 2007, with its principal place of business in Broward County, in the Southern District of Florida. **MARITZA LORZA** was the president, treasurer and registered agent of VPP. **LORZA** and **JAMES VELASCO** controlled Bank of America account no. xxxxxxxx5365 opened on behalf of VPP.

4. Work Force Innovations, Co. ("Work Force") was a Florida company, incorporated on or about October 12, 2007, with its principal place of business in Broward County, in the Southern District of Florida. **MARITZA LORZA** was the president, treasurer and registered agent of Work Force. **JAMES VELASCO** was the vice-president and secretary of Work Force. **LORZA** and **VELASCO** controlled Bank of America account no. xxxxxxxx4708 opened on behalf of Work Force.

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

1. Paragraphs 1 through 4 of the General Allegations section of this Indictment are realleged and incorporated by reference as if fully set forth herein.

2. From on or about January 12, 2006, and continuing through on or about December 18, 2009, in Broward County, in the Southern District of Florida, and elsewhere, the defendants,

**MARITZA LORZA**  
**and**  
**JAMES VELASCO,**

did willfully, that is, with the intent to further the object of the conspiracy, and knowingly combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury, to commit the following violations:

(a) to knowingly conduct a financial transaction affecting interstate commerce, which transaction involved the proceeds of specified unlawful activity, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, and knowing that such transaction was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i);

(b) to knowingly engage and attempt to engage in a monetary transaction affecting interstate commerce, by, through, and to, a financial institution involving criminally derived property of a value greater than \$10,000, such property having been derived from specified unlawful activity in violation of Title 18, United States Code, Section 1957.

3. 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 2-10**  
**Money Laundering**  
**(18 U.S.C. § 1956(a)(1)(B)(i))**

1. Paragraphs 1 through 4 of the General Allegations section of this Indictment are realleged and incorporated by reference as if fully set forth herein.

2. On or about the dates specified as to each count below, in Broward County, in the Southern District of Florida, and elsewhere, the defendants

**MARITZA LORZA**  
**and**  
**JAMES VELASCO,**

did knowingly conduct and attempt to conduct a financial transaction affecting interstate commerce,

which transaction involved the proceeds of specified unlawful activity, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, and knowing that 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, as set forth below:

Count	Approximate Date of Transaction	Description of Financial Transaction
2	05/03/2007	The deposit of approximately \$5,000 into Bank of America Account xxxxxx5365 via Check No. 2271, drawn on the account of Bou Inc. and made payable to <b>VPP Staffing, Inc.</b>
3	05/25/2007	The deposit of approximately \$5,500 into Bank of America Account xxxxxx4036 via Check No. 1712, drawn on the account of Font & Bou Rehab Associates, Inc. and made payable to <b>Celebration Home Services, Inc.</b>
4	07/12/2007	The deposit of approximately \$6,400 into Bank of America Account xxxxxx5365 via Check No. 1817, drawn on the account of Font & Bou Rehab Associates, Inc. and made payable to <b>VPP Staffing, Inc.</b>
5	11/28/2007	The deposit of approximately \$5,500 into Bank of America Account xxxxxx4036 via Check No. 2059, drawn on the account of Font & Bou Rehab Associates, Inc. and made payable to <b>Celebration Home Services, Inc.</b>
6	04/02/2008	The deposit of approximately \$5,500 into Bank of America Account xxxxxx4708 via Check No. 2506, drawn on the account of Start Therapy, Inc. and made payable to <b>Work Force Innovations, Co.</b>

<b>Count</b>	<b>Approximate Date of Transaction</b>	<b>Description of Financial Transaction</b>
7	12/29/2008	The deposit of approximately \$5,400 into Bank of America Account xxxxxx4036 via Check No. 2843, drawn on the account of Font & Bou Rehab Associates, Inc. and made payable to <b>Celebration Home Services, Inc.</b>
8	06/09/2009	The deposit of approximately \$5,500 into Bank of America Account xxxxxx4708 via Check No. 3503, drawn on the account of Griffon, Inc. and made payable to <b>Work Force Innovations, Co.</b>
9	09/04/2009	The deposit of approximately \$5,500 into Bank of America Account xxxxxx2718 via Check No. 3617, drawn on the account of Font & Bou Rehab Associates, Inc. and made payable to <b>4 All Your Needs, Inc.</b>
10	12/18/2009	The deposit of approximately \$7,800 into Bank of America Account xxxxxx4036 via Check No. 1254, drawn on the account of Bou Inc. and made payable to <b>Celebration Home Services, Inc.</b>

