

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

UNITED STATES OF AMERICA

Case No. 3:18-cr-21(S1)-J-32JRK

Cts. 1-121: 18 U.S.C. §§ 1343

v.

and 2

Ct. 122: 18 U.S.C. § 371

OSCAR ARNELSON RODRIGUEZ-CRUZ

INDICTMENT

The Grand Jury charges:

COUNT ONE

A. **Introduction**

At all times material to this Indictment:

1. Gedeon Multiservices, Inc. ("Gedeon") was a corporation created on or about November 14, 2016, and registered with the Florida Department of State. Its principal place of business was in Orange County, in the Middle District of Florida. Records of the Florida Department of State reflect that the defendant, OSCAR ARNELSON RODRIGUEZ-CRUZ, was the registered agent and sole officer of the corporation.

2. Under Florida law, any contractor or subcontractor who engages in any public or private construction must secure and maintain workers' compensation insurance. See Fla. Stat. §§ 440.10(1)(a) and 440.38(1). A

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JACKSONVILLE

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contractor must require a subcontractor to provide it with evidence that it has workers' compensation insurance for its workers. Fla. Stat. § 440.10(c). Failure to maintain workers' compensation insurance is a felony. Fla. Stat. § 440.105(4)(a) & (f).

3. Proof of workers' compensation insurance is generally provided in the form of a Certificate of Liability Insurance declaring that the subcontractor has the insurance coverage. The certificate states only that the subcontractor has workers' compensation insurance and does not include the number of workers or the amount of payroll covered by the insurance policy.

4. Pursuant to the scheme to defraud described below, the defendant, through Gedeon, facilitated the employment in the construction industry of undocumented aliens living and working illegally in the United States. Construction contractors and subcontractors entered into an agreement with Gedeon by which Gedeon provided workers, most of whom were undocumented aliens, for the contractors and subcontractors. By obtaining and paying the workers through Gedeon, which was a shell company, the contractors and subcontractors could disclaim responsibility for ensuring (1) that the workers were legally authorized to work in the United States, (2) that required state and federal payroll taxes were paid, and (3) that adequate workers' compensation insurance was provided.

B. Scheme and Artifice

From in or about November, 2016, through in or about November, 2017, in the Middle District of Florida, and elsewhere, the defendant,

OSCAR ARNELSON RODRIGUEZ-CRUZ,

did knowingly devise and intend to devise, and participate in and aid and abet, a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, both oral and written, that is, a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent representations concerning workers' compensation insurance, as more fully described herein.

C. Manner and Means

The manner and means by which the defendant carried out the scheme and artifice to defraud included, but were not limited to, the following:

1. On or about November 28, 2016, the defendant, on behalf of Gedeon, caused to be submitted, by electronic mail ("e-mail") in interstate commerce, a Florida Workers Compensation Application to NorGUARD Insurance Company ("NorGUARD") through Select Insurance Group, an insurance agency located in Orlando, Florida. The application falsely represented that the workers' compensation insurance would cover five employees and an estimated annual payroll of \$121,000.

2. The submission of the workers' compensation insurance application caused NorGUARD to issue a workers' compensation insurance policy to Gedeon covering the period from November 29, 2016, through November 29, 2017. The annual premium for the policy was \$20,473.20, which was based on the information provided in the application, including the number of employees and estimated payroll to be covered.

3. Although the workers' compensation premium was based on the representation that Gedeon employed five people and had an estimated annual payroll of \$121,000, the defendant "rented" Gedeon's Certificate of Liability Insurance ("COI") to construction contractors and subcontractors located in the Middle District of Florida, including contractors and subcontractors located in Duval, Clay, St. Johns, Flagler, and Bradford Counties in the Jacksonville Division of this District.

4. On or about November 28, 2016, the defendant, on behalf of Gedeon, requested that COIs representing that Gedeon had workers' compensation insurance be sent to five contractors or subcontractors, which caused an e-mail setting forth the request to be transmitted in interstate commerce.

5. NorGUARD is a subsidiary of Berkshire Hathaway GUARD Insurance Companies ("GUARD"). GUARD maintains an on-line Policy

Service Center with servers located in Wilkes-Barre, Pennsylvania. Gedeon could directly access the GUARD Policy Service Center and request that COIs be generated and e-mailed by the GUARD system as directed by Gedeon.

