

citizenship (*i.e.*, she was not eligible for naturalization at the time she naturalized), and she procured her citizenship by concealment of a material fact or by willful misrepresentation.

II. PARTIES, JURISDICTION, AND VENUE

1. This is an action filed under 8 U.S.C. § 1451(a) to revoke and set aside the decision admitting Defendant to U.S. citizenship and to cancel Defendant's Certificate of Naturalization No. 37676249.

2. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1345.

3. Venue is proper in this District under 8 U.S.C. § 1451(a) and 28 U.S.C. § 1391, because Defendant can be found in and resides in this District.

4. Plaintiff is the United States of America, suing on behalf of itself.

5. Defendant is a native of Cuba and obtained her U.S. citizenship through naturalization.

6. Defendant's last known address of residence is in Miami-Dade County, Florida.

III. FACTUAL BACKGROUND

7. The affidavit of Calvin Hernandez, a Special Agent with Homeland Security Investigations, a component of the United States Department of Homeland Security, showing good cause for this action, as required by 8 U.S.C. § 1451(a), is attached hereto as Exhibit A.

A. Defendant's Money Laundering Scheme & Federal Conviction

8. Defendant and Johander Jorin Melhen ("Jorin") were married in 2009.

9. From May 17, 2007, through May 28, 2015, Jorin was an employee and licensee of Miccosukee Resort & Gaming in Miami-Dade County.

10. Jorin serviced Electronic Gaming Machines (“EGMs”) at the Miccosukee Casino.

11. Beginning in 2011, and continuing through 2015, Jorin and three other Miccosukee Gaming employees and licensees conspired to commit computer fraud in violation of 18 U.S.C. § 1030(a)(4).

12. Jorin and his co-conspirators caused EGMs at the Miccosukee Casino to generate false and fraudulent credit vouchers, which they then presented to Miccosukee Gaming, in exchange for cash.

13. Through this scheme, Jorin and his co-conspirators embezzled approximately \$5,300,000 from Miccosukee Gaming.

14. The cash that Jorin and his co-conspirators obtained from the redemption of the credit vouchers represented the proceeds of computer fraud, in violation of 18 U.S.C. § 1030(a)(4).

15. Beginning as early as January 2011, and continuing through in or around October 2018, Defendant and Jorin conspired to engage in various financial transactions involving the proceeds of computer fraud for the purpose of concealing and disguising the nature, location, source, ownership, and control of the proceeds, and to avoid transaction reporting requirements imposed by federal and state law.

16. For example, in 2011, Defendant opened checking and savings accounts with JPMorgan Chase Bank, listing herself as the sole signatory.

17. Defendant opened these accounts for the purpose of laundering the cash proceeds of computer fraud that Jorin brought home from the Miccosukee Casino.

18. From 2011-2014, Defendant deposited at least \$39,863 in cash proceeds into one account, and at least \$16,830 in cash proceeds into the other account.

19. Defendant received the cash proceeds from Jorin.

20. Defendant knew the funds involved in these transactions were stolen from Miccosukee Gaming.

21. Defendant deposited the cash proceeds to conceal and disguise the nature, location, source, ownership, and control of the proceeds.

22. Moreover, Defendant intentionally structured some of her deposits to avoid transaction reporting requirements imposed by federal or state law. In particular, she structured the deposits so they did not exceed \$10,000 deposited in the same account, on the same day.

23. Defendant and Jorin laundered at least \$147,970 in proceeds of computer fraud.

24. On July 16, 2019, Defendant was charged by an Indictment with (1) Conspiracy to Commit Money Laundering in violation of 18 U.S.C. § 1956(h); (2) Money Laundering in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i) and (ii); (3) Money Laundering in violation of 18 U.S.C. § 1957. *See* Indictment, *United States v. Aleu, et al.*, No. 19-cr-20435 (S.D. Fla.), ECF No. 3.

25. A true and accurate copy of the Indictment described in paragraph 24 is attached hereto as Exhibit B.

26. On January 31, 2020, Defendant and her attorney appeared before a judge in the Southern District of Florida and pleaded guilty to the offense of Conspiracy to Commit Money Laundering in violation of 18 U.S.C. § 1956(h). *See* Change of Plea Minutes, *United States v. Aleu, et al.*, No. 19-cr-20435 (S.D. Fla.), ECF No. 188.

27. A true and accurate copy of the Change of Plea Minutes described in paragraph 26 is attached hereto as Exhibit C.

28. On January 31, 2020, Defendant and her attorney signed a “Stipulated Factual Proffer.” See Stipulated Factual Proffer, *United States v. Aleu, et al.*, No. 19-cr-20435 (S.D. Fla.), ECF No. 189.

29. A true and accurate copy of the Stipulated Factual Proffer described in paragraph 28 is attached hereto as Exhibit D.

30. The Stipulated Factual Proffer contains Defendant’s admission to the facts alleged in the preceding paragraphs 9-23.

31. The facts alleged in the preceding paragraphs 9-23 summarize Defendant’s participation in the crime of Conspiracy to Commit Money Laundering.

32. Following the entry of her guilty plea, the U.S. District Court for the Southern District of Florida convicted Defendant of one count of Conspiracy to Commit Money Laundering in violation of 18 U.S.C. § 1956(h). See Judgment in a Criminal Case, *United States v. Aleu, et al.*, No. 19-cr-20435 (S.D. Fla.), ECF No. 346.

33. A true and accurate copy of the Judgment described in paragraph 32 is attached hereto as Exhibit E.

34. As a result of Defendant’s conviction, the U.S. District Court for the Southern District of Florida sentenced Defendant to 6 months in prison followed by 36 months of supervised release, ordered her to pay \$147,970 in restitution, and ordered her to forfeit her interest in various properties.

B. Defendant’s Naturalization Application and Oath Ceremony

35. On August 19, 2015, Defendant applied to naturalize and become a U.S. citizen by filing a Form N-400, Application for Naturalization (“Naturalization Application”) with U.S. Citizenship and Immigration Services (“USCIS”). *See* Form N-400, Application for Naturalization.

36. A true and accurate copy of Defendant’s Form N-400, Application for Naturalization is attached hereto as Exhibit F.

37. On her Naturalization Application, which she signed under penalty of perjury, Defendant checked “No” in response to Part 11, Question 22, which asked: “Have you ever committed, assisted in committing, or attempted to commit a crime or offense for which you were not arrested?”.

38. Defendant’s answer to Part 11, Question 22, was false, because she had engaged in a criminal conspiracy to commit money laundering beginning in 2011, to which she later admitted and for which she was later convicted.

39. On November 3, 2015, a USCIS officer interviewed Defendant regarding her Naturalization Application to determine her eligibility for naturalization.

40. At the beginning of the interview, the officer placed Defendant under oath.

41. During the interview, the officer asked Defendant, consistent with Part 11, Question 22 of Defendant’s Naturalization Application, whether she had ever committed, assisted in committing, or attempted to commit a crime or offense for which she was not arrested.

42. Defendant orally and under oath confirmed her written response to Part 11, Question 22 of her Naturalization Application, testifying that she had never committed, assisted in committing, or attempted to commit a crime or offense for which she was not arrested.

43. Defendant's testimony regarding her commission of a crime was false, because she had engaged in a criminal conspiracy to commit money laundering beginning in 2011, to which she later admitted and for which she was later convicted.

44. At the end of the interview, Defendant again signed the Naturalization Application under penalty of perjury and swore that the contents of her application were true and correct.

45. At no point during the naturalization process did Defendant disclose to USCIS that she had engaged in a conspiracy to commit money laundering.

46. Based upon the information Defendant supplied on her Naturalization Application and on the sworn answers she gave during her naturalization interview, USCIS approved the application on November 3, 2015.

47. On November 6, 2015, Defendant took the Oath of Allegiance to become a U.S. citizen. She was issued Certificate of Naturalization No. 37676249. *See* Form N-550, Certificate of Naturalization.

48. A true and accurate copy of Defendant's Certificate of Naturalization is attached as Exhibit G.

IV. GOVERNING LAW

A. Congressionally Imposed Prerequisites to the Acquisition of U.S. Citizenship.

49. No individual has a right to naturalization "unless all statutory requirements are complied with." *United States v. Ginsberg*, 243 U.S. 472, 474-75 (1917). Indeed, the Supreme Court has underscored that "[t]here must be strict compliance with all the congressionally imposed prerequisites to the acquisition of citizenship." *Fedorenko v. United States*, 449 U.S. 490, 506 (1981); *see also id.* (an individual "who seeks political rights as a member of the Nation

can rightfully obtain them only upon the terms and conditions specified by Congress.” (quoting *Ginsberg*, 243 U.S. at 474)).

50. Among other requirements, Congress has mandated that an individual may not naturalize unless that person “during all periods referred to in this subsection has been and still is a person of good moral character” *See* 8 U.S.C. § 1427(a)(3). The required statutory period for good moral character begins five years before the date the applicant files the application for naturalization, and it continues until the applicant takes the oath of allegiance and becomes a U.S. citizen. *Id.*; 8 C.F.R. § 316.10(a).

51. Although Congress has not specifically defined what constitutes good moral character for naturalization purposes, the Immigration and Nationality Act lists certain classes of applicants who cannot be found to have the requisite good moral character. 8 U.S.C. § 1101(f).

52. Congress has explicitly precluded individuals who give false testimony for the purpose of obtaining immigration benefits from being able to establish the good moral character necessary to naturalize. 8 U.S.C. § 1101(f)(6).

53. Further, Congress created a “catch-all” provision, which states, “[t]he fact that any person is not within any of the foregoing classes shall not preclude a finding that for other reasons such person is or was not of good moral character.” 8 U.S.C. § 1101(f).

54. Individuals who commit unlawful acts adversely reflecting upon their moral character cannot meet the good moral character requirement, unless they prove that extenuating circumstances existed that would ameliorate or palliate their guilt. *See* 8 C.F.R. § 316.10(b)(3)(iii); 8 U.S.C. § 1101(f).

55. Thus, an individual unlawfully procured naturalization if he or she committed unlawful acts during the statutory period, even if he or she was convicted of those crimes after

being granted citizenship. *See United States v. Jean-Baptiste*, 395 F.3d 1190, 1193-94 (11th Cir. 2005), *cert. denied*, 546 U.S. 852 (2005).

B. The Denaturalization Statute

56. Recognizing that there are situations where an individual has naturalized despite failing to comply with all congressionally imposed prerequisites to the acquisition of citizenship or by concealing or misrepresenting facts that are material to the decision on whether to grant his or her naturalization application, Congress enacted 8 U.S.C. § 1451.

57. Under 8 U.S.C. § 1451(a), this Court must revoke an order of naturalization and cancel the individual's Certificate of Naturalization if his or her naturalization was *either*:

- i. illegally procured, *or*
- ii. procured by concealment of a material fact or by willful misrepresentation.

58. Failure to comply with any of the congressionally imposed prerequisites to the acquisition of citizenship renders the citizenship “illegally procured.” *Fedorenko*, 449 U.S. at 506.

59. Naturalization was procured by concealment of a material fact or by willful misrepresentation, where: (1) the naturalized citizen misrepresented or concealed some fact during the naturalization process; (2) the misrepresentation or concealment was willful; (3) the fact was material; and (4) the naturalized citizen procured citizenship as a result of the misrepresentation or concealment. *See Kungys v. United States*, 485 U.S. 759, 767 (1988).

60. Where the government establishes that the defendant's citizenship was procured illegally or by willful misrepresentation or concealment of material facts, “district courts lack

equitable discretion to refrain from entering a judgment of denaturalization.” *Fedorenko*, 449 U.S. at 517.

V. CAUSES OF ACTION

COUNT I

ILLEGAL PROCUREMENT OF NATURALIZATION LACK OF GOOD MORAL CHARACTER (UNLAWFUL ACTS THAT REFLECT ADVERSELY ON MORAL CHARACTER)

61. The United States re-alleges and incorporates by reference the factual and legal allegations contained in Sections II through IV of this Complaint.

62. To be eligible for naturalization, Defendant was required to establish that she was a person of good moral character from August 19, 2010, five years prior to the date she filed the Naturalization Application, until November 6, 2015, the date she became a U.S. citizen.

63. Defendant could not establish the requisite good moral character for naturalization because she committed unlawful acts during the statutory period that reflected adversely on her moral character, and there were no extenuating circumstances that would lessen her guilt. 8 U.S.C. § 1101(f); 8 C.F.R. § 316.10(b)(3)(iii).

64. Specifically, as set forth above at paragraphs 9 through 23, beginning in 2011, Defendant conspired with Jorrin to launder cash proceeds that Jorrin and his co-conspirators illegally procured through computer fraud. Defendant knew the proceeds involved in these transactions were stolen from Miccosukee Gaming, and she acted to conceal and disguise the nature, location, source, ownership, and control of the proceeds.

65. On January 31, 2020, Defendant appeared before a judge in the Southern District of Florida and pleaded guilty to the offense of Conspiracy to Commit Money Laundering in violation of 18 U.S.C. § 1956(h).

66. Defendant committed the crime of Conspiracy to Commit Money Laundering within the statutory period.

67. The crime of Conspiracy to Commit Money Laundering adversely reflected upon Defendant's moral character.

68. Defendant cannot establish extenuating circumstances with regard to the conduct underlying her guilty plea that would render her conduct less reprehensible than it otherwise would be or that tend to palliate or mitigate her guilt. She therefore cannot avoid the regulatory bar on establishing good moral character found in 8 C.F.R. § 316.10(b)(3)(iii).

69. Defendant's unlawful conduct precluded her under 8 U.S.C. § 1101(f) and 8 C.F.R. § 316.10(b)(3)(iii) from showing that she had the good moral character necessary to become a naturalized U.S. citizen.

70. Because Defendant was not a person of good moral character, she was ineligible for naturalization under 8 U.S.C. § 1427(a)(3).

71. Because Defendant was ineligible to naturalize, she illegally procured her naturalization, and this Court must revoke her citizenship, as provided for by 8 U.S.C. § 1451(a).

COUNT II

ILLEGAL PROCUREMENT OF NATURALIZATION LACK OF GOOD MORAL CHARACTER (FALSE TESTIMONY)

72. The United States re-alleges and incorporates by reference the factual and legal allegations contained in Sections II through IV of this Complaint.

73. To be eligible for naturalization, Defendant was required to establish that she was a person of good moral character from August 19, 2010, five years prior to the date she filed the Naturalization Application, until November 6, 2015, the date she became a U.S. citizen.

74. Defendant was statutorily precluded from showing that she was a person of good moral character, because she gave false testimony, orally and under oath, during the statutory period, for the purpose of obtaining an immigration benefit, to wit, naturalization. 8 U.S.C. § 1101(f)(6); 8 C.F.R. § 316.10(b)(2)(vi).

75. During the statutory period, Defendant provided false testimony for the purpose of obtaining an immigration benefit when she swore, orally and under oath, during her November 3, 2015 naturalization interview, that she had never committed, assisted in committing, or attempted to commit a crime or offense for which she was not arrested.

76. Defendant's testimony was knowingly false and for the purpose of obtaining an immigration benefit, namely, naturalization.

77. Because Defendant provided false testimony under oath for the purpose of obtaining her naturalization, she was barred under 8 U.S.C. § 1101(f)(6) from showing that she had the good moral character necessary to become a naturalized U.S. citizen.

78. Because Defendant was not a person of good moral character, she was ineligible for naturalization under 8 U.S.C. § 1427(a)(3).

79. Because she was ineligible to naturalize, Defendant illegally procured her citizenship.

80. Because Defendant illegally procured her citizenship, this Court must revoke her citizenship, as provided for by 8 U.S.C. § 1451(a).

COUNT III

PROCUREMENT OF U.S. CITIZENSHIP BY CONCEALMENT OF A MATERIAL FACT OR WILLFUL MISREPRESENTATION

81. The United States re-alleges and incorporates by reference the factual and legal allegations contained in Sections II through IV of this Complaint.

82. Under 8 U.S.C. § 1451(a), this Court must revoke Defendant's citizenship and cancel her Certificate of Naturalization because she procured her naturalization by concealment of a material fact and by willful misrepresentation.

83. As set forth above, throughout the naturalization process, Defendant willfully misrepresented and concealed her involvement in a criminal conspiracy to launder money, for which she later pleaded guilty in the U.S. District Court for the Southern District of Florida to one count of Conspiracy to Commit Money Laundering.

84. Specifically, Defendant represented on her naturalization application and during her naturalization interview that she had never committed, assisted in committing, or attempted to commit a crime or offense for which she was not arrested, despite knowing that such representation was false and misleading.