3. 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 11-14**  
**Money Laundering**  
**(18 U.S.C. § 1957)**

1. Paragraphs 1 through 4 of the General Allegations section of this Indictment are realleged and incorporated by reference as if fully set forth herein

2. On or about the dates specified as to each count below, in Broward County, in the Southern District of Florida, and elsewhere, the defendants,

**MARITZA LORZA**  
**and**  
**JAMES VELASCO,**

did knowingly engage and attempt to engage in a monetary transaction affecting interstate commerce, by, through, and to, a financial institution, involving criminally derived property of a value greater than \$10,000, and such property having been derived from specified unlawful activity.

<b>Count</b>	<b>Approximate Date of Transaction</b>	<b>Description of Monetary Transaction</b>
11	05/31/2007	The deposit of approximately \$14,595 into Bank of America Account xxxxxx2718 via Check No. 1717, drawn on the account Font & Bou Rehab Associates, Inc. and made payable to <b>4 All Your Needs.</b>
12	02/22/2008	The deposit of approximately \$11,137 into Bank of America Account xxxxxx2718 via Check No. 2201, drawn on the account Font & Bou Rehab Associates, Inc. and made payable to <b>4 All Your Needs.</b>
13	10/10/2008	The deposit of approximately \$12,323 into Bank of America Account xxxxxx2718 via Check No. 2623, drawn on the account Font & Bou Rehab Associates, Inc. and made payable to <b>4 All Your Needs.</b>
14	12/15/2008	The deposit of approximately \$16,408 into Bank of America Account xxxxxx2718 via Check No. 2787, drawn on the account Font & Bou Rehab Associates, Inc. and made payable to <b>4 All Your Needs.</b>

3. 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 1957 and 2.

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

1. The allegations contained in Counts 1 through 14 of 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 America of certain property in which the defendants, **MARITZA LORZA** and **JAMES VELASCO**, have an interest.

2. Upon conviction of a violation of, or a conspiracy to violate, Title 18, United States Code, Section 1956 or 1957, as alleged in this Indictment, the defendant so convicted shall forfeit to the United States all of his or her right, title and interest in any property, real or personal, involved in such violation, or in any property traceable to such property, pursuant to Title 18, United States Code, Section 982(a)(1).

3. If any property described as being subject to forfeiture in paragraph 2, above, as a result of any act or omission of either or both 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 subdivided

without difficulty; it is the intent of the United States to seek forfeiture of any other property of either of the defendants up to the value of the above forfeitable property, pursuant to Title 21, United States Code, Section 853(p).

4. The property subject to forfeiture as substitute property, pursuant to Title 21, United States Code, Section 853(p), includes, but is not limited to, the following:

Real property known and numbered as 1134 Areca Way, Weston, Florida 33327, together with all appurtenances, improvements and attachments thereon.

5. The United States will seek a forfeiture money judgment against the defendants,

jointly and severally, as part of any sentence in the following amount:

\$2,800,000 in United States currency, which is a sum of money equal in value to the property, real or personal, involved in the violations alleged in this Indictment, and the property traceable to such property.

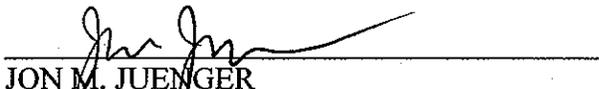
All pursuant to Title 18, United States Code, Section 982(a)(1) and the procedures set forth at Title 21, United States Code, Section 853, as made applicable by Title 18, United States Code, Section 982(b)(1).

A TRUE BILL

FOR PERSON



WIFREDO A. FERRER  
UNITED STATES ATTORNEY

  
JON M. JUENGER  
ASSISTANT UNITED STATES ATTORNEY