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U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
EAST DIV. COLUMBUS

**UNITED STATES OF AMERICA
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

FRANTZ FLORVILLE,

Defendant.

**CASE NO. _____
JUDGE**

2 : 18 cr 080

INFORMATION

Judge Sargus

**18 U.S.C. § 2314
FORFEITURE ALLEGATION**

THE UNITED STATES CHARGES:

COUNT 1

(18 U.S.C. § 2314: Transportation of Stolen Money)

At all times material to this Information, unless otherwise noted:

Background

1. From in or about April 2007 through on or about July 17, 2016, defendant FRANTZ FLORVILLE, a citizen of the United States, worked in the Islamic Republic of Afghanistan (Afghanistan) as the Program Specialist for one United States based company (referred to here as Prime Contractor A) and then a second United States based company (Prime Contractor B). In Afghanistan, FLORVILLE lived and primarily worked at a secure facility (Secure Facility) near the Kabul Airport. Upon leaving Afghanistan, FLORVILLE traveled to the Philippines where he lived with his wife. His last known residence in the United States was in Columbus, Ohio.

2. On or about October 15, 2015, the United States Department of Defense awarded a \$7,982,346 contract to Prime Contractor A to provide training, operation and maintenance for the Afghanistan Ministry of the Interior Ultra-High Frequency (UHF) radio communications system in Kabul, Afghanistan (Defense contract #1). Prime Contractor A also performed similar services

under a prior U.S. Department of Defense contract (Defense contract #2). In or about November 2015, Prime Contractor B acquired the assets of Prime Contractor A, including the rights and obligations under the Defense contracts.

3. The Project Manager for Prime Contractor A and then Prime Contractor B on the Defense contracts was Nebraska McAlpine (McAlpine). In Afghanistan, McAlpine also lived and primarily worked at the Secure Facility.

4. Person X, an Afghanistan citizen, owned or was involved with certain Afghanistan companies (Subcontractors A and B) that acquired or sought to acquire subcontracts under the Defense contracts from Prime Contractor A, with the assistance of McAlpine.

5. In or about the spring of 2016, FLORVILLE became suspicious that McAlpine was taking kickbacks from Person X in return for his assistance in Person X's companies seeking and acquiring subcontracts under the Defense contracts. As a result, FLORVILLE took steps to record meetings between Person X and McAlpine in or about May, June and July 2016 when those two met alone in McAlpine's office at the Secure Facility. Those recordings confirmed for FLORVILLE that McAlpine was taking kickbacks from Person X.

6. After the last recorded meeting and the departure of McAlpine and Person X from McAlpine's office, FLORVILLE went into McAlpine's office, found a bag with \$108,000 in U.S. currency in it, and, without McAlpine's permission, took it. FLORVILLE took the bag back to his own office and hid it. Later that day, FLORVILLE took the money and hid it in his residential unit at the Secure Facility.

7. On or about July 16, 2016, FLORVILLE used \$25,000 from the \$108,000 stolen money to purchase nine diamonds from a jewelry shop at the Secure Facility.

8. On or about July 16, 2016, FLORVILLE used approximately \$4,000 from the stolen money to send by Federal Express all his assigned military gear back to the CONUS Replacement

Center at Fort Hood, Texas, as well as sending his personal items to the Philippines, where he planned to live when he left Afghanistan.

Offense Conduct

9. On or about July 17, 2016, FLORVILLE flew from Afghanistan to Dubai, United Arab Emirates. For that flight, FLORVILLE hid about \$79,000 from the stolen money in boots that he purchased and altered for that purpose. In Dubai, before boarding a flight to the Philippines on or about July 18, 2016, FLORVILLE transferred the money into his backpack for the second flight. He also took the diamonds with him on these flights.

10. In or about the summer and fall of 2016, FLORVILLE and his wife used the cash and diamonds that he had brought from Afghanistan for their personal purposes.

11. On or about July 17 and 18, 2016, in the Southern District of Ohio and elsewhere, defendant FLORVILLE did knowingly transport, transmit, and transfer in foreign commerce from Afghanistan to the Philippines stolen money, that is, approximately \$79,000 in cash and \$25,000 in diamonds purchased with the stolen cash, of the value of \$5,000 or more, knowing the same to have been stolen, converted, and taken by fraud.

In violation of Title 18, United States Code, Section 2314, and pursuant to Title 18, United States Code, Section 3238.

**FORFEITURE ALLEGATION UNDER
28 U.S.C. § 2461(c) AND 18 U.S.C. § 981(a)(1)(C)**

1. The violation alleged above in Count One of this Information is realleged and incorporated by reference herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 981(a)(1)(C).

2. Upon conviction of the offense alleged in this Information, the defendant, FRANTZ FLORVILLE, shall forfeit to the United States any interest he has in property, real or personal,

constituting, or derived from, proceeds traceable to the offense of transportation of stolen money, in violation of Title 18, United States Code, Section 2314, including, but not limited to: \$104,000 in U.S. Currency, which represents the sum of money equal to the amount of proceeds derived from or traceable to the offense of transportation of stolen money, in violation of Title 18, United States Code, Section 2314.

3. If any of the property described above as being subject to forfeiture pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 981(a)(1)(C), 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 that cannot be subdivided without difficulty;

the United States shall be entitled to seek the forfeiture of substitute property, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

Criminal Forfeiture, pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 981(a)(1)(C).

**BENJAMIN C. GLASSMAN
UNITED STATES ATTORNEY**

**SANDRA L. MOSER
ACTING CHIEF, FRAUD SECTION**


**DANIEL P. BUTLER, DC #417718
Trial Attorney, Fraud Section
Criminal Division
United States Department of Justice**