85. Defendant knew the representation that she had never committed, assisted in committing, or attempted to commit a crime or offense for which she was not arrested was false because starting in 2011, she had been member of a conspiracy to launder money that was illegally procured through fraud, which she had joined with knowledge of its unlawful purpose, as she later admitted to in her Stipulated Factual Proffer and for which she was later convicted.

86. Defendant's misrepresentations were material to her naturalization because the disclosure of her money laundering scheme would have had a natural tendency to influence USCIS's decision whether to approve Defendant's naturalization application as they related to statutory eligibility criteria for such benefit.

87. Had Defendant disclosed the truth about her criminal conduct, USCIS would have discovered her statutory ineligibility for naturalization and could not have approved her application or administered the oath of allegiance.

88. Defendant thus procured her naturalization by willful misrepresentation and concealment of material facts, and this Court must revoke her citizenship pursuant to the requirements of 8 U.S.C. § 1451(a).

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, the United States of America, requests:

1. A declaration that Defendant illegally procured her citizenship;
2. A declaration that Defendant procured her citizenship by concealment and willful misrepresentation of material facts;
3. Judgment revoking and setting aside Defendant's naturalization and canceling Certificate of Naturalization No. 37676249, effective as of the original date of the order and certificate, November 6, 2015;
4. Judgment forever restraining and enjoining Defendant from claiming any rights, privileges, benefits, or advantages related to U.S. citizenship that she obtained as a result of her November 6, 2015 naturalization;
5. Judgment requiring Defendant to surrender and deliver, within ten days of the entry of judgment against her, her Certificate of Naturalization and any copies thereof in her possession – and to make good faith efforts to recover and immediately surrender any copies thereof that she knows are in the possession of others – to the Acting Attorney General or to his representative, including undersigned counsel;
6. Judgment requiring Defendant to surrender and deliver, within ten days of the entry of judgment against her, any other indicia of U.S. citizenship (including, but not limited to, U.S. passports, passport cards, and Enhanced Drivers Licenses, whether valid or expired), and any copies thereof in her possession – and to make good faith efforts to recover and then

surrender any copies thereof that she knows are in the possession of others – to the Acting Attorney General or to his representative, including undersigned counsel; and

7. Judgment granting the United States such other relief as may be lawful and proper in this case.

Dated: June 8, 2026

JASON A. REDING QUIÑONES
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Southern District of Florida

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Respectfully submitted,

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JOHN J.W. INKELES
Chief, Denaturalization Unit

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United States of America

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.) NOTICE: Attorneys MUST Indicate All Re-filed Cases Below.

I. (a) PLAINTIFFS

DEFENDANTS

(b) County of Residence of First Listed Plaintiff (EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) Attorneys (Firm Name, Address, and Telephone Number)

Attorneys (If Known)

(d) Check County Where Action Arose: MIAMI-DADE MONROE BROWARD PALM BEACH MARTIN ST. LUCIE INDIAN RIVER OKEECHOBEE HIGHLANDS

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- 1 U.S. Government Plaintiff
2 U.S. Government Defendant
3 Federal Question (U.S. Government Not a Party)
4 Diversity (Indicate Citizenship of Parties in Item III)

- Citizen of This State
Citizen of Another State
Citizen or Subject of a Foreign Country
PTF DEF 1 1 Incorporated or Principal Place of Business In This State
2 2 Incorporated and Principal Place of Business In Another State
3 3 Foreign Nation
4 4
5 5
6 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions

Table with columns: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES. Includes various legal categories like Insurance, Personal Injury, Real Estate, etc.

V. ORIGIN

(Place an "X" in One Box Only)

- 1 Original Proceeding
2 Removed from State Court
3 Re-filed (See VI below)
4 Reinstated or Reopened
5 Transferred from another district (specify)
6 Multidistrict Litigation Transfer
7 Appeal to District Judge from Magistrate Judgment
8 Multidistrict Litigation - Direct File
9 Reremanded from Appellate Court

VI. RELATED/ RE-FILED CASE(S)

(See instructions): a) Re-filed Case YES NO b) Related Cases YES NO

JUDGE:

DOCKET NUMBER:

Cite the U.S. Civil Statute under which you are filing and Write a Brief Statement of Cause (Do not cite jurisdictional statutes unless diversity):

VII. CAUSE OF ACTION

LENGTH OF TRIAL via days estimated (for both sides to try entire case)

VIII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

ABOVE INFORMATION IS TRUE & CORRECT TO THE BEST OF MY KNOWLEDGE

DATE SIGNATURE OF ATTORNEY OF RECORD

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

I. (a) Plaintiffs-Defendants. Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.

(b) County of Residence. For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the “defendant” is the location of the tract of land involved.)

(c) Attorneys. Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section “(see attachment)”.

II. Jurisdiction. The basis of jurisdiction is set forth under Rule 8(a), F.R.C.P., which requires that jurisdictions be shown in pleadings. Place an “X” in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
 United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an “X” in this box.
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked. Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; federal question actions take precedence over diversity cases.)

III. Residence (citizenship) of Principal Parties. This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

IV. Nature of Suit. Nature of Suit. Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).

V. Origin. Place an “X” in one of the seven boxes.

Original Proceedings. (1) Cases which originate in the United States district courts.

Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.

Refiled (3) Attach copy of Order for Dismissal of Previous case. Also complete VI.

Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.

Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.

Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.

Appeal to District Judge from Magistrate Judgment. (7) Check this box for an appeal from a magistrate judge’s decision.

Remanded from Appellate Court. (8) Check this box if remanded from Appellate Court.

VI. Related/Refiled Cases. This section of the JS 44 is used to reference related pending cases or re-filed cases. Insert the docket numbers and the corresponding judges name for such cases.

VII. Cause of Action. Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553

Brief Description: Unauthorized reception of cable service

VIII. Requested in Complaint. Class Action. Place an “X” in this box if you are filing a class action under Rule 23, F.R.Cv.P.
 Demand. In this space enter the dollar amount (in thousands of dollars) being demanded or indicate other demand such as a preliminary injunction.
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

Date and Attorney Signature. Date and sign the civil cover sheet.

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

_____)	
UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	
)	
MILAGROS MARILEISIS ACOSTA)	1:26-cv-24000
TORRES,)	
a/k/a Milagros Marile Acosta Torres,)	
a/k/a Milagros M. Acosta Torres,)	
a/k/a Milagros M. Acosta,)	
a/k/a Milagros M. Torres,)	
,)	
)	
Defendant.)	

SUMMONS IN A CIVIL ACTION TO REVOKE NATURALIZATION

TO: MILAGROS MARILEISIS ACOSTA TORRES
14247 SW 165th St.
Miami, FL 33177

A lawsuit has been filed against you.

Under 8 U.S.C. § 1451(b), within 60 days after service of this summons on you (not counting the day you received it), you must serve on the Plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the Plaintiff's attorney, whose name and address are:

Drew Brinkman
U.S. Department of Justice, Civil Division, Office of Immigration Litigation
P.O. Box 878, Ben Franklin Station, Washington, DC 20044

If you fail to respond, Plaintiff may move the Court for judgment against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Date: _____

CLERK OF COURT

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____; or

I left the summons at the individual's residence or usual place of abode with *(name)*
_____, a person of suitable age and discretion
who resides there, on *(date)* _____, and mailed a copy to the
individual's last known address; or

I served the summons on *(name of individual)* _____,
who is designated by law to accept service of process on behalf of *(name of organization)*
_____ on *(date)* _____; or

I returned the summons unexecuted because _____; or

Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

Exhibit A

UNITED STATES OF AMERICA)
)
 MIAMI, FLORIDA)
)
 In the Matter of the Revocation)
 of the Naturalization of)
)
 Milagros Marileisis ACOSTA TORRES,)
)
 Defendant.)
 _____/

AFFIDAVIT OF GOOD CAUSE

I, Calvin Hernandez, declare under penalty of perjury as follows:

1. I am a Special Agent with Homeland Security Investigations (“HSI”), a component of the United States Department of Homeland Security (“DHS”) and have been so employed since April 2020. I am responsible for conducting investigations of violations of immigration law and related federal criminal statutes as contained in the United States Code. In this capacity, I have access to the official records of the DHS, including the immigration file of Milagros Marileisis ACOSTA TORRES (ACOSTA TORRES), Alien Registration Number [REDACTED] 518.

2. I have examined records relating to ACOSTA TORRES. Based on a review of those records, I state, on information and belief, that the information set forth in this Affidavit of Good Cause is true and correct.

3. ACOSTA TORRES’ last known address is [REDACTED] Miami, FL 33177.

I. IMMIGRATION HISTORY

4. ACOSTA TORRES was born on [REDACTED] 1986, in [REDACTED] Cuba.

5. ACOSTA TORRES entered the United States without inspection on June 27, 2010.

6. On that same date, ACOSTA TORRES was issued a Notice to Appear (NTA) charging her as inadmissible to the United States pursuant to sections 212(a)(6)(A)(i) and

212(a)(7)(A)(i)(I) of the Immigration and Nationality Act (INA). The NTA was never filed with the immigration court.

7. On August 09, 2010, ACOSTA TORRES was paroled into the United States with a parole valid until August 08, 2012.

8. On July 07, 2011, ACOSTA TORRES filed Form I-485, Application to Register Permanent Residence or Adjust Status under the Cuban Adjustment Act (CAA) with the DHS, United States Citizenship and Immigration Services (USCIS).

9. On October 31, 2011, ACOSTA TORRES was interviewed on the application to determine her eligibility for adjustment of status.

10. Based on the information in her adjustment of status application, her testimony at the adjustment of status interview, and the documentary evidence provided, ACOSTA TORRES' application for adjustment of status was approved on October 31, 2011.

11. Pursuant to the CAA, ACOSTA TORRES' permanent residence approval was backdated to June 27, 2010, which is the date she entered the United States.

12. On August 19, 2015, ACOSTA TORRES filed an application for naturalization, Form N-400 with USCIS.

13. On November 03, 2015, ACOSTA TORRES was interviewed by the USCIS Immigration Services Officer Jerieta Miller to determine her eligibility for naturalization.

14. Based on the information in her naturalization application, her testimony at the naturalization interview, and the documentary evidence provided, ACOSTA TORRES' application for naturalization was recommended for approval on November 03, 2015.



15. Before taking the oath of allegiance, ACOSTA TORRES submitted DHS Form N-445, Notice of Naturalization Oath Ceremony to USCIS. On Form N-445, ACOSTA TORRES indicated that she had not committed any crimes for which she had not been arrested.

16. On November 06, 2015, ACOSTA TORRES took the oath of allegiance and was admitted as a citizen of the United States. She was issued Certificate of Naturalization No. 37676249.

II. ACOSTA TORRES illegally procured her naturalization because she committed unlawful acts that adversely reflected upon her moral character.

17. As an applicant of naturalization pursuant to section 316(a) of the INA, 8 U.S.C. § 1427(a), ACOSTA TORRES was required to prove that she was a person of good moral character from August 19, 2010, five years before she filed her application for naturalization, until November 06, 2015, the date on which she was admitted as a citizen of the United States (the statutory period).

18. No person shall be regarded as or found to be a person of good moral character if he or she engages in certain acts, including commission of a crime involving moral turpitude (CIMT), commission of an aggravated felony and giving false testimony to obtain an immigration benefit, or for other reasons, including unlawful acts, that demonstrate he or she was not of good moral character. INA § 101(f), 8 U.S.C. § 1101(f).

19. Unless there are extenuating circumstances, an applicant for naturalization is precluded from establishing good moral character if, during the statutory period, she commits unlawful acts that adversely reflect upon her moral character. INA § 101(f); 8 U.S.C. § 1101(f); 8 C.F.R. § 316.10(b)(3)(iii).



20. ACOSTA TORRES could not have established that she was person of good moral character during the statutory period because she committed unlawful acts that adversely reflect upon her moral character.

21. On or around January 2011, and continuing through the date she naturalized, ACOSTA TORRES committed the illegal act of Conspiracy to Commit Money Laundering, an act in violation of 18 U.S.C. § 1956(h).

22. ACOSTA TORRES, along with co-conspirators, conspired to engage in various financial transactions involving the proceeds of computer fraud for the purpose of concealing and disguising the nature, location, source, ownership, and control of the proceeds, and to avoid transaction reporting requirements imposed by federal and state law. Further, they conspired to engage in monetary transactions involving more than \$10,000 of proceeds. ACOSTA TORRES knew that the funds involved in these transactions were the proceeds of some form of unlawful activity.

23. ACOSTA TORRES, along with co-conspirators, utilized funds obtained through the computer fraud scheme to purchase real property, vehicles, and Florida College Pre-paid accounts.

24. On January 31, 2020, after her naturalization, ACOSTA TORRES plead guilty in the United States District Court for the Southern District of Florida in case number 19-20435-CR-GAYLES, to one count of Conspiracy to Commit Money Laundering in violation of section 18 U.S.C. § 1956(h).

25. On July 24, 2020, ACOSTA TORRES was sentenced to a term of imprisonment of six (6) months, to be followed by three (3) years of supervised release. ACOSTA TORRES was



also ordered to pay criminal monetary penalties in the amount of \$147,970.00 which represents the amount involved in the money laundering scheme for which she pled guilty.

26. As evidenced by her post-naturalization conviction, there were no extenuating circumstances that could have mitigated the effect of ACOSTA TORRES' actions on her ability to establish good moral character.

27. Because ACOSTA TORRES committed unlawful acts within the statutory period, she was precluded from establishing good moral character. Consequently, she illegally procured her naturalization.

III. ACOSTA TORRES could not establish that she was a person of good moral character because she provided false testimony during her naturalization interview.

28. An applicant lacks good moral character if she gives false testimony for the purpose of obtaining an immigration benefit. INA § 101(f)(6); 8 U.S.C § 1101(f)(6). Naturalization is an immigration benefit under the Immigration and Nationality Act.

29. On or about August 12, 2015, ACOSTA TORRES signed the N-400 thereby certifying, under penalty of perjury, that her N-400 and the evidence submitted with it were true and correct.

30. On November 3, 2015, ACOSTA TORRES appeared for her naturalization interview. At the beginning of the interview, ACOSTA TORRES took an oath that she would answer all questions truthfully.

31. In response to Question 22 in Part 11, page 15 of the N-400, which asks whether "Have you ever committed, assisted in committing, or attempted to commit, a crime or offense for which you were not arrested?", ACOSTA TORRES answered, "no." She affirmed her negative response under oath when she testified at the naturalization interview. This testimony was false.

In fact, ACOSTA TORRES had conspired with others to commit money laundering prior to providing the written and testimonial responses to Question 22 in Part 11, page 15 of the N-400.

32. At the end of her naturalization interview, ACOSTA TORRES signed her N-400 and again swore and affirmed under penalty of perjury that the contents of her N-400 were true.

33. Because ACOSTA TORRES provided false testimony to obtain naturalization during the statutory period, she could not have established good moral character. Therefore, she illegally procured her naturalization.

IV. ACOSTA TORRES procured her naturalization by willful misrepresentation or concealment of material facts.

34. A naturalized citizen is subject to revocation of naturalization if she procured naturalization by willfully misrepresenting or concealing material facts. INA § 240(a); 8 U.S.C. § 1451(a).

35. ACOSTA TORRES procured her naturalization by willful misrepresentation and concealment of material facts pertaining to her criminal activity.

- a. On August 19, 2015, ACOSTA TORRES filed her application for naturalization. On the Form N-400, ACOSTA TORRES marked “no,” to the question: “Have you ever committed, assisted in committing, or attempted to commit, a crime or offense for which you were not arrested?”
- b. On November 06, 2015, before taking the oath of allegiance, ACOSTA TORRES submitted Form N-445, Notice of Naturalization Oath Ceremony, to USCIS. On the Form N-445, ACOSTA TORRES marked “no,” to the question: “Since your interview, have you knowingly committed any crime or offense, for which you have not been arrested?”



c. ACOSTA TORRES' statements were false. From January 2011 through the date she naturalized, ACOSTA TORRES was engaged in a conspiracy to commit money laundering in violation 18 U.S.C. § 1956(h).

36. The misrepresentations made by ACOSTA TORRES during the naturalization process were material to determining her eligibility for naturalization because they would have had a natural tendency to influence the decision whether to approve her N-400. In fact, ACOSTA TORRES' criminal activity would have precluded her from establishing good moral character. Consequently, ACOSTA TORRES procured her citizenship as a result of the misrepresentation or concealment.