6. From on or about December 1, 2016, through on or about October 3, 2017, the defendant requested, and caused to be requested, dozens of COIs through the GUARD Policy Service Center. The defendant provided the COIs, and caused them to be provided, to contractors and subcontractors. The purpose of providing the COIs to the contractors and subcontractors was to help carry out the scheme to defraud by falsely representing that Gedeon had sufficient workers' compensation insurance, as required by Florida law.

7. Although the insurance company believed it was providing coverage for the number of employees and amount of payroll reflected in the workers' compensation insurance application, the defendant's actions caused the insurance company to in fact provide coverage for hundreds of workers and millions of dollars in payroll. If the insurance company had known the number of employees and amount of payroll it was in fact covering, it would have charged a premium in excess of \$2,500,000.

8. The contractors and subcontractors wrote payroll checks to Gedeon for work performed during discrete pay periods. The defendant cashed the

payroll checks, and caused them to be cashed, at check cashing services and a federally insured financial institution.

9. During the period of the scheme, the defendant cashed and caused to be cashed payroll checks totaling approximately \$15,670,438. The defendant kept approximately 4% of the cash, a total of approximately \$626,817, as a fee.

10. After cashing the payroll checks, the defendant distributed the cash remaining after deduction of the fee, and caused it to be distributed, to construction crew leaders, who paid the workers in cash. Many of the workers were undocumented aliens living and working in the United States illegally.

11. Neither Gedeon nor the contractors and subcontractors deducted state or federal payroll taxes, such as for Medicare and Social Security, from the workers' pay, in violation of Florida and federal law.

12. Neither Gedeon nor the contractors and subcontractors provided adequate workers' compensation insurance for the workers, in violation of Florida law.

13. The contractors and subcontractors writing payroll checks to Gedeon and the defendant's cashing those checks and distributing the cash to the workers resulted in the concealment of the employment of undocumented aliens working illegally in the United States.

D. Execution of the Scheme

On or about November 28, 2016, in the Middle District of Florida, and elsewhere, the defendant,

OSCAR ARNELSON RODRIGUEZ-CRUZ,

for the purpose of executing and attempting to execute, and aiding and abetting the execution of, the scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, did knowingly and with intent to defraud transmit, cause to be transmitted, and aid and abet the transmission of, in interstate commerce, by means of a wire communication, certain signs, signals, and sounds, that is, an e-mail, with an attached application for workers' compensation insurance.

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNTS TWO THROUGH ONE HUNDRED TWENTY-ONE

A. Introduction

Part A of Count One of this Indictment is realleged and incorporated herein.

B. Scheme and Artifice

Part B of Count One of this Indictment is realleged and incorporated herein.

C. Manner and Means

Part C of Count One of this Indictment is realleged and incorporated herein.

D. Execution of the Scheme

On or about the dates listed below, in the Middle District of Florida, and elsewhere, the defendant,

OSCAR ARNELSON RODRIGUEZ-CRUZ,

for the purpose of executing and attempting to execute, and aiding and abetting the execution of, the scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, did knowingly and with intent to defraud transmit, cause to be transmitted, and aid and abet the transmission of, in interstate commerce, by means of a wire communication, certain signs, signals, and sounds, that is, electronic transmission of a request to the Berkshire Hathaway GUARD Insurance Companies for a Certificate of Liability Insurance for a contractor or subcontractor, as set forth below:

COUNT	DATE	CONTRACTOR'S OR SUBCONTRACTOR'S INITIALS AND LOCATION
TWO	November 29, 2016	H.C.C. Land O' Lakes, Pasco County
		T.C.S. Brandon, Hillsborough County
		C.I. Orange Park, Clay County
		B.T.D.I. Jacksonville, Duval County
		C.C.F.D.I. Ponte Vedra, St. Johns County
THREE	November 30, 2016	C.C.T.S. Orlando, Orange County
FOUR	November 30, 2016	A.C.I. Altamonte Springs, Seminole County
FIVE	December 1, 2016	C.C.T.S. Orlando, Orange County
SIX	December 1, 2016	A.B.S. Orlando, Orange County
SEVEN	December 1, 2016	G.C.I. Winter Garden, Orange County
EIGHT	December 1, 2016	O.C.L. Orlando, Orange County
NINE	December 1, 2016	D.H.I. Oviedo, Seminole County
TEN	December 2, 2016	C.M.S. Winter Garden, Orange County
ELEVEN	December 2, 2016	A.C.I. Altamonte Springs, Seminole County

