

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA	:	
	:	
- v. -	:	<u>INFORMATION</u>
	:	
JORGE PADILLA,	:	19 Cr. ()
	:	
Defendant.	:	
	:	
-----	X	

COUNT ONE

(Wire Fraud)

The United States Attorney charges:

1. From at least in or about September 2014, up to and including in or about April 2017, in the Southern District of New York and elsewhere, JORGE PADILLA, willfully and knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, PADILLA, engaged in a scheme to solicit funds for financial investment in a sham financial investment company and executed such scheme through the use of interstate wires including e-mails and telephone calls.

(Title 18, United States Code, Section 1343.)

FORFEITURE ALLEGATION

2. As a result of committing the offense alleged in Count One of this Information, JORGE PADILLA, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, all property, real and personal, which constitutes and is derived from proceeds traceable to the offense alleged in Count One, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.


SUBSTITUTE ASSETS

3. If any of the above-described forfeitable property, as a result of any act or omission of JORGE PADILLA, the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- 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 intention of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



GEOFFREY S. BERMAN, *Im*
United States Attorney

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(18 U.S.C. § 1343.)

GEOFFREY S. BERMAN
United States Attorney.