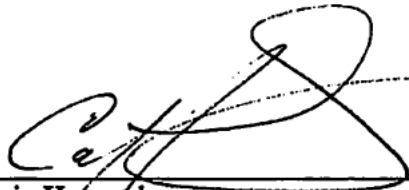
37. Because ACOSTA TORRES procured her naturalization by willfully misrepresenting and concealing material facts regarding her criminal activity, her citizenship is subject to revocation.

38. Based on the facts outlined in the foregoing paragraphs, good cause exists to institute proceedings pursuant to section 340(a) of the INA, 8 U.S.C. § 1451(a), to revoke ACOSTA TORRES' citizenship and to cancel her certificate of naturalization.

**DECLARATION IN LIEU OF JURAT
(28 U.S.C. § 1746)**

I declare under penalty of perjury that the foregoing is true and correct. Executed on this

23 day of April, 2026.



Calvin Hernandez
Special Agent
Department of Homeland Security
U.S. Immigration and Customs Enforcement
Miami, Florida



Exhibit B

Case 1:19-cr-20435-DPG Document 3 Entered on FLSD Docket 07/17/2019 Page 1 of 46 D.C.

FILED BY [Signature] D.C.
JUL 16 2019
ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - MIAMI

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO.: 19-20435 CR-GAYLES

MOTAZO-REYES

18 U.S.C. § 371
18 U.S.C. § 1168(b)
18 U.S.C. § 1030(b)
18 U.S.C. § 1030(a)(4)
18 U.S.C. § 1956(h)
18 U.S.C. § 1956(a)(1)(B)(i) and (ii)
18 U.S.C. § 1957
18 U.S.C. § 2
18 U.S.C. § 1001(a)(2)
18 U.S.C. § 982(a)(2)(B)
18 U.S.C. § 1030(i)
18 U.S.C. § 982(a)(1)

UNITED STATES OF AMERICA

vs.

**MICHEL ALEU,
MARIA DEL PILAR ALEU,
a/k/a "Maria Aleu,"
a/k/a "Maria D. Aleu,"
LESTER LAVIN,
ANISLEYDI VERGEL HERMIDA,
a/k/a "Anisleydi Vergel,"
YOHANDER JORRIN MELHEN,
a/k/a "Yohander Jorrin,"
a/k/a "Yohander J. Melhen,"
MILAGROS MARILE ACOSTA TORRES,
a/k/a "Milagros Marileisis Acosta Torres,"
a/k/a "Milagros M. Acosta Torres,"
a/k/a "Milagros M. Acosta,"
a/k/a "Milagros M. Torres,"
LEONARDO BETANCOURT, and
YUSMARY SHIRLEY DURAN,
a/k/a "Yusmary S. Duran Mejia,"**

Defendants.

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At various times material to this Indictment:

Miccosukee Resort & Gaming

1. **Miccosukee Tribe of Indians of Florida (the "Miccosukee Tribe") was an Indian tribe, band, and nation recognized by the United States of America.**

2. **Miccosukee Resort & Gaming ("Miccosukee Gaming") was a gaming establishment in Miami-Dade County, Florida, operated by and for, and licensed by, the Miccosukee Tribe, through the Miccosukee Tribal Gaming Agency ("MTGA"), pursuant to an ordinance and resolution approved by the National Indian Gaming Commission ("NIGC").**

3. **Miccosukee Gaming issued gaming licenses to certain employees ("individual licensees") as a term and condition of employment in its gaming establishment.**

AGS Electronic Gaming Machines

4. **AGS, a/k/a PlayAGS, Inc. ("AGS"), was a designer, manufacturer, supplier, and servicer of Electronic Gaming Machines ("EGMs"), including video slot machines, which it sold or leased to tribal gaming establishments. AGS's headquarters was located in Las Vegas, Nevada, and AGS EGMs were manufactured outside of Florida.**

5. **Miccosukee Gaming purchased and leased EGMs from AGS for use at its gaming establishment in Miami-Dade County. The AGS EGMs contained electronic, magnetic, optical, electrochemical, or other high speed data processing devices, which performed logical, arithmetic, or storage functions, and were directly related to and operated in conjunction with data storage facilities. Further, the AGS EGMs located at Miccosukee Gaming were used in and affected interstate and foreign commerce, and therefore, were "computers" and "protected computers" as those terms are defined in Title 18, United States Code, Sections 1030(e)(1) and 1030(e)(2)(B).**

6. **Miccosukee Gaming's EGMs did not have slots in which players could insert coins. Even though the EGMs did not receive coins, the EGMs' software was designed to recognize the insertion of coins, by recording a "coin-in" amount. The "coin-in" amount was the monetary value of coins supposedly inserted in the EGM.**

Defendants

7. **Defendant MICHEL ALEU was an individual who resided in Miami-Dade County, and an employee, and an individual licensee of Miccosukee Gaming.**

8. **Defendant MARIA DEL PILAR ALEU, a/k/a "Maria Aleu," a/k/a "Maria D. Aleu" ("MARIA ALEU") was an individual who resided in Miami-Dade County.**

9. **Defendant LESTER LAVIN ("LAVIN") was an individual who resided in Miami-Dade County, and an employee, and an individual licensee of Miccosukee Gaming.**

10. **Defendant ANISLEYDI VERGEL HERMIDA, a/k/a "Anisleydi Vergel" ("VERGEL") was an individual who resided in Miami-Dade County.**

11. **Defendant YOHANDER JORRIN MELHEN, a/k/a "Yohander Jorrin," a/k/a "Yohander J. Melhen" ("JORRIN") was an individual who resided in Miami-Dade County, and an employee, and an individual licensee of Miccosukee Gaming.**

12. **Defendant MILAGROS MARILE ACOSTA TORRES, a/k/a "Milagros Marileisis Acosta Torres," a/k/a "Milagros M. Acosta Torres," a/k/a "Milagros M. Acosta," a/k/a "Milagros M. Torres" ("ACOSTA") was an individual who resided in Miami-Dade County.**

13. **Defendant LEONARDO BETANCOURT ("BETANCOURT") was an individual who resided in Miami-Dade County, and an employee, and an individual licensee of Miccosukee Gaming.**

14. Defendant **YUSMARY SHIRLEY DURAN, a/k/a "Yusmary S. Duran Mejia,"** ("**DURAN**") was an individual who resided in Miami-Dade County.

Financial Institutions

15. **Bank of America, N.A. ("Bank of America"), Branch Banking and Trust Company ("BB&T"), JPMorgan Chase Bank, N.A. ("Chase Bank"), and Wells Fargo Bank, N.A. ("Wells Fargo Bank"),** were banks whose deposits were insured by the Federal Deposit Insurance Corporation ("**FDIC**") in accordance with Chapter 16, Title 12, United States Code, and were "**insured banks**" as defined in Title 12, United States Code, Section 1813(h). Accordingly, **Bank of America, BB&T, Chase Bank, and Wells Fargo Bank** were "**financial institutions**" as defined in Title 31, United States Code, Section 5312(a)(2)(A), and Title 18, United States Code, Section 1956(c)(6)(A).

16. **Wells Fargo Home Mortgage** was a loan or finance company. Accordingly, **Wells Fargo Home Mortgage** was a "**financial institution**" as defined in Title 31, United States Code, Section 5312(a)(2)(P), and Title 18, United States Code, Section 1956(c)(6)(A).

17. **La Mesa RV Center, Inc., Lorenzo Bomnin Chevrolet, Bomnin Chevrolet Dadeland, f/k/a Bomnin Chevrolet Kendall, and Off Lease Only, Inc.,** were businesses engaged in vehicle sales; accordingly, they were "**financial institutions**" as defined in Title 31, United States Code, Section 5312(a)(2)(T), and Title 18, United States Code, Section 1956(c)(6)(A).

COUNT 1

**Conspiracy to Embezzle More Than \$1,000 from a Tribal Gaming Establishment
(18 U.S.C. § 371)**

1. Paragraphs 1 to 7, 9, 11, and 13 of the General Allegations section of this Indictment are re-alleged and fully incorporated herein by reference.

2. From on or about January 29, 2011, and continuing through on or about May 27,

2015, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**MICHEL ALEU,
LESTER LAVIN,
YOHANDER JORRIN MELHEN,
a/k/a "Yohander Jorrin,"
a/k/a "Yohander J. Melhen," and
LEONARDO BETANCOURT,**

did knowingly and willfully combine, conspire, confederate, and agree with each other and with other persons known and unknown to the Grand Jury, to commit offenses against the United States, that is, being employees and individual licensees of a gaming establishment operated by and for and licensed by an Indian tribe, that is Miccosukee Gaming, pursuant to an ordinance or resolution approved by the National Indian Gaming Commission, to embezzle, abstract, purloin, willfully misapply, and take and carry away with intent to steal, moneys, funds, assets, and other property of such gaming establishment, having a value in excess of \$1,000, in violation of Title 18, United States Code, Section 1168(b).

PURPOSE OF THE CONSPIRACY

3. It was the purpose of the conspiracy for the defendants and their co-conspirators to unjustly enrich themselves by causing Miccosukee Gaming's EGMs to generate false and fraudulent credit vouchers, which the defendants and their co-conspirators presented to Miccosukee Gaming, in exchange for cash, for their personal use and benefit.

MANNER AND MEANS OF THE CONSPIRACY

4. The defendants and their co-conspirators employed a method of generating and recording false and fraudulent "coin-in" amounts totaling thousands of dollars, on the EGMs. The defendants and their co-conspirators would then cause the EGMs to generate false and fraudulent credit vouchers for "coin-in" amounts. They would then enlist co-conspirators to redeem those vouchers for cash in excess of \$1,000 at Miccosukee Gaming.

5. To generate and record the false and fraudulent "coin-in" amounts, the defendants and their conspirators would open an EGM, and connect one end of a wire to a location inside the EGM where a device that would recognize coins might be attached. They would then connect the other end of the wire to another metal surface inside the cabinet which would cause the EGM to generate and record false and fraudulent "coin-in" amounts. On occasions when the defendants and their co-conspirators caused an EGM to generate and record false and fraudulent "coin-in" amounts, they would cause the EGM to generate, record, and print false and fraudulent credit vouchers for all or some of the "coin-in" amounts. In an attempt to conceal their fraudulent activity, the defendants and their co-conspirators would typically conduct a "hard reset" or "RAM clear" of the EGM, which would delete the history of the false and fraudulent "coin-in" amounts from the EGM.

6. The defendants then enlisted co-conspirators to present the false and fraudulent credit vouchers to Miccosukee Gaming in exchange for cash. The defendants' co-conspirators redeemed the false and fraudulent vouchers by: inserting them in Miccosukee Gaming's on-site ATMs; presenting them to cashiers on the floor of the casino; and presenting them to Miccosukee Gaming's treasury.

7. Pursuant to the aforesaid manner and means, the defendants and their co-conspirators embezzled approximately \$5.3 million from Miccosukee Gaming.

OVERT ACTS

In furtherance of the conspiracy, and to achieve the objects thereof, at least one of the conspirators committed and caused to be committed, in Miami-Dade County, in the Southern District of Florida, and elsewhere, at least one of the following overt acts, among others:

8. On or about March 14, 2011, LESTER LAVIN caused a RAM clear on AGS EGM

number PT902-22.

9. On or about November 26, 2011, MICHEL ALEU caused a RAM clear on AGS EGM number PT927-16.

10. On or about January 25, 2012, LEONARDO BETANCOURT caused a RAM clear on AGS EGM number PT914-09.

11. On or about June 27, 2012, YOHANDER JORRIN MELHEN caused a RAM clear on AGS EGM number PT918-11.

12. On or about May 4, 2015, YOHANDER JORRIN MELHEN accessed AGS EGM number PT906-08, and caused that EGM to record false and fraudulent "coin-in" amounts.

13. On or about May 4, 2015, YOHANDER JORRIN MELHEN accessed AGS EGM number PT906-08, and caused that EGM to generate false and fraudulent credit vouchers.

14. On or about May 6, 2015, LESTER LAVIN and LEONARDO BETANCOURT accessed EGM number PT910-09, and caused that EGM to record false and fraudulent "coin-in" amounts.

15. On or about May 6, 2015, LESTER LAVIN and LEONARDO BETANCOURT caused the withdrawal of approximately \$1,197.25 from Miccosukee Gaming ATM no. CT102, in exchange for a false and fraudulent credit voucher number ending in 3009, which they caused to be inserted in that ATM.

16. On or about May 27, 2015, LESTER LAVIN caused EGM number PT909-09 to generate false and fraudulent credit vouchers.

17. On or about May 27, 2015, YOHANDER JORRIN MELHEN accessed AGS EGM number PT917-07, and caused that EGM to record false and fraudulent "coin-in" amounts.

18. On or about May 27, 2015, MICHEL ALEU engaged a Miccosukee Gaming

Security Officer in conversation, while the Security Officer was at AGS EGM number PT917-07 to observe YOHANDER JORRIN MELHEN service that EGM.

19. On or about May 27, 2015, YOHANDER JORRIN MELHEN and MICHEL ALEU caused the withdrawal of approximately \$1,149 from Miccosukee Gaming ATM no. CT105, in exchange for a false and fraudulent credit voucher number ending in 2829, which they caused to be inserted in that ATM.

All in violation of Title 18, United States Code, Section 371.

COUNTS 2-8

**Embezzlement of More Than \$1,000 from a Tribal Gaming Establishment
(18 U.S.C. § 1168(b))**

1. Paragraphs 1 to 7, 9, 11, and 13 of the General Allegations section of this Indictment are re-alleged and fully incorporated herein by reference.

2. On or about the dates specified below as to each defendant, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**MICHEL ALEU,
LESTER LAVIN,
YOHANDER JORRIN MELHEN,
a/k/a "Yohander Jorrin,"
a/k/a "Yohander J. Melhen," and
LEONARDO BETANCOURT,**

being employees and individual licensees of a gaming establishment operated by and for and licensed by an Indian tribe, that is Miccosukee Gaming, pursuant to an ordinance or resolution approved by the National Indian Gaming Commission, did embezzle, abstract, purloin, willfully misapply, and take and carry away with intent to steal, money, funds, assets, and other property of Miccosukee Gaming of a value in excess of \$1,000:

COUNT	APPROX. DATE	DEFENDANT(S)	ACT(S) OF EMBEZZLEMENT
2	5/4/2015	YOHANDER JORRIN MELHEN	Withdrawal of more than \$1,000 in cash from Miccosukee Gaming ATM no. CT102, in exchange for false and fraudulent credit vouchers inserted in that ATM, including voucher numbers ending in: 7887 for \$1,197; 6100 for \$1,148; 0107 for \$1,194.03; 3862 for \$1,191; and 9662 for \$1,191
3	5/5/2015	LEONARDO BETANCOURT	Withdrawal of more than \$1,000 in cash from Miccosukee Gaming ATM nos. CT102 and CT104, in exchange for false and fraudulent credit vouchers inserted in those ATMs, including voucher numbers ending in: 3141 for \$1,149.25; 0800 for \$1,195.17; 9338 for \$1,164.01; 9344 for \$1,194; and 6076 for \$1,147.10
4	5/6/2015	LESTER LAVIN and LEONARDO BETANCOURT	Withdrawal of more than \$1,000 in cash from Miccosukee Gaming ATM nos. CT105 and CT102, in exchange for false and fraudulent credit vouchers inserted in those ATMs, including voucher numbers ending in: 8978 for \$1,145.31; 2803 for \$1,194.40; 3279 for \$1,147; 3209 for \$1,195; 8029 for \$1,154.10; and 3009 for \$1,197.25

COUNT	APPROX. DATE	DEFENDANT(S)	ACT(S) OF EMBEZZLEMENT
5	5/6/2015	LESTER LAVIN and LEONARDO BETANCOURT	Withdrawal of more than \$1,000 in cash from Miccosukee Gaming ATM nos. CT102 and CT103, in exchange for false and fraudulent credit vouchers inserted in those ATMs, including voucher numbers ending in: 6720 for \$1,199.01; 4123 for \$1,154.25; 2241 for \$1,197; 3254 for \$1,194.05; 4748 for \$1,144.02; and 4426 for \$1,157.06
6	5/12/2015	YOHANDER JORRIN MELHEN	Withdrawal of more than \$1,000 in cash from Miccosukee Gaming ATM nos. CT102 and CT105, in exchange for false and fraudulent credit vouchers inserted in those ATMs, including voucher numbers ending in: 1027 for \$1,151.52; 0272 for \$1,197.05; 5962 for \$1,150.02; 4636 for \$1,197.05; and 8800 for \$1,197
7	5/27/2015	LESTER LAVIN	Withdrawal of more than \$1,000 in cash from Miccosukee Gaming ATM nos. CT103, CT101, and CT105, in exchange for false and fraudulent credit vouchers inserted in those ATMs, including voucher numbers ending in: 9357 for \$1,149.25; 0827 for \$1,199.55; 1815 for \$1,198; 0367 for \$1,196.80; 9048 for \$1,144; and 2116 for \$1,147

COUNT	APPROX. DATE	DEFENDANT(S)	ACT(S) OF EMBEZZLEMENT
8	5/27/2015	MICHEL ALEU and YOHANDER JORRIN MELHEN	Withdrawal of more than \$1,000 in cash from Miccosukee Gaming ATM nos. CT105 and CT102, in exchange for false and fraudulent credit vouchers inserted in those ATMs, including voucher numbers ending in: 2829 for \$1,149; 3245 for \$1,146; and 1529 for \$1,185.65

In violation of Title 18, United States Code, Sections 1168(b) and 2.