COUNT	DATE	CONTRACTOR'S OR SUBCONTRACTOR'S INITIALS AND LOCATION
TWELVE	December 5, 2016	C.D.C. Clermont, Lake County
THIRTEEN	December 5, 2016	A.E.S.I. Dover, Hillsborough County
FOURTEEN	December 5, 2016	A.D.C. Jacksonville, Duval County
FIFTEEN	December 5, 2016	A.C.I. St. Augustine, St. Johns County
SIXTEEN	December 5, 2016	C.I. Orange Park, Clay County
SEVENTEEN	December 5, 2016	P.P.I. St. Johns, St. Johns County
EIGHTEEN	December 7, 2016	R.B.S.I. Riverview, Hillsborough County
NINETEEN	December 7, 2016	A.C.I. St. Augustine, St. Johns County
TWENTY	December 8, 2016	V.I. Oviedo, Seminole County
TWENTY-ONE	December 8, 2016	R.P.J. Orange Park, Clay County
TWENTY-TWO	December 8, 2016	A.I.I.R.L. Orlando, Orange County
TWENTY-THREE	December 8, 2016	K.B. Plant City, Hillsborough County
TWENTY-FOUR	December 9, 2016	P.D. Holiday, Pasco County
TWENTY-FIVE	December 9, 2016	R.A.B.I. Jacksonville, Duval County
TWENTY-SIX	December 13, 2016	G.E. Orlando, Orange County

COUNT	DATE	CONTRACTOR'S OR SUBCONTRACTOR'S INITIALS AND LOCATION
TWENTY-SEVEN	December 13, 2016	R.E.A.C.D. St. Augustine, St. Johns County
TWENTY-EIGHT	December 13, 2016	S.E.F.L. Jacksonville, Duval County
TWENTY-NINE	December 15, 2016	L.F.I. Orlando, Orange County
THIRTY	December 15, 2016	D.C. Valrico, Hillsborough County
THIRTY-ONE	December 15, 2016	G.B.P. Inc. Kissimmee, Osceola County
THIRTY-TWO	December 15, 2016	D.C.I. Wesley Chapel, Pasco County
THIRTY-THREE	December 16, 2016	E.D. Palm Coast, Flagler County
THIRTY-FOUR	December 16, 2016	G.C.L Winter Garden, Orange County
THIRTY-FIVE	December 20, 2016	B.C.B.I. Jacksonville, Duval County
THIRTY-SIX	December 21, 2016	E.D.J.P.L. Jacksonville, Duval County
THIRTY-SEVEN	December 21, 2016	A.P. St. Cloud, Osceola County
THIRTY-EIGHT	December 22, 2016	B.P.S. Orlando, Orange County
THIRTY-NINE	December 22, 2016	O.C.L. Orlando, Orange County
FORTY	December 28, 2016	B.P.C. Orlando, Orange County
FORTY-ONE	December 29, 2016	O.C.S. Zellwood, Orange County

COUNT	DATE	CONTRACTOR'S OR SUBCONTRACTOR'S INITIALS AND LOCATION
FORTY-TWO	December 30, 2016	P.C.F.G. Middleburg, Clay County
FORTY-THREE	January 4, 2017	E.F.P.C. Ocala, Marion County
FORTY-FOUR	January 4, 2017	A.T.C. Apopka, Orange County
FORTY-FIVE	January 4, 2017	B.C.B.C.I. Jacksonville, Duval County
FORTY-SIX	January 5, 2017	I.T.I. Wesley Chapel, Pasco County
FORTY-SEVEN	January 9, 2017	A.G.C. Jacksonville, Duval County
FORTY-EIGHT	January 9, 2017	S.P.I. Clermont, Lake County
FORTY-NINE	January 10, 2017	I.G.P.S.I. Jacksonville, Duval County
FIFTY	January 10, 2017	P.S.C.C. Jacksonville, Duval County
FIFTY-ONE	January 10, 2017	F.U.L. Lawtey, Bradford County
FIFTY-TWO	January 10, 2017	R.A.B.I. Jacksonville, Duval County
FIFTY-THREE	January 11, 2017	A.P.I. Jacksonville, Duval County
FIFTY-FOUR	January 11, 2017	F.N.S.C.L. Jacksonville, Duval County
FIFTY-FIVE	January 12, 2017	C.S.I. Kissimmee, Osceola County
FIFTY-SIX	January 13, 2017	B.P.I. Middleburg, Clay County

