

FILED by **KS** D.C.  
  
**Sep 7, 2021**  
  
ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S.D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
**21-60258-CR-SMITH/VALLE**  
CASE NO. \_\_\_\_\_

18 U.S.C. § 1956(h)  
18 U.S.C. § 1957  
18 U.S.C. § 982(a)(1)

UNITED STATES OF AMERICA,

v.

LUIS BERKMAN,

Defendant.

\_\_\_\_\_ /

**INFORMATION**

The United States charges that:

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

Beginning in or around October 2019, and continuing through in or around at least January 2021, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

**LUIS BERKMAN,**

did knowingly and voluntarily combine, conspire, confederate, and agree with Bryan Samuel Berkman, Philip Lichtenfeld, Arturo Carlos Murillo Prijic, Sergio Rodrigo Mendez Mendizabal, and other persons, known and unknown to the United States, to violate Title 18, United States Code, Section 1957, that is, to knowingly engage and attempt to engage in a monetary transaction by, through, and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from specified unlawful activity, in violation of Title 18, United States Code, Section 1957.

It is further alleged that the specified unlawful activity is a felony violation of the Foreign Corrupt Practices Act, Title 15, United States Code, Section 78dd-2.

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

**FORFEITURE ALLEGATIONS**  
**(18 U.S.C. § 982(a)(1))**

1. The allegations of this Information are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendant, **LUIS BERKMAN**, has an interest.

2. Upon conviction of a conspiracy to violate Title 18, United States Code, Section 1957, as alleged in this Information, the defendant shall forfeit to the United States any property, real or personal, involved in such offense, and any property traceable to such property, pursuant to Title 18, United States Code, Section 982(a)(1).

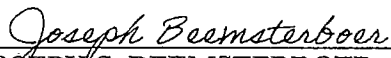
3. The property subject to forfeiture as a result of the alleged offense includes, but is not limited to, the following: a sum of approximately \$875,000 in U.S. currency, which sum represents the funds involved in the conspiracy and obtained by defendant.


4. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

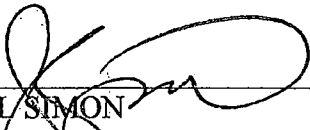
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p), which substitute property includes but is not limited to, the following: (i) real property located at 5298 Vernon Lake Drive, Dunwoody, Georgia; and (ii) real property located at 9 NE 20th Avenue, Apt. 503, Deerfield Beach, Florida 33441.

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).

  
\_\_\_\_\_  
JOSEPH S. BEEMSTERBOER  
ACTING CHIEF, FRAUD SECTION  
CRIMINAL DIVISION  
U.S. DEPARTMENT OF JUSTICE

  
\_\_\_\_\_  
JUAN ANTONIO GONZALEZ  
ACTING UNITED STATES ATTORNEY

BY:   
\_\_\_\_\_  
JIL SIMON  
TRIAL ATTORNEY  
GERALD M. MOODY, JR.  
ASSISTANT CHIEF

BY:   
\_\_\_\_\_  
ELI S. RUBIN  
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO. \_\_\_\_\_

v.

LUIS BERKMAN,

**CERTIFICATE OF TRIAL ATTORNEY\***

**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 \_\_\_\_\_

1. 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.
2. 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.

3. Interpreter: (Yes or No) **No** \_\_\_\_\_

List language and/or dialect \_\_\_\_\_

4. This case will take 0 days for the parties to try.

5. Please check appropriate category and type of offense listed below:

- |   |  |
|---|--|
| (Check only one)                                  | (Check only one)                           |
| I 0 to 5 days <input checked="" type="checkbox"/> | Petty <input type="checkbox"/>             |
| II 6 to 10 days <input type="checkbox"/>          | Minor <input type="checkbox"/>             |
| III 11 to 20 days <input type="checkbox"/>        | Misdemeanor <input type="checkbox"/>       |
| IV 21 to 60 days <input type="checkbox"/>         | Felony <input checked="" type="checkbox"/> |
| V 61 days and over <input type="checkbox"/>       |  |

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. 21-06320-MJ-AOV

Related miscellaneous numbers: N/A

Defendant(s) in federal custody as of MAY 21, 2021

Defendant(s) in state custody as of N/A

Rule 20 from the District of N/A

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 or No) **No** \_\_\_\_\_

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

9. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss)? (Yes or No) **No** \_\_\_\_\_

Eli S. Rubin

Assistant United States Attorney

Court ID No. A5502535

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** LUIS BERKMAN

**Case No:** \_\_\_\_\_

Count #: 1

Conspiracy to Commit Money Laundering

18 U.S.C. §§ 1956(h), 1957

**\*Max. Penalty:** 10 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.**