COUNT 9
Conspiracy to Commit Computer Fraud
(18 U.S.C. § 1030(b))

1. Paragraphs 1 to 7, 9, 11, and 13 of the General Allegations section of this Indictment are re-alleged and fully incorporated herein by reference.
2. The allegations in the Manner and Means section of Count 1 of this Indictment are re-alleged and fully incorporated herein by reference.
3. From on or about January 29, 2011, and continuing through on or about May 27, 2015, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

MICHEL ALEU,
LESTER LAVIN,
YOHANDER JORRIN MELHEN,
 a/k/a "Yohander Jorrin,"
 a/k/a "Yohander J. Melhen," and
LEONARDO BETANCOURT,

did knowingly and willfully combine, conspire, confederate, and agree with each other and with other persons known and unknown to the Grand Jury, to knowingly and with intent to defraud, access a protected computer without authorization, and exceed authorized access, and by means of such conduct further the intended fraud and obtain anything of value, in violation of Title 18,

United States Code, Section 1030(a)(4).

All in violation of Title 18, United States Code, Section 1030(b).

COUNTS 10-16
Computer Fraud
(18 U.S.C. § 1030(a)(4))

1. Paragraphs 1 to 7, 9, 11, and 13 of the General Allegations section of this Indictment are re-alleged and fully incorporated herein by reference.

2. On or about the dates specified below as to each defendant, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

MICHEL ALEU,
LESTER LAVIN,
YOHANDER JORRIN MELHEN,
 a/k/a "Yohander Jorrin,"
 a/k/a "Yohander J. Melhen," and
LEONARDO BETANCOURT,

did knowingly and with intent to defraud, access a protected computer without authorization, and exceed authorized access, and by means of such conduct further the intended fraud and obtain anything of value:

COUNT	APPROX. DATE	DEFENDANT(S)	ACCESS
10	5/4/2015	YOHANDER JORRIN MELHEN	Alteration of information on AGS EGM no. PT906-08, to record false and fraudulent "coin-in" amounts, and obtain false and fraudulent credit vouchers, including vouchers ending in: 7887 for \$1,197; 6100 for \$1,148; 0107 for \$1,194.03; 3862 for \$1,191; 9662 for \$1,191; and 2538 for \$499.75

COUNT	APPROX. DATE	DEFENDANT(S)	ACCESS
11	5/5/2015	LEONARDO BETANCOURT	Alteration of information on AGS EGM no. PT925-10, to record false and fraudulent "coin-in" amounts, and obtain false and fraudulent credit vouchers, including vouchers ending in: 3141 for \$1,149.25; 0800 for \$1,195.17; 9338 for \$1,164.01; 9344 for \$1,194; 6076 for \$1,147.10; and 7270 for \$1,202.02
12	5/6/2015	LESTER LAVIN and LEONARDO BETANCOURT	Alteration of information on AGS EGM no. PT910-09, to record false and fraudulent "coin-in" amounts, and obtain false and fraudulent credit vouchers, including voucher numbers ending in: 8978 for \$1,145.31; 3279 for \$1,147; 3209 for \$1,195; 8029 for \$1,154.10; 3009 for \$1,197.25; 2803 for \$1,194.40; and 3149 for \$520
13	5/6/2015	LESTER LAVIN and LEONARDO BETANCOURT	Alteration of information on AGS EGM no. PT920-17, to record false and fraudulent "coin-in" amounts, and obtain false and fraudulent credit vouchers, including voucher numbers ending in: 6720 for \$1,199.01; 4748 for \$1,144.02; 4426 for \$1,157.06; 4123 for \$1,154.25; 2241 for \$1,197; and 3254 for \$1,194.05
14	5/12/2015	YOHANDER JORRIN MELHEN	Alteration of information on AGS EGM no. PT913-13, to record false and fraudulent "coin-in" amounts, and obtain false and fraudulent credit vouchers, including voucher numbers ending in: 1027 for \$1,151.52; 0272 for \$1,197.05; 5962 for \$1,150.02; 4636 for \$1,197.05; and 8800 for \$1,197

COUNT	APPROX. DATE	DEFENDANT(S)	ACCESS
15	5/27/2015	LESTER LAVIN	Alteration of information on AGS EGM no. PT909-09, to record false and fraudulent "coin-in" amounts, and obtain false and fraudulent credit vouchers, including voucher numbers ending in: 9357 for \$1,149.25; 0827 for \$1,199.55; 1815 for \$1,198; 0367 for \$1,196.80; 9048 for \$1,144; and 2116 for \$1,147
16	5/27/2015	MICHEL ALEU and YOHANDER JORRIN MELHEN	Alteration of information on AGS EGM no. PT917-07, to record false and fraudulent "coin-in" amounts, and obtain false and fraudulent credit vouchers, including voucher numbers ending in: 2829 for \$1,149; 3245 for \$1,146; 1529 for \$1,185.65; and 1124 for \$1,185.65

In violation of Title 18, United States Code, Sections 1030(a)(4) and 2

COUNT 17
Conspiracy to Commit Money Laundering Offenses
(18 .S.C. § 1956(h))

1. Paragraphs 7, 8, and 15 to 17 of the General Allegations section of this Indictment are re-alleged and fully incorporated herein by reference.

2. From in or around January 2011, and continuing through in or around March 2016, in Miami-Dade, Palm Beach, and St. Lucie Counties, in the Southern District of Florida, and elsewhere, the defendants,

MICHEL ALEU and
MARIA DEL PILAR ALEU,
 a/k/a "Maria Aleu,"
 a/k/a "Maria D. Aleu,"

did knowingly and voluntarily combine, conspire, confederate, and agree with each other and with

other persons known and unknown to the Grand Jury, to commit certain offenses against the United States, in violation of Title 18, United States Code, Sections 1956 and 1957, that is:

(a) to knowingly conduct a financial transaction affecting interstate and foreign commerce, and involving the use of a financial institution the activities of which affected interstate and 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 financial transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i);

(b) to knowingly conduct a financial transaction affecting interstate and foreign commerce, and involving the use of a financial institution the activities of which affected interstate and 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 financial transaction was designed in whole and in part to avoid a transaction reporting requirement under State and Federal law, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii); and

(c) to knowingly engage in a monetary transaction affecting interstate commerce, by, through, and to a financial institution, in criminally derived property having a value of more than \$10,000, such property having been derived from a specified unlawful activity, and knowing that the property involved in the monetary transaction represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1957.

It is further alleged that the specified unlawful activity is computer fraud, in violation of

Title 18, United States Code, Sections 1030(a)(4) and 2.

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

COUNT 18
Conspiracy to Commit Money Laundering Offenses
(18 .S.C. § 1956(h))

1. Paragraphs 9, 10, and 15 to 17 of the General Allegations section of this Indictment are re-alleged and fully incorporated herein by reference.

2. From in or around January 2011, and continuing through in or around July 2016, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

LESTER LAVIN and
ANISLEYDI VERGEL HERMIDA,
a/k/a "Anisleydi Vergel,"

did knowingly and voluntarily combine, conspire, confederate, and agree with each other and with other persons known and unknown to the Grand Jury, to commit certain offenses against the United States, in violation of Title 18, United States Code, Sections 1956 and 1957, that is:

(a) to knowingly conduct a financial transaction affecting interstate and foreign commerce, and involving the use of a financial institution the activities of which affected interstate and 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 financial transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i);

(b) to knowingly conduct a financial transaction affecting interstate and foreign commerce, and involving the use of a financial institution the activities of which affected interstate

and 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 financial transaction was designed in whole and in part to avoid a transaction reporting requirement under State and Federal law, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii); and

(c) to knowingly engage in a monetary transaction affecting interstate commerce, by, through, and to a financial institution, in criminally derived property having a value of more than \$10,000, such property having been derived from a specified unlawful activity, and knowing that the property involved in the monetary transaction represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1957.

It is further alleged that the specified unlawful activity is computer fraud, in violation of Title 18, United States Code, Sections 1030(a)(4) and 2.

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

COUNT 19
Conspiracy to Commit Money Laundering Offenses
(18 U.S.C. § 1956(b))

1. Paragraphs 11, 12, and 15 to 17 of the General Allegations section of this Indictment are re-alleged and fully incorporated herein by reference.

2. From in or around January 2011, and continuing through in or around October 2018, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

YOHANDER JORRIN MELHEN,
a/k/a "Yohander Jorrin,"
a/k/a "Yohander J. Melhen," and
MILAGROS MARILE ACOSTA TORRES,
a/k/a "Milagros Marileisis Acosta Torres,"
a/k/a "Milagros M. Acosta Torres,"
a/k/a "Milagros M. Acosta,"
a/k/a "Milagros M. Torres,"

did knowingly and voluntarily combine, conspire, confederate, and agree with each other and with other persons known and unknown to the Grand Jury, to commit certain offenses against the United States, in violation of Title 18, United States Code, Sections 1956 and 1957, that is:

(a) to knowingly conduct a financial transaction affecting interstate and foreign commerce, and involving the use of a financial institution the activities of which affected interstate and 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 financial transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i);

(b) to knowingly conduct a financial transaction affecting interstate and foreign commerce, and involving the use of a financial institution the activities of which affected interstate and 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 financial transaction was designed in whole and in part to avoid a transaction reporting requirement under State and Federal law, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii); and

(c) to knowingly engage in a monetary transaction affecting interstate commerce, by, through, and to a financial institution, in criminally derived property having a value of more than \$10,000, such property having been derived from a specified unlawful activity, and knowing that the property involved in the monetary transaction represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1957.

It is further alleged that the specified unlawful activity is computer fraud, in violation of Title 18, United States Code, Sections 1030(a)(4) and 2.

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

COUNT 20
Conspiracy to Commit Money Laundering Offenses
(18 U.S.C. § 1956(h))

1. Paragraphs 13 to 17 of the General Allegations section of this Indictment are re-alleged and fully incorporated herein by reference.

2. From in or around January 2011, and continuing through in or around October 2018, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

LEONARDO BETANCOURT and
YUSMARY SHIRLEY DURAN,
a/k/a "Yusmary S. Duran Mejia,"

did knowingly and voluntarily combine, conspire, confederate, and agree with each other and with other persons known and unknown to the Grand Jury, to commit certain offenses against the United States, in violation of Title 18, United States Code, Sections 1956 and 1957, that is:

(a) to knowingly conduct a financial transaction affecting interstate and foreign commerce, and involving the use of a financial institution the activities of which affected interstate and 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 financial transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i);

(b) to knowingly conduct a financial transaction affecting interstate and foreign

commerce, and involving the use of a financial institution the activities of which affected interstate and 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 financial transaction was designed in whole and in part to avoid a transaction reporting requirement under State and Federal law, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii); and

(c) to knowingly engage in a monetary transaction affecting interstate commerce, by, through, and to a financial institution, in criminally derived property having a value of more than \$10,000, such property having been derived from a specified unlawful activity, and knowing that the property involved in the monetary transaction represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1957.

It is further alleged that the specified unlawful activity is computer fraud, in violation of Title 18, United States Code, Sections 1030(a)(4) and 2.

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

COUNTS 21-48
Money Laundering
(18 U.S.C. § 1956(a)(1)(B)(i) and (ii))

1. Paragraphs 7 to 17 of the General Allegations section of this Indictment are re-alleged and fully incorporated herein by reference.

2. On or about the dates specified below as to each defendant, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

MICHEL ALEU,
MARIA DEL PILAR ALEU,
a/k/a "Maria Aleu,"
a/k/a "Maria D. Aleu,"
LESTER LAVIN,
ANISLEYDI VERGEL HERMIDA,

a/k/a "Anisleydi Vergel,"
YOHANDER JORRIN MELHEN,
a/k/a "Yohander Jorrin,"
a/k/a "Yohander J. Melhen,"
MILAGROS MARILE ACOSTA TORRES,
a/k/a "Milagros Marileisis Acosta Torres,"
a/k/a "Milagros M. Acosta Torres,"
a/k/a "Milagros M. Acosta,"
a/k/a "Milagros M. Torres,"
LEONARDO BETANCOURT, and
YUSMARY SHIRLEY DURAN,
a/k/a "Yusmary S. Duran Mejia,"

did knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, and involving the use of a financial institution the activities of which affected interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and to avoid a transaction reporting requirement under State and Federal law, and as more particularly described in each count below:

MICHEL ALEU and MARIA DEL PILAR ALEU COUNTS

COUNT	APPROX. DATE	DEFENDANT(S)	FINANCIAL TRANSACTION
21	5/21/2015	MICHEL ALEU and MARIA DEL PILAR ALEU	Deposit of approximately \$9,000 in cash in Chase Bank account ending in 3733, in Miami-Dade County
22	5/26/2015	MICHEL ALEU and MARIA DEL PILAR ALEU	Deposit of approximately \$8,000 in cash in Chase Bank account ending in 3733, in Miami-Dade County

COUNT	APPROX. DATE	DEFENDANT(S)	FINANCIAL TRANSACTION
23	5/26/2015	MICHEL ALEU and MARIA DEL PILAR ALEU	Negotiation of check no. 1470, in the amount of approximately \$22,300, payable to Shores Development, Inc. Escrow, drawn on Chase Bank account ending in 3733, in Miami-Dade County, for the escrow deposit for the purchase of real property located at 13104 S.W. 211th Terrace, Miami, Florida 33177
24	1/20/2016	MICHEL ALEU and MARIA DEL PILAR ALEU	Deposit of Chase Bank cashier's check no. 1032410983, for \$8,000, payable to Maria D. Aleu, and Chase Bank cashier's check no. 1032410984, for \$7,000, payable to Maria D. Aleu, in Bank of America account ending in 9583, in Miami-Dade County
25	1/25/2016	MICHEL ALEU and MARIA DEL PILAR ALEU	Deposit of Palm Beach R.V., Inc.'s check no. 022497, in the amount of approximately \$49,000, payable to MARIA DEL PILAR ALEU, proceeds from the sale of a Heartland Cyclone 4200 trailer with VIN ending in 2559, in Bank of America account ending in 9583, in Miami-Dade County
26	3/24/2016	MICHEL ALEU and MARIA DEL PILAR ALEU	Wire-transfer of approximately \$95,844.40 from Bank of America account ending in 9583, in Miami-Dade County, to Title Services of Dade County, Inc.'s U.S. Century Bank account ending in 3781, in Miami-Dade County, for the cash-to-close for the purchase of real property located at 13104 S.W. 211th Terrace, Miami, Florida 33177

LESTER LAVIN and ANISLEYDI VERGEL HERMIDA COUNTS

COUNT	APPROX. DATE	DEFENDANT(S)	FINANCIAL TRANSACTION
27	9/16/2014	LESTER LAVIN and ANISLEYDI VERGEL HERMIDA	Deposit of approximately \$9,000 in cash in Bank of America account ending in 6471, in Miami-Dade County
28	11/17/2014	LESTER LAVIN	Withdrawal of approximately \$5,779.42 from Chase Bank account ending in 3760, in Miami-Dade County; and purchase of Chase Bank cashier's check no. 1649510863, in the amount of approximately \$5,779.42, payable to Florida Prepaid College Plan, for Florida Prepaid College plan no. 1115378443
29	12/4/2014	LESTER LAVIN	Transfer of approximately \$27,278.94 from Chase Bank account ending in 7475, in Miami-Dade County, to Florida Prepaid College Board, for Florida Prepaid College plan no. 9100062307
30	12/26/2014	LESTER LAVIN	Deposit of approximately \$9,000 in cash in Chase Bank account ending in 3760, in Miami-Dade County.
31	12/26/2014	LESTER LAVIN and ANISLEYDI VERGEL HERMIDA	Deposit of approximately \$9,000 in cash in Bank of America account ending in 6471, in Miami-Dade County
32	12/30/2014	LESTER LAVIN	Transfer of approximately \$9,000, from Bank of America account ending in 6471, in Miami-Dade County, to Dade County Federal Credit Union account ending in 4215
33	12/30/2014	LESTER LAVIN	Transfer of approximately \$9,000, from Chase Bank account ending in 3760, in Miami-Dade County, to Dade County Federal Credit Union account ending in 4215

