

**Jun 16, 2020**

ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S.D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
**20-20175-CR-MARTINEZ/OTAZO-REYES**  
Case No. \_\_\_\_\_

18 U.S.C. § 1956(h)

18 U.S.C. § 982

UNITED STATES OF AMERICA

vs.

FELIPE MONCALEANO BOTERO,

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,

**FELIPE MONCALEANO BOTERO,**

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, **FELIPE MONCALEANO BOTERO**, 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

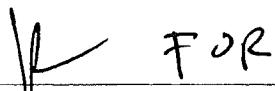
difficulty;

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

982(b)(1).

All pursuant to Title 18, United States Code, Section 982(a)(1) and the procedures set forth in Title 21, United States Code, Section 853, as incorporated by Title 18, United States Code, Section 982(b)(1).

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

By:  FOR  
\_\_\_\_\_  
KATHERINE RAUT, TRIAL ATTORNEY  
ALEXANDER KRAMER, TRIAL ATTORNEY  
LA'NESE CLARKE, TRIAL ATTORNEY  
CRIMINAL DIVISION, FRAUD SECTION