

Apr 23, 2020
ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S.D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
20-20169-CR-WILLIAMS/TORRES

Case No. _____
18 U.S.C. § 1956(h)
18 U.S.C. § 982

UNITED STATES OF AMERICA

vs.

JOSE VICENTE GOMEZ AVILES,

Defendant.

_____ /

INFORMATION

The United States charges that:

CONSPIRACY TO COMMIT MONEY LAUNDERING
(18 U.S.C. § 1956)

Beginning in or around 2014, through in or around at least 2017, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

JOSE VICENTE GOMEZ AVILES,

did knowingly and willfully combine, conspire, confederate, and agree with others known and unknown, to violate Title 18, United States Code, Section 1956, that is, to knowingly conduct a financial transaction affecting interstate or foreign commerce, which transaction involved the proceeds of specified unlawful activity, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, and knowing that such transaction was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership and the 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 activities are: (i) violations of the Foreign

Corrupt Practices Act (“FCPA”), in violation of Title 15, United States Code, Section 78dd-2; and (ii) offenses against a foreign nation involving bribery of a public official in violation of foreign law, specifically the Ecuadorian Penal Code, pursuant to Title 18, United States Code, Section 1956(c)(7)(B)(iv).

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

FORFEITURE
(18 U.S.C. § 982)

1. The allegations contained in this Information are re-alleged and incorporated by reference as though fully set forth herein for the purpose of alleging forfeiture to the United States of certain property in which the defendant, **JOSE VICENTE GOMEZ AVILES**, has an interest.

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

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;

the United States shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO. _____

v.

CERTIFICATE OF TRIAL ATTORNEY*

JOSE VICENTE GOMEZ AVILES,

Superseding Case Information:

_____ Defendant. /

Court Division: (Select One)

Miami Key West
 FTL WPB FTP

New defendant(s) Yes No
Number of new defendants _____
Total number of counts _____

- 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) Yes
List language and/or dialect Spanish
- This case will take 5 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
 II 6 to 10 days _____
 III 11 to 20 days _____
 IV 21 to 60 days _____
 V 61 days and over _____

Petty _____
 Minor _____
 Misdem. _____
 Felony

6. Has this case previously been 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.

1:20-mj-02228

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) No

7. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to August 9, 2013 (Mag. Judge Alicia O. Valle)? Yes No

8. Does this case originate from a matter pending in the Northern Region U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)? Yes No

Alexander Kramer

Trial Attorney

Court ID A5502240

*Penalty Sheet(s) attached

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: JOSE VICENTE GOMEZ AVILES

Case No: _____

Count #: 1

Conspiracy to Commit Money Laundering _____

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

***Max. Penalty:** Twenty (20) Years' Imprisonment

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

FILED by JA D.C.
Apr 23, 2020
ANGELA E. NOBLE
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_____ /

NOTICE OF FILING INFORMATION

The United States, by and through the undersigned, hereby agrees to file this Information via email due to the COVID-19 circumstances.

Respectfully submitted,

ROBERT ZINK
CRIMINAL DIVISION, FRAUD SECTION
U.S. DEPARTMENT OF JUSTICE

BY: s/ Alexander Kramer

Alexander Kramer
Katherine Raut
La’Nese Clarke
Trial Attorneys
United States Department of Justice
Criminal Division, Fraud Section
1400 New York Avenue, N.W.
Washington, D.C. 20005
Telephone: (202) 307-0955

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 23, 2020, I filed this notice via email with the Clerk of the Court.

*/s/ Alexander Kramer*_____