

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

11-20470 CC-LENARD
Case No.

18 U.S.C. § 1956(h)
31 U.S.C. § 5332(a)
21 U.S.C. § 853
31 U.S.C. § 5317(c)(1)
31 U.S.C. § 5332(b)(2)

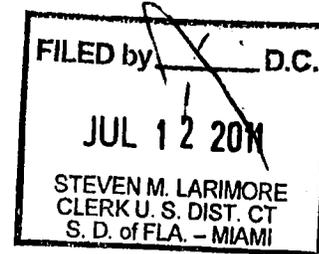
MAGISTRATE JUDGE
O'SULLIVAN

UNITED STATES OF AMERICA

vs.

**ALVARO LOPEZ TARDON,
ARTEMIO LOPEZ TARDÓN,
FABIANI KRENTZ,
DAVID WILLIAM POLLACK,
a/k/a "Maverick," and
VINCENTE ORLANDO CARDELLE,
a/k/a "Padrino,"**

Defendants.



INDICTMENT

The Grand Jury charges that:

COUNT 1

Beginning in or around 2001, and continuing until the return of this Indictment, the exact dates being unknown to the Grand Jury, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**ALVARO LOPEZ TARDON,
ARTEMIO LOPEZ TARDON,
FABIANI KRENTZ, and
DAVID WILLIAM POLLACK,
a/k/a "Maverick,"**

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

1. to 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, knowing that the transaction was designed in whole and in part to:

(a) to conceal and disguise the nature, location, source, ownership and control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i);

(b) to avoid a transaction reporting requirement under State and Federal law, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii);

2. to transport, transmit and transfer funds to a place in the United States from a place outside the United States, knowing that the funds involved in the transportation, transmission and transfer represented the proceeds of some form of unlawful activity, and knowing that the transportation, transmission and transfer was designed in whole and in part to:

(a) conceal and disguise the nature, location, source, ownership and control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i);

(b) to avoid a transaction reporting requirement under State or Federal law, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(ii);

3. to knowingly engage in a monetary transaction by, through, and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value

greater than \$10,000, such property having been derived from specified unlawful activity, in violation of Title 18, United States Code, Section 1957.

It is further alleged that the specified unlawful activity is the manufacture, importation, sale or distribution of a controlled substance, punishable under the laws of the United States, Spain and Colombia.

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

COUNT 2

On or about April 12, 2011, at Miami International Airport, in Miami-Dade County, in the Southern District of Florida, the defendant,

**VINCENTE ORLANDO CARDELLE,
a/k/a "Padrino,"**

with the intent to evade a currency reporting requirement under Title 31, United States Code, Section 5316, did knowingly conceal more than ten thousand dollars (\$10,000) in foreign currency, that is, twenty-one thousand six hundred five (21,605) Euros, on his person and in any conveyance, and did attempt to transport such foreign currency from a place within the United States to a place outside of the United States, in violation of Title 31, United States Code, Section 5332(a) and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATIONS

1. The allegations of this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendants, **ALVARO LOPEZ TARDON, ARTEMIO LOPEZ TARDON, FABIANI KRENTZ, DAVID WILLIAM POLLACK, a/k/a "Maverick," and VINCENTE ORLANDO CARDELLE, a/k/a "Padrino"** have an interest.

2. Upon conviction of a violation of Title 18, United States Code, Section 1956, as alleged in Count 1 of this Indictment, the defendant so convicted shall forfeit all of his right, title and interest to the United States, 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, 982(a)(1).

3. The property which is subject to forfeiture upon conviction of a violation of Title 18, United States Code, Section 1956 includes, but is not limited to, the following:

(a) Forfeiture Money Judgment: Approximately \$26,443,771 in United States currency, which is a sum of money equal in value to the property involved in the violation alleged in this Indictment, which the United States will seek as a personal money judgment against **ALVARO LOPEZ TARDON, ARTEMIO LOPEZ TARDON, FABIANI KRENTZ** and **DAVID WILLIAM POLLACK, a/k/a "Maverick"** as part of their respective sentence upon conviction.

(b) Automobiles:

(1) One 2008 Bugatti Veyron (Vehicle Identification Number: VF9SA25C08M795118);

(2) One 2003 Ferrari Enzo (Vehicle Identification Number: ZFFCW56A830133927);

(3) One 2010 Rolls-Royce Ghost (Vehicle Identification Number: SCA664S50AUX48905);

(4) One 2006 Mercedes-Benz SLR McLaren (Vehicle Identification Number: WDDAJ76F06M000724);

(5) One 2009 Mercedes-Benz Maybach 57S (Vehicle Identification Number: WDBVF79J89A002576);

(6) One 2011 Mercedes-Benz G-Class (Vehicle Identification Number:

WDCYC7BF8BX190896);

- (7) One 2010 Mercedes-Benz G55K (Vehicle Identification Number:

WDCYC7BF8AX183252);

- (8) One 2005 Bentley Continental GT (Vehicle Identification Number:

