

Aug 16, 2018
STEVEN M. LARIMORE
CLERK U.S. DIST. CT.
S.D. OF FLA. - MIAMI

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO.**

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

UNITED STATES OF AMERICA

v.

18-20682-CR-ALTONAGA/GOODMAN

MATTHIAS KRULL

Defendant.

_____ /

INFORMATION

The United States charges that:

COUNT 1

**Conspiracy to Commit Money Laundering
(18 U.S.C. § 1956(h))**

Beginning in or around November 2014, and continuing through in or around July 2018, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

MATTHIAS KRULL,

did knowingly and willfully combine, conspire, confederate, and agree with FRANCISCO CONVIT GURUCEAGA, JOSE VINCENTE AMPARAN CROQUER, a.k.a. "Chente," CARMELO ANTONIO URDANETA AQUI, ABRAHAM EDGARDO ORTEGA, GUSTAVO ADOLFO HERNANDEZ FRIERI, HUGO ANDREW RAMALHO GOIS, MARCELO FEDERICO GUTIERREZ ACOSTA Y LARA, and MARIO ENRIQUE BONILLA VALLERA, and other persons known and unknown to the United States, to knowingly 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, Sections 1957. All in violation of Title 18, United States Code, Section 1956(h).

It is further alleged that the specified unlawful activity is:

- (a) A felony violation of the Foreign Corrupt Practices Act, and
- (b) An offense against a foreign nation involving bribery of a public official, and the misappropriation, theft, and embezzlement of public funds by and for the benefit of a public official.

FORFEITURE ALLEGATIONS

1. The allegations of this Information are 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, **MATTHIAS KRULL**, has an interest.


2. Upon conviction of a violation of Title 18, United States Code, Section 1956(h), as alleged in this Information, the defendant shall forfeit to the United States of America 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. If any 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 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).

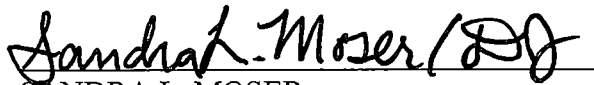
All pursuant to Title 18, United States Code, Section 982(a)(1) and the procedures set forth in Title 21, United States Code, Section 853, as incorporated by Title 18, United States Code, Section 982(b)(1).



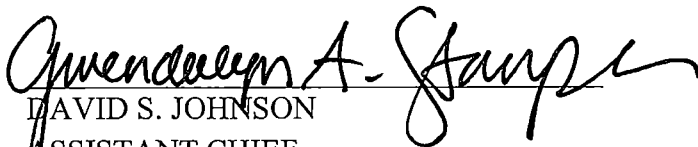
BENJAMIN G. GREENBERG
UNITED STATES ATTORNEY



FRANCISCO R. MADERAL
MICHAEL B. NADLER
ASSISTANT UNITED STATES ATTORNEYS



SANDRA L. MOSER
ACTING CHIEF, FRAUD SECTION
U.S. Department of Justice, Criminal Division



DAVID S. JOHNSON
ASSISTANT CHIEF
GWENDOLYN A. STAMPER
TRIAL ATTORNEY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO. _____

vs.

MATHIAS KRULL,

CERTIFICATE OF TRIAL ATTORNEY*

Defendant.

Superseding Case Information:

Court Division: (Select One)

X Miami Key West
 FTL WPB FTP

New Defendant(s) Yes No
Number of New Defendants
Total number of counts

I do hereby certify that:

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 <u> X </u>	Petty	<u> </u>
II	6 to 10 days <u> </u>	Minor	<u> </u>
III	11 to 20 days <u> </u>	Misdem.	<u> </u>
IV	21 to 60 days <u> </u>	Felony	<u> X </u>
V	61 days and over <u> </u>		

6. Has this case been previously 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. 18-MJ-03119-TORRES
Related Miscellaneous numbers: _____
Defendant(s) in federal custody as of July 24, 2018
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 Northern Region of the U.S. Attorney's Office prior to October 14, 2003? Yes X No

8. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to September 1, 2007? Yes X No


FRANCISCO R. MADERAL
ASSISTANT UNITED STATES ATTORNEY
Florida Bar No./Court No. 0041481

*Penalty Sheet(s) attached

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: MATTHIAS KRULL

Count #: 1

Conspiracy to Commit Money Laundering

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

*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.**

AO 455 (Rev. 01/09) Waiver of an Indictment

UNITED STATES DISTRICT COURT

for the
Southern District of Florida

United States of America

v.

MATTHIAS KRULL,

Defendant

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)
)
)
)

Case No.

WAIVER OF AN INDICTMENT

I understand that I have been accused of one or more offenses punishable by imprisonment for more than one year. I was advised in open court of my rights and the nature of the proposed charges against me.

After receiving this advice, I waive my right to prosecution by indictment and consent to prosecution by information.

Date: _____

Defendant's signature

Signature of defendant's attorney

Printed name of defendant's attorney

Judge's signature

PATRICK A. WHITE, U.S. MAGISTRATE JUDGE

Judge's printed name and title