COUNT	APPROX. DATE	DEFENDANT(S)	FINANCIAL TRANSACTION
34	3/17/2015	LESTER LAVIN and ANISLEYDI VERGEL HERMIDA	Deposit of approximately \$9,000 in cash in Wells Fargo Bank account ending in 2138, in Miami-Dade County
35	4/21/2015	LESTER LAVIN and ANISLEYDI VERGEL HERMIDA	Deposit of approximately \$8,000 in cash in Wells Fargo Bank account ending in 2138, in Miami-Dade County
36	5/26/2015	LESTER LAVIN and ANISLEYDI VERGEL HERMIDA	Deposit of approximately \$9,000 in cash in Wells Fargo Bank account ending in 2138, in Miami-Dade Count
37	6/1/2015	LESTER LAVIN	Withdrawal of approximately \$4,440.57 in cash from Chase Bank account ending in 7475, in Miami-Dade County, for the purchase of Chase Bank cashier checks numbered 1173417328, 1173417329, and 1173417330, all payable to La Rive Gauche Condo Association
38	6/1/2015	LESTER LAVIN and ANISLEYDI VERGEL HERMIDA	Withdrawal of approximately \$44,006.42 from Wells Fargo Bank account ending in 2138, in Miami-Dade County
39	6/1/2015	LESTER LAVIN and ANISLEYDI VERGEL HERMIDA	Deposit of approximately \$44,006.42 in Wells Fargo Bank account ending in 3934, in Miami-Dade County
40	8/11/2015	LESTER LAVIN and ANISLEYDI VERGEL HERMIDA	Deposit of approximately \$8,000 in Wells Fargo Bank account ending in 3934, in Miami-Dade County.
41	9/24/2015	LESTER LAVIN and ANISLEYDI VERGEL HERMIDA	Deposit of approximately \$8,500 in Wells Fargo Bank account ending in 3934, in Miami-Dade County

**YOHANDER JORRIN MELHEN and
MILAGROS MARILE ACOSTA TORRES COUNTS**

COUNT	APPROX. DATE	DEFENDANT(S)	FINANCIAL TRANSACTION
42	3/31/2015	YOHANDER JORRIN MELHEN and MILAGROS MARILE ACOSTA TORRES	Withdrawal of approximately \$27,250.34 from Chase Bank account ending in 3952, in Miami-Dade County, for the purchase of Chase Bank cashier's check no. 1173012831 in the amount of approximately \$27,250.34, payable to Florida Prepaid College Board, for Florida Prepaid College plan no. 9100072223
43	5/3/2015	YOHANDER JORRIN MELHEN and MILAGROS MARILE ACOSTA TORRES	Payment of approximately \$19,000 in cash to Lorenzo Bomnin Chevrolet, in Miami-Dade County, as partial payment for a Chevrolet Tahoe truck with VIN ending in 7642
44	1/25/2016	YOHANDER JORRIN MELHEN and MILAGROS MARILE ACOSTA TORRES	Deposit of Carmax check no. 7110099807, in the amount of approximately \$31,091.39, payable to Milagros Marile Acosta Torres, proceeds from the sale of a Chevy Tahoe truck with VIN ending in 7642, in Chase Bank account ending in 3952, in Miami-Dade County
45	3/5/2016	YOHANDER JORRIN MELHEN and MILAGROS MARILE ACOSTA TORRES	Negotiation of check no. 196, in the amount of approximately \$12,950, payable to Off Lease Only, Inc., drawn on Chase Bank account ending in 3952, in Miami-Dade County, as payment for a Toyota Avalon automobile, with VIN ending in 4218

COUNT	APPROX. DATE	DEFENDANT(S)	FINANCIAL TRANSACTION
46	10/8/2018	YOHANDER JORRIN MELHEN and MILAGROS MARILE ACOSTA TORRES	Deposit of Carmax check no. 7110124178, in the amount of \$13,000, payable to Milagros Marile Acosta Torres, proceeds from the sale of a Toyota Avalon automobile with VIN ending in 4218, in Chase Bank account ending in 3952, in Miami-Dade County
47	10/15/2018	YOHANDER JORRIN MELHEN and MILAGROS MARILE ACOSTA TORRES	Withdrawal of approximately \$14,500 from Chase Bank account ending in 3952, in Miami-Dade County, for the purchase of Chase Bank cashier's check no. 1173020046 for \$14,500, payable to "John Doe," as partial payment for a Ford F-150 truck with VIN ending in 2044

LEONARDO BETANCOURT and YUSMARY SHIRLEY DURAN COUNT

COUNT	APPROX. DATE	DEFENDANT(S)	FINANCIAL TRANSACTION
48	4/11/2016	LEONARDO BETANCOURT, and YUSMARY SHIRLEY DURAN	Transfer of approximately \$28,737.80 from BB&T account ending in 1989, in Miami-Dade County, to Florida Prepaid College Savings Plans, for Florida Prepaid College plan no. 9100776633

It is further alleged that the specified unlawful activity is computer fraud, in violation of Title 18, United States Code, Sections 1030(a)(4) and 2.

In violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and (ii), and 2.

COUNTS 49-62
Money Laundering
(18 U.S.C. § 1957)

1. Paragraphs 7 to 17 of the General Allegations section of this Indictment are re-alleged and fully incorporated herein by reference.

2. On or about the dates specified below as to each defendant, in Miami-Dade, Palm Beach, and St. Lucie Counties, in the Southern District of Florida, and elsewhere, the defendants,

MICHEL ALEU,
MARIA DEL PILAR ALEU,
 a/k/a "Maria Aleu,"
 a/k/a "Maria D. Aleu,"
LESTER LAVIN,
ANISLEYDI VERGEL HERMIDA,
 a/k/a "Anisleydi Vergel,"
YOHANDER JORRIN MELHEN,
 a/k/a "Yohander Jorrin,"
 a/k/a "Yohander J. Melhen,"
MILAGROS MARILE ACOSTA TORRES,
 a/k/a "Milagros Marileisis Acosta Torres,"
 a/k/a "Milagros M. Acosta Torres,"
 a/k/a "Milagros M. Acosta,"
 a/k/a "Milagros M. Torres,"
LEONARDO BETANCOURT, and
YUSMARY SHIRLEY DURAN,
 a/k/a "Yusmary S. Duran Mejia,"

did knowingly engage in and attempt to engage in monetary transactions affecting interstate commerce, by, through, and to a financial institution, in criminally derived property having a value of more than \$10,000, such property having been derived from a specified unlawful activity, and knowing that the property involved in the monetary transactions represented the proceeds of some form of unlawful activity, as more particularly described in each count below:

MICHEL ALEU and MARIA DEL PILAR ALEU COUNTS

COUNT	APPROX. DATE	DEFENDANT(S)	MONETARY TRANSACTION
49	7/17/2014	MICHEL ALEU and MARIA DEL PILAR ALEU	Payment of approximately \$41,700 in cash to La Mesa RV Center, Inc., in St. Lucie County, for the purchase of a Heartland Elkridge 38RSRT trailer, with VIN ending in 8804

COUNT	APPROX. DATE	DEFENDANT(S)	MONETARY TRANSACTION
50	2/7/2015	MICHEL ALEU and MARIA DEL PILAR ALEU	Payment of approximately \$51,259 in cash to La Mesa RV Center, Inc., in Palm Beach County, for the purchase of a Heartland Cyclone 4200 trailer, with VIN ending in 2559
51	5/26/2015	MICHEL ALEU and MARIA DEL PILAR ALEU	Negotiation of check no. 1470, in the amount of approximately \$22,300, payable to Shores Development, Inc. Escrow, drawn on Chase Bank account ending in 3733, in Miami-Dade County, for the escrow deposit for the purchase of real property located at 13104 S.W. 211th Terrace, Miami, Florida 33177
52	3/24/2016	MICHEL ALEU and MARIA DEL PILAR ALEU	Wire-transfer of approximately \$95,844.40 from Bank of America account ending in 9583, in Miami-Dade County, to Title Services of Dade County, Inc.'s U.S. Century Bank account ending in 3781, in Miami-Dade County, for the cash-to-close for the purchase of real property located at 13104 S.W. 211th Terrace, Miami, Florida 33177

LESTER LAVIN and ANISLEYDI VERGEL HERMIDA COUNTS

COUNT	APPROX. DATE	DEFENDANT(S)	MONETARY TRANSACTION
53	12/4/2014	LESTER LAVIN	Transfer of approximately \$27,278.94 from Chase Bank account ending in 7475, in Miami-Dade County, to Florida Prepaid College, for Florida Prepaid College plan no. 9100062307
54	6/1/2015	LESTER LAVIN and ANISLEYDI VERGEL HERMIDA	Withdrawal of approximately \$44,006.42 from Wells Fargo Bank account ending in 2138, in Miami-Dade County

COUNT	APPROX. DATE	DEFENDANT(S)	MONETARY TRANSACTION
55	6/1/2015	LESTER LAVIN and ANISLEYDI VERGEL HERMIDA	Deposit of approximately \$44,006.42 in Wells Fargo Bank account ending in 3934, in Miami-Dade County

**YOHANDER JORRIN MELHEN and
MILAGROS MARILE ACOSTA TORRES COUNTS**

COUNT	APPROX. DATE	DEFENDANT(S)	MONETARY TRANSACTION
56	3/31/2015	YOHANDER JORRIN MELHEN and MILAGROS MARILE ACOSTA TORRES	Withdrawal of approximately \$27,250.34 from Chase Bank account ending in 3952, in Miami-Dade County, for the purchase of Chase Bank cashier's check no. 1173012831, in the amount of approximately \$27,250.34, payable to Florida Prepaid College Board, for Florida Prepaid College plan no. 9100072223
57	5/3/2015	YOHANDER JORRIN MELHEN and MILAGROS MARILE ACOSTA TORRES	Payment of approximately \$19,000 in cash to Lorenzo Bomnin Chevrolet, in Miami-Dade County, as partial payment for a Chevrolet Tahoe truck, with VIN ending in 7642
58	1/25/2016	YOHANDER JORRIN MELHEN and MILAGROS MARILE ACOSTA TORRES	Deposit of Carmax check no. 7110099807, in the amount of approximately \$31,091.39, payable to Milagros Marile Acosta Torres, proceeds from the sale of a 2015 Chevy Tahoe truck with VIN ending in 7642, in Chase Bank account ending in 3952, in Miami-Dade County

COUNT	APPROX. DATE	DEFENDANT(S)	MONETARY TRANSACTION
59	3/5/2016	YOHANDER JORRIN MELHEN and MILAGROS MARILE ACOSTA TORRES	Negotiation of check no. 196, in the amount of approximately \$12,950, payable to Off Lease Only, Inc., drawn on Chase Bank account ending in 3952, in Miami-Dade County, as payment for a Toyota Avalon automobile, with VIN ending in 4218
60	10/8/2018	YOHANDER JORRIN MELHEN and MILAGROS MARILE ACOSTA TORRES	Deposit of Carmax check no. 7110124178, in the amount of approximately \$13,000, payable to Milagros Marile Acosta Torres, proceeds from the sale of a Toyota Avalon automobile with VIN ending in 4218, in Chase Bank account ending in 3952, in Miami-Dade County.
61	10/15/2018	YOHANDER JORRIN MELHEN and MILAGROS MARILE ACOSTA TORRES	Withdrawal of approximately \$14,500 from Chase Bank account ending in 3952, in Miami-Dade County, for the purchase of Chase Bank cashier's check no. 1173020046 for \$14,500, payable to "John Doe," as partial payment for a Ford F-150 truck, with VIN ending in 2044.

LEONARDO BETANCOURT and YUSMARY SHIRLEY DURAN COUNT

COUNT	APPROX. DATE	DEFENDANT(S)	FINANCIAL TRANSACTION
62	4/11/2016	LEONARDO BETANCOURT and YUSMARY SHIRLEY DURAN	Transfer of approximately \$28,737.80 from BB&T account ending in 1989, in Miami-Dade County, to Florida Prepaid College Savings Plans, for Florida Prepaid College plan no. 9100776633

It is further alleged that the specified unlawful activity is computer fraud, in violation of Title 18, United States Code, Sections 1030(a)(4) and 2.

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In violation of Title 18, United States Code, Sections 1957 and 2.

COUNT 63
False and Fraudulent Statement
(18 U.S.C. § 1001(a)(2))

On or about March 21, 2019, in Miami-Dade County, in the Southern District of Florida,
the defendant,

MARIA DEL PILAR ALEU,
a/k/a "Maria Aleu,"
a/k/a "Maria D. Aleu,"

did willfully and knowingly make a false, fictitious, and fraudulent statement and representation as to a material fact, in that the defendant represented to a Special Agent of the Federal Bureau of Investigation that hundreds of thousands of dollars in cash that she deposited in bank accounts and used to purchase vehicles was received from boarders and tenants, when in truth and in fact, and as the defendant then and well knew, the cash was not received from boarders and tenants.

In violation of Title 18, United States Code, Section 1001(a)(2).

FORFEITURE
(18 U.S.C. § 982(a)(1) and (2)(B), and § 1028(i))

1. The allegations of this Indictment are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of certain property in which each of the defendants, MICHEL ALEU, MARIA DEL PILAR ALEU, a/k/a "Maria Aleu," a/k/a "Maria D. Aleu," LESTER LAVIN, ANISLEYDI VERGEL HERMIDA, a/k/a "Anisleydi Vergel," YOHANDER JORRIN MELHEN, a/k/a "Yohander Jorrin," a/k/a "Yohander J. Melhen," MILAGROS MARILE ACOSTA TORRES, a/k/a "Milagros Marileisis Acosta Torres," a/k/a "Milagros M. Acosta Torres," a/k/a "Milagros M. Acosta," a/k/a "Milagros M. Torres," LEONARDO BETANCOURT, and YUSMARY SHIRLEY DURAN, a/k/a "Yusmary S. Duran Mejia," have an interest including:

2. Upon a conviction of Title 18, United States Code Section 1030, as alleged in this Indictment, the defendants so convicted shall forfeit to the United States any property constituting, or derived from, proceeds the person obtained directly or indirectly, as the result of such violation, pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1030(i)(1)(B), and any personal property that was used or intended to be used to commit or to facilitate the commission of such violation, pursuant to Title 18, United States Code, Section 1030(i)(1)(A).

3. Upon conviction of a violation of Title 18, United States Code, Sections 1956 or 1957, as alleged in this Indictment, the defendants so convicted shall forfeit to the United States any 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).

4. The property subject to forfeiture includes, but is not limited to, the following:

- a. A forfeiture money judgment of at least \$5 million;
- b. Real property located at 13104 S.W. 211th Terrace, Miami, Florida 33177;
- c. Real Property located at 5880 Collins Avenue, Unit 1203, Miami Beach, Florida 33140;
- d. Real property located at 6120 S.W. 12th Street, West Miami, Florida 33144;
- e. Real property located at 110 Fontainebleau Boulevard, Unit 404, Miami, Florida 33172;
- f. Real property located at 14247 S.W. 165th Street, Miami, Florida 33177;
- g. Real property located at 15411 S.W. 143rd Avenue, Miami, Florida 33177;
- h. Florida Prepaid College Plan No. 1115378443, in the name of Lester Lavin;
- i. Florida Prepaid College Plan No. 9100062307, in the name of Lester Lavin;
- j. Florida Prepaid College Plan No. 9100072223, in the name of Milagros M. Acosta Torres;
- k. Florida Prepaid College Plan No. 9100776633, in the name of Yusmary Duran;

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1. Chevrolet Suburban SUV with vehicle identification number ending in 4516; and

m. Ford F-150 truck with vehicle identification number ending in 2044.