SCBCR63WX5C029083);

- (9) One 2006 Mercedes-Benz E350 (Vehicle Identification Number:

WDBUF56J06A806452);

- (10) One 2008 Mercedes-Benz S550 (Vehicle Identification Number:

WDDNG86X78A201264);

- (11) One 2005 Aston Martin DB9 (Vehicle Identification Number:

SCFAD02AX5GB03279);

- (12) One 2006 BMW 325i (Vehicle Identification Number:

WBAVB13546PT02739);

- (13) One 2003 Hummer H2 (Vehicle Identification Number:

5GRGN23U33H139831);

- (14) One 1999 Toyota Camry (Vehicle Identification Number:

4T1BG22K5XU525875);

- (15) One 2010 Mercedes-Benz S63 (Vehicle Identification Number:

WDDNG7HB9AA289039);

- (16) One 2011 Mercedes-Benz G55AMG (Vehicle Identification Number:

WDCYC7BF9BX186582);

- (17) One 2010 Land Rover Range Rover (Vehicle Identification Number:

SALMF1E48AA327736); and

(c) Real Property:

(1) Real property known and numbered as 2475 S. Bayshore Drive, Villa 3, Coconut Grove, FL 33133, with all appurtenances, improvements and attachments thereon;

(2) Real property known and numbered as 100 S Pointe Drive, #3801, Miami Beach, FL 33139, with all appurtenances, improvements and attachments thereon;

(3) Real property known and numbered as 1155 Brickell Bay Drive, #202, Miami, FL 33131, with all appurtenances, improvements and attachments thereon;

(4) Real property known and numbered as 1155 Brickell Bay Drive, #302, Miami, FL 33131, with all appurtenances, improvements and attachments thereon;

(5) Real property known and numbered as 1155 Brickell Bay Drive, #502, Miami, FL 33131, with all appurtenances, improvements and attachments thereon;

(6) Real property known and numbered as 1155 Brickell Bay Drive, #2703, Miami, FL 33131, with all appurtenances, improvements and attachments thereon;

(7) Real property known and numbered as 325 S. Biscayne Blvd., #621, Miami, FL 33130, with all appurtenances, improvements and attachments thereon;

(8) Real property known and numbered as 325 S. Biscayne Blvd., #715, Miami, FL 33130, with all appurtenances, improvements and attachments thereon;

(9) Real property known and numbered as 325 S. Biscayne Blvd., #819, Miami, FL 33130, with all appurtenances, improvements and attachments thereon;

(10) Real property known and numbered as 335 S. Biscayne Blvd., #307, Miami, FL 33130, with all appurtenances, improvements and attachments thereon;

(11) Real property known and numbered as 335 S. Biscayne Blvd., #607, Miami, FL 33130, with all appurtenances, improvements and attachments thereon;

(12) Real property known and numbered as 335 S. Biscayne Blvd., #705, Miami, FL 33130, with all appurtenances, improvements and attachments thereon;

(13) Real property known and numbered as 335 S. Biscayne Blvd., #707, Miami, FL 33130, with all appurtenances, improvements and attachments thereon;

(14) Real property known and numbered as 107 Oselake Way, Hendersonville, NC, with all appurtenances, improvements and attachments thereon;

(15) Real property known and numbered as 1000 S Pointe Dr., Unit #908, Miami Beach, Florida 33139, with all appurtenances, improvements and attachments thereon.

(d) Bank Accounts:

(1) All principal, deposits, interest, dividends and other amounts credited to account number 229020347922 at Bank of America in the name of Alvaro Lopez Tardon;

(2) All principal, deposits, interest, dividends and other amounts credited to account number 3760689920 at Bank of America in the name of Alvaro Tardon, Artemio Lopez Tardon, and Maria D. Tardon Lopez;

(3) All principal, deposits, interest, dividends and other amounts credited to account number 229020364989 at Bank of America in the name of Alvaro Lopez Tardon;

(4) All principal, deposits, interest, dividends and other amounts credited to account number 3768372019 at Bank of America in the name of Alvaro Lopez Tardon and Fabiani Krentz;

(5) All principal, deposits, interest, dividends and other amounts credited to account number 229016239866 at Bank of America in the name of Sharon Cohen, Maria De Las Nieves Tardon Lopez;

(6) All principal, deposits, interest, dividends and other amounts credited to account number 229015785133 at Bank of America in the name of Alvaro Lopez Tardon and MIAONE 2, LLC;

(7) All principal, deposits, interest, dividends and other amounts credited to account number 229015785308 at Bank of America in the name of Alvaro Lopez Tardon and MIAONE 1, LLC;

(8) All principal, deposits, interest, dividends and other amounts credited to account number 229020364989 at Bank of America in the name of Alvaro Lopez Tardon;

(9) All principal, deposits, interest, dividends and other amounts credited to account number 229037949711 at Bank of America in the name of Alvaro Lopez Tardon;