COUNT	DATE	CONTRACTOR'S OR SUBCONTRACTOR'S INITIALS AND LOCATION
FIFTY-SEVEN	January 17, 2017	H.C.C. Land O' Lakes, Pasco County
FIFTY-EIGHT	January 17, 2017	I.H.C.I Auburndale, Polk County
FIFTY-NINE	January 19, 2017	J.C.L. Orlando, Orange County
SIXTY	January 24, 2017	S.S.S.I. Orlando, Orange County
SIXTY-ONE	January 24, 2017	G.D. Jacksonville, Duval County
SIXTY-TWO	January 25, 2017	K.P.C.I. St. Augustine, St. Johns County
SIXTY-THREE	January 27, 2017	C.C.C. Orlando, Orange County
SIXTY-FOUR	January 31, 2017	J.L.J.W.S.L. Altamonte Springs, Seminole County
SIXTY-FIVE	January 31, 2017	D.B.L.D.I. Fleming Island, Clay County
SIXTY-SIX	January 31, 2017	F.F.T.I. Weeki Wachee, Hernando County
SIXTY-SEVEN	January 31, 2017	I.C. South Pasadena, Pinellas County
SIXTY-EIGHT	January 31, 2017	T.R.G. Plant City, Hillsborough County
SIXTY-NINE	January 31, 2017	C.C.C. Orlando, Orange County
SEVENTY	January 31, 2017	T.S.D.C. Eustis, Lake County
SEVENTY-ONE	January 31, 2017	S.H. Lakeland, Polk County

COUNT	DATE	CONTRACTOR'S OR SUBCONTRACTOR'S INITIALS AND LOCATION
SEVENTY-TWO	February 3, 2017	E.U.I. Wildwood, Sumter
SEVENTY-THREE	February 3, 2017	A.F.I.C.I. Lakeland, Polk County
SEVENTY-FOUR	February 3, 2017	B.D.I. Green Cove Springs, Clay County
SEVENTY-FIVE	February 6, 2017	Q.C.M.L. St. Augustine, St. Johns County
SEVENTY-SIX	February 8, 2017	R.Q.S.I. Jacksonville, Duval County
SEVENTY-SEVEN	February 9, 2017	J.D.P.V.P. Jacksonville, Duval County
SEVENTY-EIGHT	February 9, 2017	T.A.C.I. Jacksonville, Duval County
SEVENTY-NINE	February 9, 2017	D.C.L. Plant City, Hillsborough County
EIGHTY	February 13, 2017	E.D. Palm Coast, Flagler County
EIGHTY-ONE	February 17, 2017	B.L.D.S.I. Kissimmee, Osceola County
EIGHTY-TWO	February 23, 2017	C.M.I. Orange Park, Clay County
EIGHTY-THREE	February 28, 2017	D.C.L. Jacksonville, Duval County
EIGHTY-FOUR	March 1, 2017	B.O.P. Jacksonville, Duval County
EIGHTY-FIVE	March 1, 2017	B.P.C.I. Middleburg, Clay County
EIGHTY-SIX	March 8, 2017	L.R.A.S.L. Jacksonville, Duval County

COUNT	DATE	CONTRACTOR'S OR SUBCONTRACTOR'S INITIALS AND LOCATION
EIGHTY-SEVEN	March 13, 2017	A.C.I. St. Augustine, St. Johns
EIGHTY-EIGHT	March 27, 2017	S.P.I. Clermont, Lake County
EIGHTY-NINE	March 28, 2017	A.F.M. Dover, Hillsborough County
NINETY	March 28, 2017	J.F.L. Jacksonville, Duval County
NINETY-ONE	April 18, 2017	D.C.L. Jacksonville, Duval County
NINETY-TWO	May 2, 2017	E.C.N.F. Middleburg, Clay County
NINETY-THREE	May 2, 2017	D.A.R.F.L. Jacksonville, Duval County
NINETY-FOUR	May 2, 2017	N.F.J. Jacksonville, Duval County
NINETY-FIVE	May 2, 2017	K.C. Jacksonville, Duval County
NINETY-SIX	May 2, 2017	R.E.L. Winter Haven, Polk County
NINETY-SEVEN	May 2, 2017	S.P.S. Orange Park, Clay County
NINETY-EIGHT	May 2, 2017	B.P.I. Middleburg, Clay County
NINETY-NINE	May 2, 2017	S.C.G.I. Longwood, Seminole County
ONE HUNDRED	May 4, 2017	L.R.A.S.L. Jacksonville, Duval County
ONE HUNDRED ONE	May 16, 2017	D.R.C.S.I. Wesley Chapel, Pasco County