5. If any of the property described above, as a result of any act or omission of any of the defendants:

- 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 of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

All pursuant to Title 18, United States Code, Sections 982(a)(1) and (a)(2)(B) and 1030(i)(1)(A) and (B), and the procedures set forth in Title 21, United States Code, Section 853, as incorporated by Title 18, United States Code, Sections 982(b)(1) and 1030(i)(2).

A TRUE BILL

FOREPERSON



ARIANA FAJARDO ORSHAN
UNITED STATES ATTORNEY



DWAYNE EDWARD WILLIAMS
ASSISTANT UNITED STATES ATTORNEY

Exhibit C

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 19-20435-CR-GAYLES

UNITED STATES OF AMERICA,
Plaintiff,

CHANGE OF PLEA MINUTES AND
DEFENDANT'S WAIVER TO APPEAR
BEFORE U.S. DISTRICT JUDGE

vs.

MILAGROS MARILE ACOSTA TORRES,
Defendant.

On Jan. 31, 2020 the above-named defendant appeared in person before the Honorable ALICIA M. OTAZO-REYES, United States Magistrate Judge, with counsel Alfredo Izaguirre (ret) and said defendant stated in open court that he desired to withdraw his/her plea of not guilty heretofore entered and desired to enter a plea of guilty to Count(s) 19 of the Indictment/Information. After the defendant was duly sworn, the Court made inquiry as to guilt. The Court, being satisfied there was a factual basis for the plea, accepted the plea of guilty and found the defendant guilty as charged.

Whereupon:

- Defendant waived his/her right to appear before an Article III U.S. District Court Judge and consented to appear before a U.S. Magistrate Judge.
- The Court shall recommend to the U.S. District Court Judge that the defendant's plea shall be accepted.
- The Court proceeded to pronounce sentence.
- The Court postponed sentencing.
- The defendant was allowed to remain on present bond until Sentencing. 100k 1000
- The defendant remains in custody.
- The defendant was remanded to the custody of the U.S. Marshal awaiting sentencing.

Alicia M. Otazo-Reyes
ALICIA M. OTAZO-REYES
UNITED STATES MAGISTRATE JUDGE

TIME IN COURT: 35 min
LANGUAGE Spanish
CRD Stephanie A. Lee
COURT REPORTER Ileana Lopez (Swamy)

Defense Counsel's Signature [Signature]
 DEFENDANT'S Signature [Signature]
 AUSA'S signature [Signature]
Dwayne Williams

Exhibit D

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO.: 19-20435-CR-GAYLES/OTAZO-REYES

UNITED STATES OF AMERICA

vs.

**MILAGROS MARILE ACOSTA TORRES,
a/k/a "Milagros Marileisis Acosta Torres,"
a/k/a "Milagros M. Acosta Torres,"
a/k/a "Milagros M. Acosta,"
a/k/a "Milagros M. Torres,"**

Defendant.

STIPULATED FACTUAL PROFFER

The United States of America and MILAGROS MIRALE ACOSTA TORRES (hereinafter referred to as the "defendant" or "Acosta"), hereby agree that, if this case were to go to trial, the United States would establish the following facts beyond a reasonable doubt:

1. The facts alleged in paragraphs 11, 12, and 15 to 17 of the General Allegations section of the Indictment; the facts alleged in of the Manner and Means section of Count 1 of the Indictment; and the elements of the conspiracy to commit money laundering offenses, and the objects of the conspiracy, alleged in paragraph 2 of Count 19 of the Indictment.
2. At all material times, the defendant resided with her co-defendant, Yohander Jorin Melhen ("Jorin"), and their minor children born in 2005 and 2013, at addresses in Miami-Dade County, Florida.
3. From May 17, 2007, through May 28, 2015, Yohander Jorin Melhen ("Jorin") was an employee and licensee of Miccosukee Gaming. Jorin was employed as a Video

Technician and he serviced EGMs at the Miccosukee Casino.

4. Beginning as early as January 29, 2011, and continuing through May 27, 2015, Jorin, his fellow Miccosukee Gaming employees and licensees, Michel Aleu ("Aleu"), Lester Lavin ("Lavin"), and Leonardo Betancourt ("Betancourt") conspired to commit computer fraud, in violation of Title 18, United States Code, Section 1030(a)(4), and theft of more than \$1,000 from a tribal gaming establishment, in violation of Title 18, United States Code, Section 1168(b). In furtherance of these conspiracies, Jorin, Betancourt, Lavin, and Aleu used wires attached to points within certain EGMs to cause those EGMs to generate and record false and fraudulent "coin-in" amounts totaling thousands of dollars. Jorin, Betancourt, Lavin, and Aleu then caused the EGMs to generate false and fraudulent credit vouchers for "coin in" amounts, and presented the vouchers to Miccosukee Gaming, in exchange for cash. The cash that Jorin, Betancourt, Lavin, and Aleu obtained from the redemption of the credit vouchers was the proceeds of computer fraud, in violation of Title 18, United States Code, Section 1030(a)(4).

5. Beginning as early as January 2011, and continuing through in or around October 2018, the defendant and Yohander Jorin Melhen conspired to engage in various financial transactions involving the proceeds of computer fraud (hereinafter "proceeds"), for the purpose of concealing and disguising the nature, location, source, ownership, and control of the proceeds, and to avoid transaction reporting requirements imposed by federal and state law. Further, they conspired to engage in monetary transactions involving more than \$10,000 of proceeds. The defendant knew that the funds involved in these transactions were the proceeds of some form of unlawful activity. Indeed, the defendant knew the funds were stolen from Miccosukee Gaming. Pursuant to their agreement, the defendant and Jorin laundered at least \$147,970 in proceeds of

computer fraud.

Money Laundering Transactions in Furtherance of the Conspiracy

Deposits to the Defendant's Bank Accounts

6. On or about July 11, 2011, the defendant visited the Cutler Ridge branch of JPMorgan Bank, where she opened two accounts with herself as the sole signatory: savings account ending in 0583 ("account no. 0583") and checking account number ending in 3952 ("account no. 3952"). The defendant opened these accounts for the purpose of laundering the cash proceeds of computer fraud that Jorin brought home from the Miccosukee Casino.

7. Beginning in 2011 and continuing through 2014, the defendant knowingly deposited at least \$39,863 in cash proceeds in account no. 0583, and at least \$16,830 in cash proceeds in account no. 3952. The defendant received the cash from Jorin, and she understood that the cash was the proceeds of some form of unlawful activity. The defendant deposited the cash proceeds in account numbers 0583 and 3952 to conceal and disguise the nature, location, source, ownership, and control of the proceeds. Moreover, the defendant intentionally structured some of her deposits of cash proceeds to avoid transaction reporting requirements imposed by federal or state law. In particular, the defendant structured the cash deposits so that they did not exceed \$10,000 deposited in the same account, on the same day. Details of the structured deposits are as follows:

Date of Deposit	Chase Account No. 0583	Chase Account No. 3952
7/11/2011	\$5,000	
11/14/2011	\$5,000	\$8,000
3/26/2012	\$4,000	\$4,000
6/12/2012	\$7,000	
7/27/2012	\$7,000	
9/4/2012	\$8,000	

8. The defendant and Jorin conspired with Michel Aleu to launder proceeds of computer fraud. On or about April 16, 2012, Aleu withdrew \$18,000 of proceeds from his Bank of America account number ending in 2019, and used the proceeds to purchase Bank of America cashier's checks numbers 8506205 and 8506206, each in the amount of \$9,000, and payable to "Milagros Marileisis Acosta Torres." Aleu then delivered the cashier's checks to Jorin or the defendant. On April 16, 2014, the defendant deposited one of the cashier's checks in account no. 0583, and the other in account no. 3952. The defendant knew that the cashier's checks were the proceeds of some form of unlawful activity, and she intentionally deposited them in different accounts to avoid a transaction reporting requirement imposed by federal or state law.

9. On or about August 22, 2011, the defendant visited the Quail Roost branch of Bank of America, where she opened two accounts in her name, in trust for Yohander Jorin Melhen, with herself as the sole signatory: savings account ending in 5428 ("account no. 5428") and checking account number ending in 7436 ("account no. 7436"). The defendant opened these accounts for the purpose of laundering the cash proceeds of computer fraud that Jorin brought home from the Miccosukee Casino.

10. Beginning in 2011 and continuing through 2012, the defendant knowingly deposited at least \$35,000 in cash proceeds in account no. 5428. The defendant received the cash from Jorin, and she understood that the cash was the proceeds of some form of unlawful activity. The defendant deposited the cash proceeds in account no. 5428 to conceal and disguise the nature, location, source, ownership, and control of the proceeds. Moreover, the defendant intentionally structured some of her deposits of cash proceeds to avoid transaction reporting requirements imposed by federal or state law. In particular, the defendant structured the cash deposits so that

they did not exceed \$10,000 deposited in the same account, on the same day. Details of the structured deposits are as follows:

Date of Deposit	Bank of Account No. 5428
8/22/2011	\$5,000
3/26/2012	\$8,000
5/16/2012	\$7,000
7/5/2012	\$8,000
9/4/2012	\$7,000

Yohander Jorrin's Purchase of 14247 S.W. 165th Street

11. On or about July 25, 2012, Yohander Jorrin Melhen entered into a Residential Contract for Sale and Purchase regarding 14247 S.W. 165th Street, Miami. Pursuant to the contract, the purchase price for the property was \$230,000, and Jorrin was required to pay an earnest money deposit of \$10,000 to the settlement/escrow agent All World Title Corp.

12. On August 2, 2012, the defendant transferred \$10,000 of proceeds from Bank of America account no. 5428 to account no. 7436.

13. On or about August 2, 2012, the defendant wrote check no. 227, on account no. 7436, in the amount of \$10,000 payable to All World Title Corp., as the earnest money deposit for Jorrin's purchase of 14247 S.W. 165th Street. All World Title Corp. deposited check no. 227 in its Regions Bank escrow account on or about August 6, 2012.

14. On October 5, 2012, the defendant and Jorrin visited the Cutler Ridge Branch of JPMorgan Chase Bank, where they signed documentation adding Jorrin as a signatory to Chase account numbers 0583 and 3952. That same day, the couple visited the Quail Roost branch of Bank of America, where they signed documentation adding Jorrin as a signatory to Bank of America account numbers 5428 and 7436. The defendant and Jorrin added Jorrin to these bank accounts, only so that Jorrin would be seen as having paid the cash-to-close his purchase of 14247

S.W. 165th Street.

15. On October 22, 2012, Jorin visited a Chase branch in Miami-Dade County, where he withdrew \$47,464 in proceeds from account no. 0583. Jorin used the proceeds to purchase Chase cashier's check no. 1173808415 in the amount of \$47,464, payable to All World Title.

16. On or about October 22, 2012, Jorin closed his purchase of 14247 S.W. 165th Street. At that time, Jorin delivered Chase cashier's check no. 1173808415 to All World Title Corp. to pay the cash-to-close his purchase of the property.

17. In November 2012, following Jorin's purchase of 14247 S.W. 165th Street, the defendant and Jorin promptly removed Jorin as a signatory from Chase account numbers 0583 and 3952, and Bank of America account numbers 5428 and 7436. They removed Jorin as a signatory to conceal and disguise the nature, location, source, ownership, and control of the proceeds in those accounts.

The Purchase of Florida Prepaid College Plan No. 9100072223

18. On March 31, 2015, the defendant visited a Chase branch in Miami-Dade County, where she knowingly withdrew \$27,250.34 in proceeds from Chase account no. 3952. The defendant knowingly used the proceeds to purchase Chase cashier's check no. 1173012831 in the amount of \$27,250.34, payable to Florida Prepaid College Board, for plan no. 9100072223, in the defendant's name, for the benefit of her minor child born in 2005. The defendant delivered cashier's check no. 1173012831 to the Florida Prepaid College Board on or about April 6, 2015. The defendant knew that cashier's check no. 1173012831 represented the proceeds of some form of illegal activity, and she intended the transaction to conceal and disguise the nature, location, source, ownership, and control of the proceeds.

The Defendant's Purchase and Sale of Vehicles

19. On or about May 3, 2015, the defendant purchased a 2015 Chevrolet Tahoe pickup truck, with vehicle identification number ("VIN") ending in 7642, from Lorenzo Bomnin Chevrolet in Miami. The price of the truck was \$61,180. The defendant paid part of the purchase with \$19,000 in cash proceeds that she received from Jorin. The defendant knew that the cash was the proceeds of some form of unlawful activity, and she intended the transaction to conceal and disguise the nature, location, source, ownership, and control of the proceeds.

20. On or about January 25, 2016, the defendant knowingly deposited Carmax check no. 7110099807, in the amount of \$31,091.39, payable to Milagros Marile Acosta Torres, in her Chase account no. 3952. Carmex check no. 7110099807 was the proceeds from the defendant's sale of her 2015 Chevy Tahoe pickup truck with VIN ending in 7642, and the proceeds of computer fraud. The defendant knew that Carmex check no. 7110099807 was the proceeds of some form of unlawful activity, and she intended the transaction to conceal and disguise the nature, location, source, ownership, and control of the proceeds.

21. On or about March 5, 2016, the defendant knowingly wrote check no. 196 on her Chase account no. 3952, in the amount of \$12,950, payable to Off Lease Only, Inc. The defendant delivered check no. 196 to Off Lease Only, Inc., as partial payment for a Toyota Avalon automobile with VIN ending in 4218. Check no. 196 was proceeds of computer fraud, and the defendant knew that check no. 196 represented the proceeds of some form on unlawful activity. The defendant intended the transaction to conceal and disguise the nature, location, source, ownership, and control of the proceeds.

22. On or about October 8, 2018, the defendant knowingly deposited Carmax check no.

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7110124178, in the amount of \$13,000, payable to Milagros Marile Acosta Torres, in her Chase account no. 3952. Carmex check no. 7110124178 was the proceeds from the defendant's sale of her Toyota Avalon automobile with VIN ending in 4218, and the proceeds of computer fraud. The defendant knew that Carmex check no. 7110124178 was the proceeds of some form of unlawful activity, and she intended the transaction to conceal and disguise the nature, location, source, ownership, and control of the proceeds.

(Continued on next page.)

23. On October 15, 2018, the defendant visited a Chase branch in Miami-Dade County, where she knowingly withdrew \$14,500 in proceeds from her Chase account no. 3952. The defendant knowingly used the proceeds to purchase Chase cashier's check no. 1173020046 in the amount of \$14,500, payable to "John Doe." On or about October 17, 2018, the defendant knowingly delivered cashier's check no. 1173020046 to John Doe, as payment for a Ford F-150 pickup truck with VIN ending in 2044. The defendant knew that cashier's check no. 1173020046 represented the proceeds of some form of illegal activity, and she intended the transaction to conceal and disguise the nature, location, source, ownership, and control of the proceeds.

SO STIPULATED by the parties and their legal counsel.

Date: 1/31/2020

By:

ARIANA FAJARDO ORSHAN
UNITED STATES ATTORNEY


DWAYNE E. WILLIAMS
ASSISTANT UNITED STATES ATTORNEY

Date: 1/31/20

By:


ALFREDO A. IZAGUIRRE, ESQ.
ATTORNEY FOR DEFENDANT

Date: 1/31/20

By:


MILAGROS MIRALE ACOSTA TORRES
DEFENDANT

Exhibit E

UNITED STATES DISTRICT COURT
Southern District of Florida
Miami Division

UNITED STATES OF AMERICA
v.
MILAGROS MARILE ACOSTA TORRES

JUDGMENT IN A CRIMINAL CASE
Case Number: 19-CR-20435-GAYLES
USM Number: 20378-104

Counsel for Defendant: Alfredo Izaguirre, Esq.
Counsel for The United States: Dwayne Williams, AUSA
Court Reporter: Patricia Diaz

The defendant pleaded guilty to count 19 of the indictment.

The defendant is adjudicated guilty of these offenses:


<u>TITLE & SECTION</u>	<u>NATURE OF OFFENSE</u>	<u>OFFENSE ENDED</u>	<u>COUNT</u>
18 U.S.C. 1956(h)	Conspiracy to commit money laundering offenses	08/06/2019	19

The defendant is sentenced as provided in the following pages of this judgment. The sentence is imposed pursuant to the Sentencing Reform Act of 1984.

All remaining counts are dismissed on the motion of the government.

It is ordered that the defendant must notify the United States Attorney for this district within 30 days of any change of name, residence, or mailing address until all fines, restitution, costs, and special assessments imposed by this judgment are fully paid. If ordered to pay restitution, the defendant must notify the court and United States Attorney of material changes in economic circumstances.

