

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 18-80078-CR-Middlebrooks/Brannon

18 U.S.C. § 1956(h)
18 U.S.C. § 1956(a)(1)(B)(i)
18 U.S.C. § 1028(a)(7)
18 U.S.C. § 922(g)(1)
18 U.S.C. § 2

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SCOTT LEVENBERG
and
BRADLEY R. WRIGHT,

Defendants.



INDICTMENT

The Grand Jury charges that:

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

From in or about September 2016, through in or about March 2018, the exact dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

SCOTT LEVENBERG
and
BRADLEY R. WRIGHT,

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 other persons known and unknown to the Grand Jury, to conduct financial transactions affecting interstate and foreign commerce, which financial transactions involved the proceeds of specified unlawful activity, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, and knowing that the financial transactions were designed in whole and in part, 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).

It is further alleged that the specified unlawful activity is wire fraud, in violation of Title 18, United States Code, Section 1343.

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

COUNTS 2-7
Money Laundering
(18 U.S.C. §§ 1956(a)(1)(B)(i) and 2)

On or about the dates set forth below, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants, as set forth below, did knowingly conduct and attempt to conduct, and aid and abet, the following financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, and knowing that the financial transactions were designed, in whole and in part, to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, as set forth below:

Count	Approximate Date of Deposit	Financial Transaction	Defendant
2	September 19, 2016	A withdrawal from F.O.'s Bank of America account of approximately \$500	SCOTT LEVENBERG
3	September 20, 2016	A withdrawal from R.W.'s Bank of America account of approximately \$5,000	SCOTT LEVENBERG
4	September 20, 2016	A withdrawal from R.W.'s Bank of America account of approximately \$4,000	SCOTT LEVENBERG
5	January 26, 2017	A withdrawal from G.K.'s Bank of America account of approximately \$8,190	SCOTT LEVENBERG
6	June 29, 2017	A withdrawal from S.S.'s Wells Fargo account of approximately \$4,500	SCOTT LEVENBERG
7	March 8, 2018	A withdrawal from an undercover Wells Fargo Account of approximately \$8,400	SCOTT LEVENBERG; BRADLEY WRIGHT

It is further alleged that the specified unlawful activity is wire fraud, in violation of Title 18, United States Code, Section 1343.

In violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNT 8
Identity Theft
(18 U.S.C. §§ 1028(a)(7) and 2)

On or about March 8, 2018, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

SCOTT LEVENBERG
and
BRADLEY R. WRIGHT,

did knowingly transfer and possess, without lawful authority, and in and affecting interstate commerce, a means of identification of another person, that is, a driver's license issued to S.S.,

with the intent to commit, and to aid and abet, and in connection with, any unlawful activity that constitutes a violation of Federal law, that is, Title 18, United States Code, Section 1956(a)(1)(B)(i), as charged in Count 7 herein, in violation of Title 18, United States Code, Sections 1028(a)(7) and 2.

COUNT 9
Felon in Possession of Ammunition
(18 U.S.C. §922(g)(1))

On or about March 16, 2018, in Palm Beach County, in the Southern District of Florida,
the defendant,

SCOTT LEVENBERG,

having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess one or more rounds of ammunition, in and affecting interstate and foreign commerce, that is, approximately two (2) rounds of 9 mm Luger “FC” ammunition.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

FORFEITURE ALLEGATIONS

The allegations contained in this Indictment are re-alleged and incorporated by reference as though fully set forth herein for the purpose of alleging criminal forfeiture to the United States of America of certain property in which the defendants have an interest.


Upon conviction of any violation of Title 18, United States Code, Section 1956, as alleged in this Indictment, any defendant so convicted shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in such offense, and any property traceable to such property.

If any of the property described above, as a result of any act or omission 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 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 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:


FOREPERSON


BENJAMIN G. GREENBERG
UNITED STATES ATTORNEY


AURORA FAGAN
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES OF AMERICA

CASE NO. 18-80078-CR-Middlebrooks/Brannon

vs.