COUNT	DATE	CONTRACTOR'S OR SUBCONTRACTOR'S INITIALS AND LOCATION
ONE HUNDRED TWO	May 16, 2017	R.R.F.I. Jacksonville, Duval County
ONE HUNDRED THREE	May 25, 2017	C.C.I. Orlando, Orange County
ONE HUNDRED FOUR	May 25, 2017	A.P.S.C.F.I. Christmas, Orange County
ONE HUNDRED FIVE	May 26, 2017	A.R. Satellite Beach, Brevard County
ONE HUNDRED SIX	June 8, 2017	C.R.C.I. Orlando, Orange County
ONE HUNDRED SEVEN	June 8, 2017	G.C.S.I. Palm Coast, Flagler County
ONE HUNDRED EIGHT	June 8, 2017	S.N.D.L. Mulberry, Polk County
ONE HUNDRED NINE	June 26, 2017	A.G.C. Jacksonville, Duval County
ONE HUNDRED TEN	June 26, 2017	D.H.R.I. Orange Park, Clay County
ONE HUNDRED ELEVEN	June 30, 2017	M.S.L. Tampa, Hillsborough County
ONE HUNDRED TWELVE	July 7, 2017	P.C.F.G. Middleburg, Clay County
ONE HUNDRED THIRTEEN	August 22, 2017	P.D.C.L. Kissimmee, Osceola County
ONE HUNDRED FOURTEEN	August 23, 2017	I.G.P.S.I. Jacksonville, Duval County
ONE HUNDRED FIFTEEN	August 25, 2017	G.C.I. Winter Garden, Orange County
ONE HUNDRED SIXTEEN	September 19, 2017	A.B.S. Jacksonville, Duval County

COUNT	DATE	CONTRACTOR'S OR SUBCONTRACTOR'S INITIALS AND LOCATION
ONE HUNDRED SEVENTEEN	September 19, 2017	M.C.B.I. Jacksonville, Duval County
ONE HUNDRED EIGHTEEN	September 20, 2017	M.C.R.I. Jacksonville, Duval County
ONE HUNDRED NINETEEN	September 25, 2017	A.B.S. Jacksonville, Duval County
ONE HUNDRED TWENTY	September 26, 2017	S.C. Winter Garden, Orange County
ONE HUNDRED TWENTY-ONE	October 3, 2017	O.O.D.C. Sanford, Seminole County

All in violation of Title 18, United States Code, Sections 1343 and 2.

COUNT ONE HUNDRED TWENTY-TWO

A. Introduction

Part A of Count One of this Indictment is realleged and incorporated herein.

B. Charge

From in or about November, 2016, through in or about January, 2018, in the Middle District of Florida, and elsewhere, the defendant,

OSCAR ARNELSON RODRIGUEZ-CRUZ,

did knowingly and willfully conspire, combine, confederate, and agree with others to defraud the United States for the purpose of impeding, impairing, obstructing, and defeating the lawful government functions of the IRS in the ascertainment, computation, assessment, and collection of federal payroll taxes, specifically Federal Insurance Contributions Act (“FICA”) taxes (Social Security tax and Medicare tax) and federal income tax.

C. Manner and Means

Part C of Count One of this Indictment is realleged and incorporated herein.

D. Overt Acts

In furtherance of the conspiracy, and to effect the objects thereof, the following overt acts, among others, were committed in the Middle District of Florida, and elsewhere:

1. On or about November 14, 2016, the defendant registered Gedeon, and caused it to be registered, as a corporation with the Florida Department of State.
2. On or about November 28, 2016, the defendant, on behalf of Gedeon, caused to be submitted, by e-mail in interstate commerce, a Florida Workers Compensation Application to NorGUARD through Select Insurance Group, an insurance agency located in Orlando, Florida.

3. On or about November 28, 2016, the defendant, on behalf of Gedeon, requested that COIs representing that Gedeon had workers' compensation insurance be sent to five contractors or subcontractors, which caused an e-mail setting forth the request to be transmitted in interstate commerce.

4. On or about November 28, 2016, the defendant entered into an agreement with Paychex to provide payroll services for Gedeon.

5. On or about November 28, 2016, the defendant provided and caused to be provided to Paychex a notice from the IRS regarding the assignment of an Employer Identification Number ("EIN") to Gedeon.

6. On or about December 7, 2016, the defendant provided and caused to be provided to Community Choice Financial, a check cashing business, a notice from the IRS regarding the assignment of an EIN to Gedeon.