Date of Imposition of Sentence: 7/24/2020



Darrin P. Gayles
United States District Judge

Date: July 24, 2020

DEFENDANT: Milagros Marile Acosta Torres

CASE NUMBER: 19-CR-20435-GAYLES

IMPRISONMENT

The defendant is hereby committed to the custody of the United States Bureau of Prisons to be imprisoned for a total term of 6 months.

The court makes the following recommendations to the Bureau of Prisons:

The defendant be designated to a facility as close to South Florida as possible.

The defendant shall surrender to the designated facility and/or the US Marshal for this District on or before 12:00 p.m. on 7/31/2020.

RETURN

I have executed this judgment as follows:

Defendant delivered on _____ to _____

at _____, with a certified copy of this judgment.

UNITED STATES MARSHAL

DEPUTY UNITED STATES MARSHAL

DEFENDANT: Milagros Marile Acosta Torres

CASE NUMBER: 19-CR-20435-GAYLES

SUPERVISED RELEASE

Upon release from imprisonment, the defendant shall be on supervised release for a term of 3 years.

The defendant must report to the probation office in the district to which the defendant is released within 72 hours of release from the custody of the Bureau of Prisons.

The defendant shall not commit another federal, state or local crime.

The defendant shall not unlawfully possess a controlled substance. The defendant shall refrain from any unlawful use of a controlled substance. The defendant shall submit to one drug test within 15 days of release from imprisonment and at least two periodic drug tests thereafter, as determined by the court.

The defendant shall cooperate in the collection of DNA as directed by the probation officer.

The defendant shall not possess a firearm, ammunition, destructive device, or any other dangerous weapon.

If this judgment imposes a fine or restitution, it is a condition of supervised release that the defendant pay in accordance with the Schedule of Payments sheet of this judgment.

The defendant must comply with the standard conditions that have been adopted by this court as well as with any additional conditions on the attached page.

STANDARD CONDITIONS OF SUPERVISION

1. The defendant shall not leave the judicial district without the permission of the court or probation officer;
2. The defendant shall report to the probation officer and shall submit a truthful and complete written report within the first fifteen days of each month;
3. The defendant shall answer truthfully all inquiries by the probation officer and follow the instructions of the probation officer;
4. The defendant shall support his or her dependents and meet other family responsibilities;
5. The defendant shall work regularly at a lawful occupation, unless excused by the probation officer for schooling, training, or other acceptable reasons;
6. The defendant shall notify the probation officer at least ten days prior to any change in residence or employment;
7. The defendant shall refrain from excessive use of alcohol and shall not purchase, possess, use, distribute, or administer any controlled substance or any paraphernalia related to any controlled substances, except as prescribed by a physician;
8. The defendant shall not frequent places where controlled substances are illegally sold, used, distributed, or administered;
9. The defendant shall not associate with any persons engaged in criminal activity and shall not associate with any person convicted of a felony, unless granted permission to do so by the probation officer;
10. The defendant shall permit a probation officer to visit him or her at any time at home or elsewhere and shall permit confiscation of any contraband observed in plain view of the probation officer;
11. The defendant shall notify the probation officer within seventy-two hours of being arrested or questioned by a law enforcement officer;
12. The defendant shall not enter into any agreement to act as an informer or a special agent of a law enforcement agency without the permission of the court; and
13. As directed by the probation officer, the defendant shall notify third parties of risks that may be occasioned by the defendant's criminal record or personal history or characteristics and shall permit the probation officer to make such notifications and to confirm the defendant's compliance with such notification requirement.

DEFENDANT: Milagros Marile Acosta Torres
CASE NUMBER: 19-CR-20435-GAYLES

SPECIAL CONDITIONS OF SUPERVISION

Cooperating with Immigration during Removal Proceedings - The defendant shall cooperate in any removal proceedings initiated or pending by the U.S. Immigration and Customs Enforcement consistent with the Immigration and Nationality Act. If removed, the defendant shall not reenter the United States without the prior written permission of the Undersecretary for Border and Transportation Security. The term of supervised release shall be non-reporting while the defendant is residing outside the United States. If the defendant reenters the United States within the term of probation, the defendant is to report to the nearest U.S. Probation Office within 72 hours of the defendant's arrival.

Financial Disclosure Requirement - The defendant shall provide complete access to financial information, including disclosure of all business and personal finances, to the U.S. Probation Officer.

No New Debt Restriction - The defendant shall not apply for, solicit or incur any further debt, included but not limited to loans, lines of credit or credit card charges, either as a principal or cosigner, as an individual or through any corporate entity, without first obtaining permission from the United States Probation Officer.

Permissible Search - The defendant shall submit to a search of his/her person or property conducted in a reasonable manner and at a reasonable time by the U.S. Probation Officer.

Self-Employment Restriction - The defendant shall obtain prior written approval from the Court before entering into any self-employment.

Unpaid Restitution, Fines, or Special Assessments - If the defendant has any unpaid amount of restitution, fines, or special assessments, the defendant shall notify the probation officer of any material change in the defendant's economic circumstances that might affect the defendant's ability to pay.

DEFENDANT: Milagros Marile Acosta Torres
CASE NUMBER: 19-CR-20435-GAYLES

CRIMINAL MONETARY PENALTIES

The defendant must pay the total criminal monetary penalties under the schedule of payments on Sheet 6.

	<u>Assessment</u>	<u>Fine</u>	<u>Restitution</u>
TOTALS	\$100.00	\$0.00	\$147,970.00

If the defendant makes a partial payment, each payee shall receive an approximately proportioned payment, unless specified otherwise in the priority order or percentage payment column below. However, pursuant to 18 U.S.C. § 3664(i), all nonfederal victims must be paid before the United States is paid.

<u>NAME OF PAYEE</u>	<u>TOTAL LOSS*</u>	<u>RESTITUTION ORDERED</u>
----------------------	--------------------	----------------------------

Restitution with Imprisonment - It is further ordered that the defendant shall pay restitution in the amount of \$147,970.00. During the period of incarceration, payment shall be made as follows: (1) if the defendant earns wages in a Federal Prison Industries (UNICOR) job, then the defendant must pay 50% of wages earned toward the financial obligations imposed by this Judgment in a Criminal Case; (2) if the defendant does not work in a UNICOR job, then the defendant must pay a minimum of \$25.00 per quarter toward the financial obligations imposed in this order. Upon release of incarceration, the defendant shall pay restitution at the rate of 10% of monthly gross earnings, until such time as the court may alter that payment schedule in the interests of justice. The U.S. Bureau of Prisons, U.S. Probation Office and U.S. Attorney's Office shall monitor the payment of restitution and report to the court any material change in the defendant's ability to pay. These payments do not preclude the government from using other assets or income of the defendant to satisfy the restitution obligations.

* Findings for the total amount of losses are required under Chapters 109A, 110, 110A, and 113A of Title 18 for offenses committed on or after September 13, 1994, but before April 23, 1996.

** Assessment due immediately unless otherwise ordered by the Court.

DEFENDANT: Milagros Marile Acosta Torres
CASE NUMBER: 19-CR-20435-GAYLES

SCHEDULE OF PAYMENTS

Having assessed the defendant's ability to pay, payment of the total criminal monetary penalties is due as follows:

A. Lump sum payment of \$100.00 due immediately.

Unless the court has expressly ordered otherwise, if this judgment imposes imprisonment, payment of criminal monetary penalties is due during imprisonment. All criminal monetary penalties, except those payments made through the Federal Bureau of Prisons' Inmate Financial Responsibility Program, are made to the clerk of the court.

The defendant shall receive credit for all payments previously made toward any criminal monetary penalties imposed.

This assessment/fine/restitution is payable to the CLERK, UNITED STATES COURTS and is to be addressed to:

U.S. CLERK'S OFFICE
ATTN: FINANCIAL SECTION
400 NORTH MIAMI AVENUE, ROOM 08N09
MIAMI, FLORIDA 33128-7716

The assessment/fine/restitution is payable immediately. The U.S. Bureau of Prisons, U.S. Probation Office and the U.S. Attorney's Office are responsible for the enforcement of this order.

Joint and Several with Co-Defendants and Co-Conspirators

Defendant and Co-Defendant Names and Case Numbers (including defendant number), Total Amount, Joint and Several Amount, and corresponding payee, if appropriate.

<u>CASE NUMBER</u> <u>DEFENDANT AND CO-DEFENDANT NAMES</u> <u>(INCLUDING DEFENDANT NUMBER)</u>	<u>TOTAL AMOUNT</u>	<u>JOINT AND SEVERAL AMOUNT</u>
Milagros Marile Acosta Torres and Co-Defendants Michel Aleu, Maria Del Pilar Aleu, Lester Lavin, Anisleydi Vergel Hermida, Yohander Jorrin Melhen, Leonardo Betancourt, and Yusmary Shirley Duran in case 19-CR-20435-GAYLES	\$147,970.00	\$147,970.00

The defendant shall forfeit the defendant's interest in the following property to the United States:

The items listed in the preliminary order of forfeiture on the court docket as entry 243.

Restitution is owed jointly and severally by the defendant and co-defendants in the above case.

Payments shall be applied in the following order: (1) assessment, (2) restitution principal, (3) restitution interest, (4) fine principal, (5) fine interest, (6) community restitution, (7) penalties, and (8) costs, including cost of prosecution and court costs.

Exhibit F



Application For Naturalization
 Department of Homeland Security
 U.S. Citizenship and Immigration Services

USCIS
 Form N-400
 OMB No. 1615-0052
 Expires 09/30/2015

For USCIS Use Only	Date Stamp	N400		
Remarks				

Type or print all your answers in black ink. Type or print "N/A" if an item is not applicable or the answer is none otherwise indicated. Failure to answer all of the questions may delay USCIS processing your Form N-400. NOTE: You must complete Parts 1. - 14.

Part 1. Information About Your Eligibility (Check only one box or your Form N-400 may be delayed)

Enter Your 9 Digit A-Number:

▶ A- [REDACTED] 5 1 8

You are at least 18 years old and

- Have been a Permanent Resident of the United States for at least 5 years.
- Have been a Permanent Resident of the United States for at least 3 years. In addition, you have been married to and living with the same U.S. citizen spouse for the last 3 years, and your spouse has been a U.S. citizen for the last 3 years at the time of filing your Form N-400.
- Are a Permanent Resident of the United States, and you are the spouse of a U.S. citizen, and your U.S. citizen spouse is regularly engaged in specified employment abroad. (Section 319(b) of the Immigration and Nationality Act)
- Are applying on the basis of qualifying military service.
- Other (explain): _____

Part 2. Information About You (Person applying for naturalization)

1. Your Current Legal Name (do not provide a nickname)

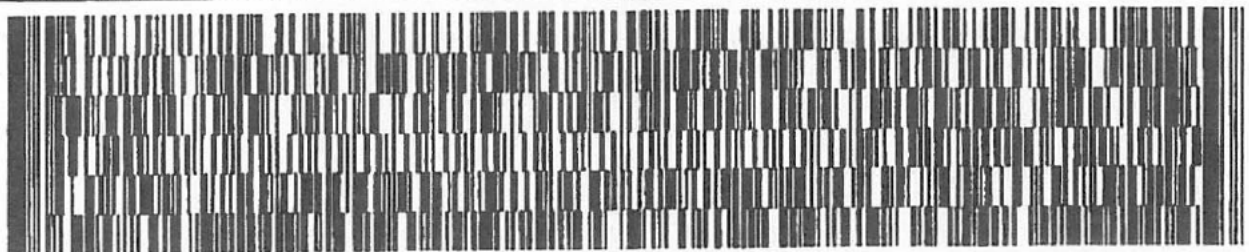
Family Name (Last Name)	Given Name (First Name)	Middle Name (if applicable)
ACOSTA TORRES	MILAGROS	MARILEISIS

2. Your Name Exactly As It Appears on Your Permanent Resident Card (if applicable)

Family Name (Last Name)	Given Name (First Name)	Middle Name (if applicable)
ACOSTA TORRES	MILAGROS	M

3. Other Name(s) You Have Used Since Birth (include nicknames, aliases, and maiden name if applicable)

Family Name (Last Name)	Given Name (First Name)	Middle Name (if applicable)
ACOSTA TORRES	MILAGROS	MARILEISIS



Part 2. Information About You (continued)

A- [REDACTED] 5 1 8

4. Name Change (optional)

Read the Form N-400 Instructions before you decide whether or not you would like to legally change your name.

Would you like to legally change your name?

Yes No

If "Yes," print the new name you would like to use in the space below.

Family Name (Last Name)

Given Name (First Name)

Middle Name (if applicable)

[REDACTED]

[REDACTED]

[REDACTED]

5. U.S. Social Security Number (if applicable)

[REDACTED] 9-4-7

6. Date of Birth (mm/dd/yyyy)

[REDACTED] 986

7. Date You Became a Permanent Resident (mm/dd/yyyy)

[REDACTED] 06/27/2010

8. Country of Birth

CUBA

9. Country of Citizenship or Nationality

CUBA

10. Are you requesting an accommodation(s) to the naturalization process because of a disability and/or an impairment? (See Form N-400 Instructions for accommodation examples)

Yes No

If "Yes," check the box(es) below that applies:

Deaf or hard of hearing and need an interpreter who uses the following sign language (e.g., American Sign Language):

[REDACTED]

Use a wheelchair or other device that assists with mobility.

Blind or low vision.

Require another type of accommodation. (explain):

[REDACTED]

11. Do you have a physical or developmental disability or mental impairment that prevents you from demonstrating your knowledge and understanding of the English language and/or civics requirements for naturalization?

Yes No

If "Yes," submit a completed Form N-648, Medical Certification for Disability Exceptions, when you file your Form N-400.

12. Exemptions from the English Language Test

A. Are you 50 years of age or older and have you lived in the United States as a Permanent Resident for periods totaling at least 20 years at the time of filing your Form N-400?

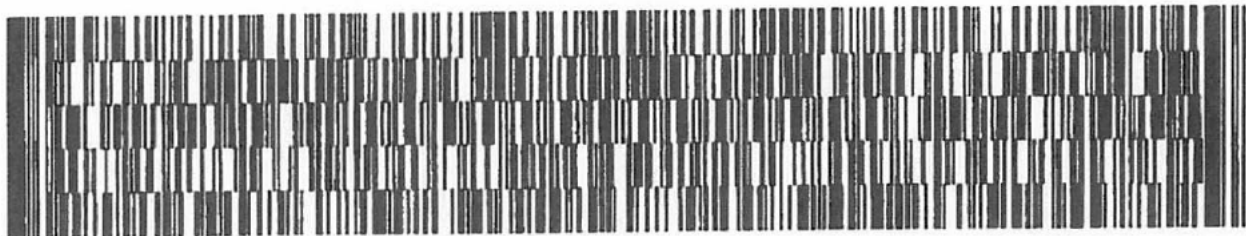
Yes No

B. Are you 55 years of age or older and have you lived in the United States as a Permanent Resident for periods totaling at least 15 years at the time of filing your Form N-400?

Yes No

C. Are you 65 years of age or older and have you lived in the United States as a Permanent Resident for periods totaling at least 20 years at the time of filing your Form N-400? (If you meet this requirement, you will also be given a simplified version of the civics test.)

Yes No



Part 3. Information to Contact You

A- [REDACTED] 5 1 8

- 1. Daytime Phone Number [REDACTED]
- 2. Work Phone Number (if any) ([REDACTED]) - [REDACTED]
- 3. Evening Phone Number ([REDACTED]) - [REDACTED]
- 4. Mobile Phone Number (if any) [REDACTED]
- 5. E-mail Address (if any) [REDACTED]

Part 4. Information About Your Residence

- 1. Where have you lived during the last 5 years? Begin with where you live now and then list every location where you have lived during the last 5 years. If you need more space, use an additional sheet(s) of paper.

