

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

2018 OCT 26 PM 4:13
U.S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA, FLORIDA

UNITED STATES OF AMERICA

v.

CASE NO. 8:18 cr 502 T 33 SP F
18 U.S.C. § 1956(h)

ALEJANDRO JUAREZ

INFORMATION

The United States Attorney charges:

COUNT ONE
(Money Laundering Conspiracy)

Introduction

At times relevant to this Information:

1. Defendant ALEJANDRO JUAREZ was a resident of the Middle District of Florida.

The Conspiracy

2. Beginning on an unknown date, but no later than in or around July 2015, and continuing through at least in or around September 2015, in the Middle District of Florida and elsewhere, the defendant,

ALEJANDRO JUAREZ,

did knowingly combine, conspire, confederate, and agree with others, both known and unknown to the United States Attorney, to commit offenses against the United States, to wit:

a. knowing that the property involved in a financial transaction represented the proceeds of some form of unlawful activity, did conduct, and attempt to conduct, a financial transaction, which in fact involved the proceeds of specified unlawful activity, that is, wire fraud, in violation of 18 U.S.C. § 1343, with the intent to promote the carrying on of specified unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(A)(i); and

b. knowing that the property involved in a financial transaction represented the proceeds of some form of unlawful activity, did conduct, and attempt to conduct, a financial transaction which, in fact involved the proceeds of specified unlawful activity, that is, wire fraud, in violation of 18 U.S.C. § 1343, knowing that the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(B)(i).

Manner and Means of the Conspiracy

3. The manner and means by which the conspirators sought to accomplish the objects of the conspiracy included, among others, the following:

a. It was part of the conspiracy that conspirators would and did contact victims, via telephone, and induce fear and extort money from said victims by falsely and fraudulently representing that the victims owed federal income tax to the Internal Revenue Service (IRS), or other financial obligations, and would and did threaten that, if the victims failed to pay these obligations, they or their family members would face arrest, prosecution, or other legal consequences;

b. It was further a part of the conspiracy that conspirators would and did direct and instruct victims to transmit money to the defendant and/or other United States (U.S.)-based conspirators using one or more wire transmitter services, often to conceal from law enforcement officers the identities of the victims as well as the nature and sources of the financial transactions;

c. It was further a part of the conspiracy that the defendant and other U.S.-based conspirators would and did pick up from the money transmitter services the fraudulently-obtained funds wired by the victims and

then 1) provide cash to other U.S.-based conspirators, or 2) deposit the funds into U.S. bank accounts as directed by conspirators;

d. It was further a part of the conspiracy that conspirators would and did share in the proceeds of the fraud scheme, usually receiving percentages commensurate with their respective roles, to promote and perpetuate the scheme; and

e. It was further a part of the conspiracy that conspirators would and did engage in multiple meetings, perform acts, and make statements to promote and achieve the objects of the conspiracy and to misrepresent, hide, and conceal, and cause to be misrepresented, hidden, and concealed, the purpose of the conspiracy and the acts committed in furtherance thereof.

In violation of 18 U.S.C. § 1956(h).

FORFEITURE

1. The allegations contained in Count One of this Information are incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 982(a)(1).

2. Upon conviction of a violation of 18 U.S.C. § 1956(h) the defendant,

ALEJANDRO JUAREZ,

shall forfeit to the United States of America, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in such offense and any property traceable to such property.

3. The property subject to forfeiture includes, but is not limited to, the sum of at least \$143,383.51 in United States currency, which represents the amount involved in the offense.

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 under the provisions of 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1).

MARIA CHAPA LOPEZ
United States Attorney

By: 

Rachel K. Jones
Assistant United States Attorney

By: 

Jay G. Trezevant
Assistant United States Attorney
Chief, Economic Crimes Section