7. On or about January 24, 2017, the defendant provided and caused to be provided to a contractor with the initials G.D. an IRS Form W-9, Request for Taxpayer Identification Number and Certification, for Gedeon and a notice from the IRS regarding the assignment of an EIN to Gedeon.

8. On or about July 13, 2017, the defendant provided and caused to be provided to Citiwide Check Cashing an IRS Form W-9, Request for Taxpayer

Identification Number and Certification, for Gedeon and a notice from the IRS regarding the assignment of an EIN to Gedeon.

9. From on or about December 1, 2016, through on or about October 3, 2017, the defendant requested, and caused to be requested, dozens of COIs through the GUARD Policy Service Center.

10. During the period of the conspiracy, the defendant cashed and caused to be cashed payroll checks totaling approximately \$15,670,438.

11. On or about October 11, 2017, the defendant cashed and caused to be cashed 11 payroll checks totaling approximately \$108,743.55.

12. On or about January 23, 2017, the defendant caused to be filed with the IRS, on behalf of Gedeon, a Form 941, Employer's QUARTERLY Federal Tax Return, for the quarter ending in December, 2016, that reported that Gedeon had eight employees with total wages, tips, and other compensation of \$8,320.

13. On or about April 25, 2017, the defendant caused to be filed with the IRS, on behalf of Gedeon, a Form 941, Employer's QUARTERLY Federal Tax Return, for the quarter ending in March, 2017, that reported that Gedeon had five employees with total wages, tips, and other compensation of \$29,320.

14. On or about July 18, 2017, the defendant caused to be filed with the IRS, on behalf of Gedeon, a Form 941, Employer's QUARTERLY Federal Tax

Return, for the quarter ending in June, 2017, that reported that Gedeon had six employees with total wages, tips, and other compensation of \$29,730.

15. On or about October 19, 2017, the defendant caused to be filed with the IRS, on behalf of Gedeon, a Form 941, Employer's QUARTERLY Federal Tax Return, for the quarter ending in September, 2017, that reported that Gedeon had zero employees with total wages, tips, and other compensation of \$19,710.

16. On or about January 22, 2018, the defendant caused to be filed with the IRS, on behalf of Gedeon, a Form 941, Employer's QUARTERLY Federal Tax Return, for the quarter ending in December, 2017, that reported that Gedeon had zero employees with total wages, tips, and other compensation of \$2,400.

All in violation of Title 18, United States Code, Section 371.

FORFEITURES

1. The allegations contained in Counts One through One Hundred Twenty-One of this Indictment are incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

2. Upon conviction of a violation of 18 U.S.C. § 1343, the defendant, OSCAR ARNELSON RODRIGUEZ-CRUZ, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 18,

United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violation.

3. The property to be forfeited includes, but is not limited to, the following:

- a. the sum of at least \$626,817.00 which represents the approximate amount of proceeds the defendant obtained as a result of the offense; and
- b. the sum of \$105,461.00 in U.S. currency seized from the defendant on October 11, 2017.

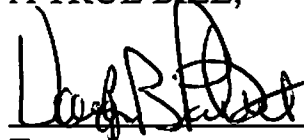
4. If any of the property described above, as a result of any act or omission of the defendant:

- 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 of America shall be entitled to forfeiture of substitute property

pursuant to Title 21, United States Code, Section 853(p), as incorporated by
Title 28, United States Code, Section 2461(c).

A TRUE BILL,



Foreperson

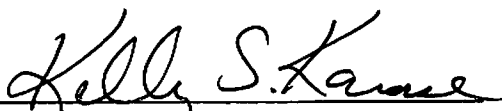
MARIA CHAPA LOPEZ
United States Attorney

By:



ARNOLD B. CORSMEIER
Assistant United States Attorney

By:



KELLY S. KARASE
Assistant United States Attorney
Deputy Chief, Jacksonville Division

No.

UNITED STATES DISTRICT COURT
Middle District of Florida
Jacksonville Division

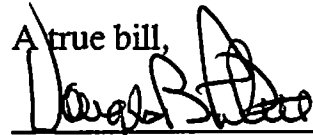
THE UNITED STATES OF AMERICA

vs.

OSCAR ARNELSON RODRIGUEZ-CRUZ

INDICTMENT


Violations: 18 U.S.C. §§ 371 & 1343

A true bill,


Foreperson

Filed in open court this 14th day

of March, 2018.



Clerk

Bail \$ _____
