

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA : INFORMATION  
: :  
- v. - : 20 Cr. 495 (VB)  
: :  
GUSTAVO L. VILA, :  
: :  
Defendant. :  
----- X

COUNT ONE  
(Theft of Government Funds)

The Acting United States Attorney charges:

1. From at least in or about October 2016, up to and including in or about 2019, in the Southern District of New York and elsewhere, GUSTAVO L. VILA, the defendant, did embezzle, steal, purloin, and knowingly convert to his use and the use of another, and without authority, did sell, convey, and dispose of records, vouchers, money, and things of value of the United States and a department and agency thereof, to wit, the Department of Justice, which exceeded the sum of \$1,000, and did receive, conceal, and retain the same with intent to convert it to his use and gain, knowing it to have been embezzled, stolen, purloined and converted, to wit, VILA used for his own benefit payments from the September 11th Victim Compensation Fund that did not belong to him.

(Title 18, United States Code, Sections 641 and 2.)

**FORFEITURE ALLEGATION**

2. As a result of committing the offense alleged in Count One of this Information, GUSTAVO L. VILA, 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(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, 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 Provision**

3. If any of the above-described forfeitable property, 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;

it is the intent 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 981; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)



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AUDREY STRAUSS  
Acting United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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INFORMATION

20 Cr.

(18 U.S.C. §§ 641 and 2.)

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