(10) All principal, deposits, interest, dividends and other amounts credited to account number 8042615305 at Branch Banking and Trust (BB&T), f/k/a Colonial Bank in the name of Alvaro Lopez Tardon and MIAONE 1, LLC;

(11) All principal, deposits, interest, dividends and other amounts credited to account number 8048296399 at Branch Banking and Trust (BB&T), f/k/a Colonial Bank in the name of The Collection Sport of Miami and Sharon Cohen;

(12) All principal, deposits, interest, dividends and other amounts credited to account number 8053316819 at Branch Banking and Trust (BB&T), f/k/a Colonial Bank in the name of Alvaro Lopez Tardon;

(13) All principal, deposits, interest, dividends and other amounts credited to account number 1100002143680 at Branch Banking and Trust (BB&T), f/k/a Colonial Bank in the name of Alvaro Lopez Tardon and MIAMARK LLC;

(14) All principal, deposits, interest, dividends and other amounts credited to account number 80532220225 at Branch Banking and Trust (BB&T), f/k/a Colonial Bank in the name of Alvaro Lopez Tardon and MIAMARK LLC;

(15) All principal, deposits, interest, dividends and other amounts credited to account number 3665399205 at Bank of America in the name of Fabiani Krentz;

(16) All principal, deposits, interest, dividends and other amounts credited to account number 1010151739808 at WellsFargo-Wachovia Bank in the name of Fabiani Krentz and FK Kitchen LLC;

(17) All principal, deposits, interest, dividends and other amounts credited to account number 9117815581 at Citibank in the name of Fabiani Krentz;

(18) All principal, deposits, interest, dividends and other amounts credited to account number 9116917354 at Citibank in the name of Fabiani Krentz;

(19) All principal, deposits, interest, dividends and other amounts credited to account number 8980008255329 at Bank of America in the name of David William Pollack;

(20) All principal, deposits, interest, dividends and other amounts credited to account number 4436777819 at Bank of America in the name of David W. Pollack;

(21) All principal, deposits, interest, dividends and other amounts credited to account number 5499482713 at Bank of America in the name of David W. Pollack;

(22) All principal, deposits, interest, dividends and other amounts credited to account number 5566543857 at Bank of America in the name of David W. Pollack;

(23) All principal, deposits, interest, dividends and other amounts credited to account number 9983716386 at WellsFargo-Wachovia Advisor in the name of David William Pollack;

(24) All principal, deposits, interest, dividends and other amounts credited to account number 5093-8341 at WellsFargo-Wachovia Advisor in the name of David Pollack;

(25) All principal, deposits, interest, dividends and other amounts credited to account number 0414-499880 at WellsFargo-Wachovia Advisor in the name of David Pollack;

(26) All principal, deposits, interest, dividends and other amounts credited to account number 17000071220745 at South Florida Educational Federal Credit Union in the name of David William Pollack; and

4. Upon conviction of a violation of Title 31, United States Code, Section 5332, as alleged in Count 2 of this Indictment, **VINCENTE ORLANDO CARDELLE, a/k/a "Padrino,"** shall forfeit all of his right, title and interest to the United States in any property, real or personal, involved in such violation and in any property traceable to such property, pursuant to Title 31, United States Code, Section 5332(b)(2).

5. The property which is subject to forfeiture upon conviction of a violation of Title 31, United States Code, Section 5332 includes, but is not limited to, the following: approximately 10,000 Euros, which was seized from **VINCENTE ORLANDO CARDELLE, a/k/a "Padrino,"** on or about April 12, 2011.

6. If the property described as being subject to forfeiture in this Indictment, as a result of any act or omission of a 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 subdivided without

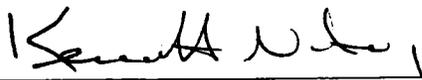
difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants, up to the value of the property described in subparagraphs (a) through (e) of this paragraph and, in addition, to require the defendants to return any such property to the jurisdiction of the Court for seizure and for forfeiture.

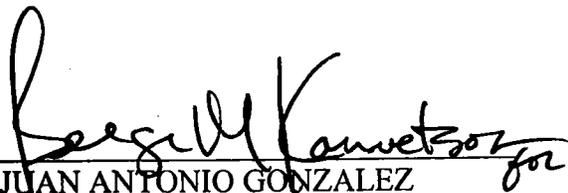
All pursuant to Title 18, United States Code, Section 982(a)(1), Title 31, United States Code, Section 5332(b)(2) and the procedures set forth at Title 21, United States Code, Section 853, as made applicable by Title 18, United States Code, Section 982(b)(1) and Title 31, United States Code, Section 5332(b)(3), respectively.

A TRUE BILL

FOREPERSON



WIFREDO A. FERRER
UNITED STATES ATTORNEY



JUAN ANTONIO GONZALEZ
ASSISTANT UNITED STATES ATTORNEY

Certified to be a true and correct copy of the document on file
Steven M. Larimore, Clerk,
U.S. District Court
Southern District of Florida
By 
Deputy Clerk
Date 07/17/11