**SCOTT LEVENBERG and
BRADLEY R. WRIGHT,**

CERTIFICATE OF TRIAL ATTORNEY*

Defendants.

Superseding Case Information:

Court Division: (Select One)

Miami Key West
FTL WPB

New Defendant(s) Yes No
Number of New Defendants _____
Total number of counts _____
FTP

I do hereby certify that:

- I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
- I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.
- Interpreter: (Yes or No) No
List language and/or dialect _____
- This case will take 7 days for the parties to try.
- Please check appropriate category and type of offense listed below:

(Check only one)	(Check only one)
I 0 to 5 days _____	Petty _____
II 6 to 10 days <u>X</u>	Minor _____
III 11 to 20 days _____	Misdem. _____
IV 21 to 60 days _____	Felony <u>X</u>
V 61 days and over _____	

6. Has this case been previously filed in this District Court? (Yes or No) No
 If yes: Judge: Case No. _____
 (Attach copy of dispositive order)
 Has a complaint been filed in this matter? (Yes or No) Yes
 If yes: Magistrate Case No. 18-8108-DLB
 Related Miscellaneous numbers: _____
 Defendant(s) in federal custody as of _____
 Defendant(s) in state custody as of _____
 Rule 20 from the District of _____

Is this a potential death penalty case? (Yes or No) Yes No

- Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to October 14, 2003? Yes No
- Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to September 1, 2007? Yes No



 AURORA FAGAN
 ASSISTANT UNITED STATES ATTORNEY
 Florida Bar No. 188591

*Penalty Sheet(s) attached

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: SCOTT LEVENBERG

Case No: 18-80078-CR-Middlebrooks/Brannon

Count 1:

Money Laundering Conspiracy.

Title 18, United States Code, Section 1956(h)

*** Max. Penalty:** 20 years' imprisonment, 3 years' supervised release, and a fine of \$500,000 or twice the value of the property involved in the transaction, whichever is greater.

Counts 2-7:

Money Laundering.

Title 18, United States Code, Section 1956(a)(1)(B)(i)

*** Max. Penalty:** 20 years' imprisonment, 3 years' supervised release, and a fine of \$500,000 or twice the value of the property involved in the transaction, whichever is greater.

Count 8:

Identity Theft.

Title 18, United States Code, Sections 1028(a)(7) and (b)((1)(D)

*** Max. Penalty:** 15 years' imprisonment, \$250,000 fine, and 3 years' supervised release.

Count 9:

Felon in Possession of Ammunition

Title 18, United States Code, Sections 922(g)(1) and 924(a)(2)

* **Max. Penalty:** 10 years' imprisonment, \$250,000 fine and 3 years' supervised release.

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: BRADLEY WRIGHT

Case No: 18-80078-CR-Middlebrooks/Brannon

Count 1:

Money Laundering Conspiracy.

Title 18, United States Code, Section 1956(h)

*** Max. Penalty:** 20 years' imprisonment, 3 years' supervised release, and a fine of \$500,000 or twice the value of the property involved in the transaction, whichever is greater.

Counts 7:

Money Laundering.

Title 18, United States Code, Section 1956(a)(1)(B)(i)

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Defendants.

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Miami Key West
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SOUTHERN DISTRICT OF FLORIDA

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Title 18, United States Code, Sections 1028(a)(7) and (b)((1)(D)

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Count 9:

Felon in Possession of Ammunition

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* **Max. Penalty:** 10 years' imprisonment, \$250,000 fine and 3 years' supervised release.

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: BRADLEY WRIGHT

Case No: 18-80078-CR-Middlebrooks/Brannon

Count 1:

Money Laundering Conspiracy.

Title 18, United States Code, Section 1956(h)

*** Max. Penalty:** 20 years' imprisonment, 3 years' supervised release, and a fine of \$500,000 or twice the value of the property involved in the transaction, whichever is greater.

Counts 7:

Money Laundering.

Title 18, United States Code, Section 1956(a)(1)(B)(i)

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Title 18, United States Code, Sections 1028(a)(7) and (b)(1)(D)

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