Date of Residence From (mm/dd/yyyy) ▶ 12/01/2012 To (mm/dd/yyyy) ▶ Present

Street Number and Name [REDACTED] Apt. Ste. Flr. Number [REDACTED]

City County State ZIP Code + 4
MIAMI DADE FL 33177 - [REDACTED]

Province or Region (foreign address only) Country (foreign address only) Postal Code (foreign address only)
[REDACTED] USA [REDACTED]

A. Mailing Address (if different from the address above)

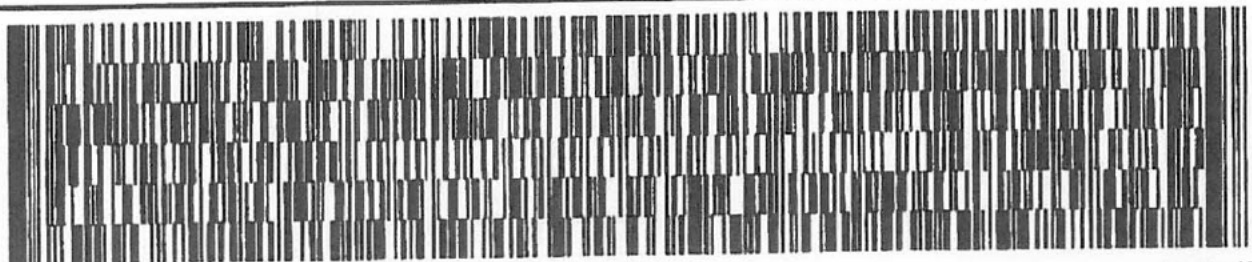
C/O ("In Care Of" Name, if applicable)

[REDACTED]

Street Number and Name [REDACTED] Apt. Ste. Flr. Number [REDACTED]

City State ZIP Code + 4
[REDACTED] [REDACTED] [REDACTED] - [REDACTED]

Province or Region (foreign address only) Country (foreign address only) Postal Code (foreign address only)
[REDACTED] [REDACTED] [REDACTED]



Part 4. Information About Your Residence (continued)

A- [REDACTED] 5 1 8

2. Date of Residence From (mm/dd/yyyy) ▶ 06/27/2010 To (mm/dd/yyyy) ▶ 12/01/2012

Street Number and Name [REDACTED] Apt. Ste. Flr. Number

City HOMESTEAD County DADE State FL ZIP Code + 4 33032 -

Province or Region (foreign address only) Country (foreign address only) USA Postal Code (foreign address only)

3. Date of Residence From (mm/dd/yyyy) ▶ [] To (mm/dd/yyyy) ▶ []

Street Number and Name [] Apt. Ste. Flr. Number

City [] County [] State [] ZIP Code + 4 [] - []

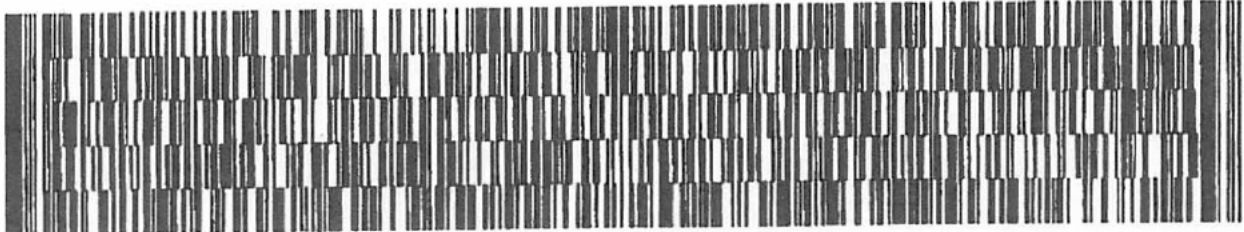
Province or Region (foreign address only) Country (foreign address only) Postal Code (foreign address only)

4. Date of Residence From (mm/dd/yyyy) ▶ [] To (mm/dd/yyyy) ▶ []

Street Number and Name [] Apt. Ste. Flr. Number

City [] County [] State [] ZIP Code + 4 [] - []

Province or Region (foreign address only) Country (foreign address only) Postal Code (foreign address only)



Part 5. Information About Your Parents

A- [REDACTED] 5 1 8

If your biological or legally adoptive mother or father is a U.S. citizen by birth, or naturalized before you reached your 18th birthday, you may already be a U.S. citizen. Visit the USCIS Web site at www.uscis.gov for further information on this topic before you consider filing Form N-400.

- 1. Were your parents married before your 18th birthday? Yes No
 - 2. Is your mother a U.S. citizen? Yes No
- If "Yes," complete the following information.

A. Current Legal Name of U.S. Citizen Mother

Mother's Family Name (Last Name) Mother's Given Name (First Name) Mother's Middle Name (if applicable)

B. Mother's Country of Birth

C. Mother's Date of Birth (mm/dd/yyyy)

- 3. Is your father a U.S. citizen? Yes No
- If "Yes," complete the information below.

A. Current Legal Name of U.S. Citizen Father

Father's Family Name (Last Name) Father's Given Name (First Name) Father's Middle Name (if applicable)

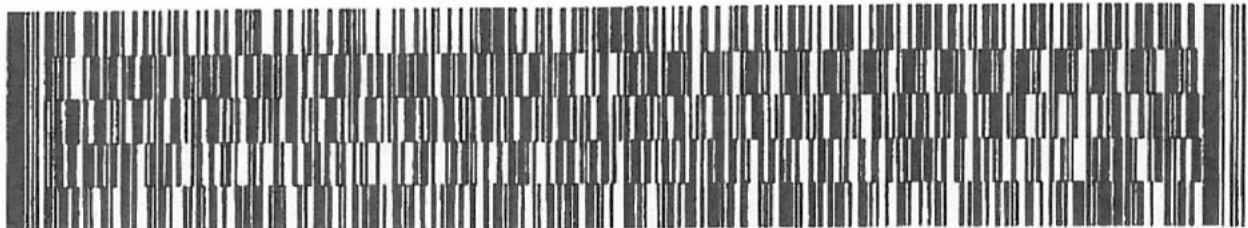
B. Father's Country of Birth

C. Father's Date of Birth (mm/dd/yyyy)

Part 6. Information for Criminal Records Check

NOTE: USCIS requires you to complete the categories below to conduct background checks. (See Form N-400 Instructions for more information)

- 1. Gender Male Female 2. Height Feet Inches
- 3. Ethnicity (Select one)
 - Hispanic or Latino Not Hispanic or Latino
- 4. Race (Select one or more)
 - White Asian Black or African American American Indian or Alaska Native Native Hawaiian or Other Pacific Islander
- 5. Hair color
 - Black Brown Blonde Gray White Red Sandy Bald (No hair)



Part 6. Information for Criminal Records Check (continued)

A- [REDACTED] 5 1 8

6. Eye color

- Brown
- Blue
- Green
- Hazel
- Gray
- Black
- Pink
- Maroon
- Other

Part 7. Information About Your Employment and Schools You Attended

List where you have worked or attended school full time or part time during the last 5 years. Provide information for the complete time period. Include all military, police, and/or intelligence service. Begin by providing information about your most recent or current employment, studies, or unemployment (if applicable). Provide the locations and dates where you worked, were self-employed, were unemployed, or have studied for the last 5 years. If you worked for yourself, write "self-employed." If you were unemployed, write "unemployed." If you need more space, use an additional sheet(s) of paper to complete Part 7.

1. Employer or School Name

NONE

Street Number and Name *Homemaker* Apt. Ste. Flr. Number

City *Supported by Spouse* State ZIP Code + 4

Province or Region (foreign address only) Country (foreign address only) Postal Code (foreign address only)

Date From (mm/dd/yyyy) *6/10* Date To (mm/dd/yyyy) *Present* Your Occupation

2. Employer or School Name

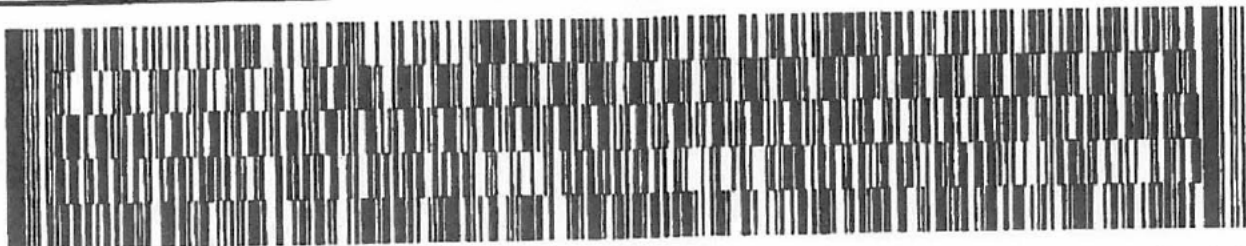
[Empty field]

Street Number and Name Apt. Ste. Flr. Number

City State ZIP Code + 4

Province or Region (foreign address only) Country (foreign address only) Postal Code (foreign address only)

Date From (mm/dd/yyyy) Date To (mm/dd/yyyy) Your Occupation



Part 7. Information About Your Employment and Schools You Attended
(continued)

A- [REDACTED] 5 1 8

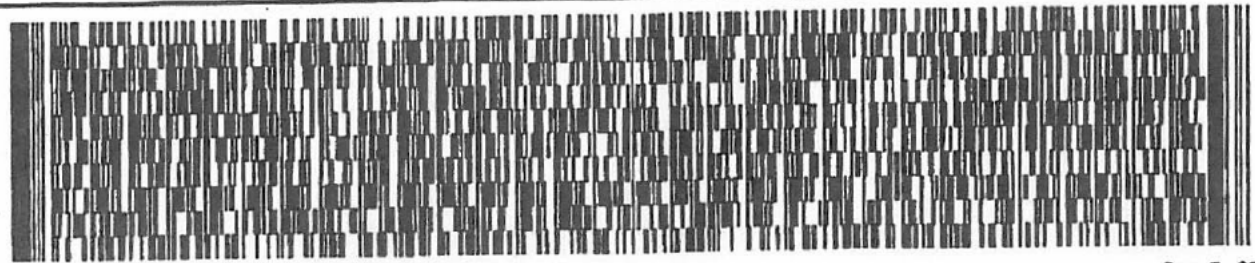
3. Employer or School Name

 Street Number and Name _____ Apt. Ste. Fir. Number
 _____ _____
 City _____ State _____ ZIP Code + 4
 _____ - _____
 Province or Region (foreign address only) _____ Country (foreign address only) _____ Postal Code (foreign address only) _____
 Date From (mm/dd/yyyy) _____ Date To (mm/dd/yyyy) _____ Your Occupation _____
 ▶ _____ ▶ _____

Part 8. Time Outside the United States

- How many total days (24 hours or longer) did you spend outside the United States during the last 5 years? days
- How many trips of 24 hours or longer have you taken outside the United States during the last 5 years? trips
- List below all the trips of 24 hours or longer that you have taken outside the United States during the last 5 years. Begin with your most recent trip and work backwards. If you need more space, use an additional sheet(s) of paper.

Date You Left the United States (mm/dd/yyyy)	Date You Returned to the United States (mm/dd/yyyy)	Did Trip Last 6 Months or More?	Countries to Which You Traveled	Total Days Outside the United States
06/19/2015	06/25/2015	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	SANTA LUCIA	6
09/25/2014	09/28/2015	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	NASSAU BAHAMAS	3
09/5/2014	09/08/2014	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	NASSAU BAHAMAS	3
07/10/2014	07/16/2014	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	CANCUN MEXICO	6
06/28/2014	07/03/2014	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	CUBA	6
08/7/2013	08/13/2013	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	PUNTA CANA REPUBLIC DOMINICANA	6



Part 9. Information About Your Marital History

A- [REDACTED] 5 1 8

1. What is your current marital status?

- Single, never married
- Married
- Separated
- Divorced
- Widowed
- Marriage annulled

2. If you are married, is your spouse a current member of the U.S. Armed Forces?

- Yes
- No

3. How many times have you been married (including annulled marriages and marriage(s) to the same person)?

1

If you are single and have never been married, indicate "0" and go to Part 10.

4. If you are married now, provide the following information about your current spouse.

A. Legal Name of Current Spouse

Family Name (Last Name)	Given Name (First Name)	Middle Name (if applicable)
JORRIN MELHEN	YOHANDER	

B. Previous Legal Name of Current Spouse

Family Name (Last Name)	Given Name (First Name)	Middle Name (if applicable)

C. Other Names Used by Current Spouse (include nicknames, aliases, and maiden name, if applicable)

Family Name (Last Name)	Given Name (First Name)	Middle Name (if applicable)

D. Current Spouse's Date of Birth

(mm/dd/yyyy) ▶ [REDACTED] 977

E. Date You Entered into Marriage with Current Spouse

(mm/dd/yyyy) ▶ 01/14/2009

F. Current Spouse's Present Home Address

Street Number and Name [REDACTED] Apt. Ste. Flr. Number

City	County	State	ZIP Code + 4
MIAMI	DADE	FL	33177 - [REDACTED]

Province or Region (foreign address only)	Country (foreign address only)	Postal Code (foreign address only)
	USA	

G. Current Spouse's Present Employer

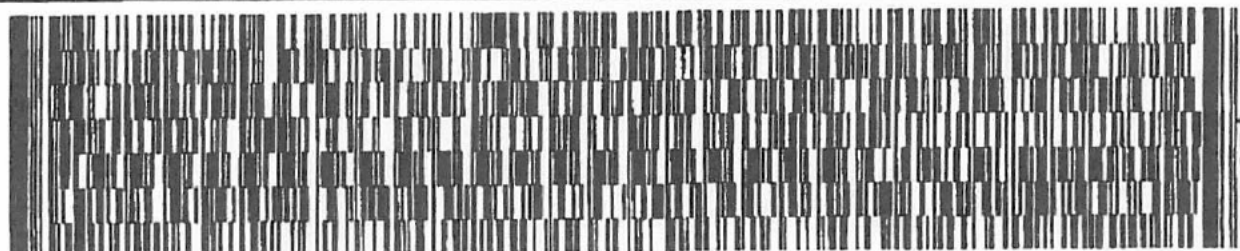
MICCOSUKEE RESORT AND GAMIG

5. Is your current spouse a U.S. citizen?

- Yes
- No

If "Yes," answer Item Number 6.

If "No," go to Item Number 7.



Part 9. Information About Your Marital History (continued)

A- [REDACTED] 5:18

6. If your current spouse is a U.S. citizen, complete the following information.

A. When did your current spouse become a U.S. citizen?

At birth - Go to Item Number 8. Other - Complete the following information.

B. Date your current spouse became a U.S. citizen

(mm/dd/yyyy) ▶ 09/21/2012

7. If your current spouse is not a U.S. citizen, complete the following information.

A. Current Spouse's Country of Citizenship or Nationality

[REDACTED]

B. Current Spouse's A-Number (if applicable)

▶ A- [REDACTED]

C. Current Spouse's Immigration Status

Permanent Resident Other (explain): [REDACTED]

8. How many times has your current spouse been married (including annulled marriages and marriage(s) to the same person)? If your current spouse has been married before, provide the following information about your current spouse's prior spouse.

[REDACTED]

2

If your current spouse has had more than one previous marriage, use an additional sheet(s) of paper to provide the information requested in Items A. - H. below for each marriage.

A. Prior Spouse's Family Name (Last Name)

[REDACTED]

Given Name (First Name)

[REDACTED]

Middle Name (if applicable)

[REDACTED]

B. Prior Spouse's Immigration Status

U.S. Citizen Permanent Resident Other (explain): [REDACTED]

C. Prior Spouse's Date of Birth

(mm/dd/yyyy) ▶ [REDACTED]

D. Prior Spouse's Country of Birth

[REDACTED]

E. Prior Spouse's Country of Citizenship or Nationality

[REDACTED]

F. Date of Marriage with Prior Spouse

(mm/dd/yyyy) ▶ [REDACTED]

G. Date Marriage Ended with Prior Spouse

(mm/dd/yyyy) ▶ [REDACTED]

H. How Marriage Ended with Prior Spouse

Annulled Divorced Spouse Deceased Other (explain): [REDACTED]



Form N-400 09/25/13 N

10-07 081915 N900CIV-660060

Part 10. Information About Your Children (continued)

A- [REDACTED] 5 1 8

A.5. Child's Current Address

Street Number and Name [REDACTED] Apt. Ste. Flr. Number [REDACTED]

City County State ZIP Code + 4
 MIAMI DADE FL 33177 - [REDACTED]

Province or Region (foreign address only) Country (foreign address only) Postal Code (foreign address only)
 [REDACTED] USA [REDACTED]

A.6. What is your child's relationship to you? (e.g., biological child, stepchild, legally adopted child)

BIOLOGICAL CHILD

B.1. Child's Current Legal Name

Family Name (Last Name) Given Name (First Name) Middle Name (if applicable)
 [REDACTED] [REDACTED] [REDACTED]

B.2. Child's A-Number (if applicable)

A- [REDACTED]

B.3. Child's Date of Birth

(mm/dd/yyyy) [REDACTED] 2013

B.4. Child's Country of Birth

USA

B.5. Child's Current Address

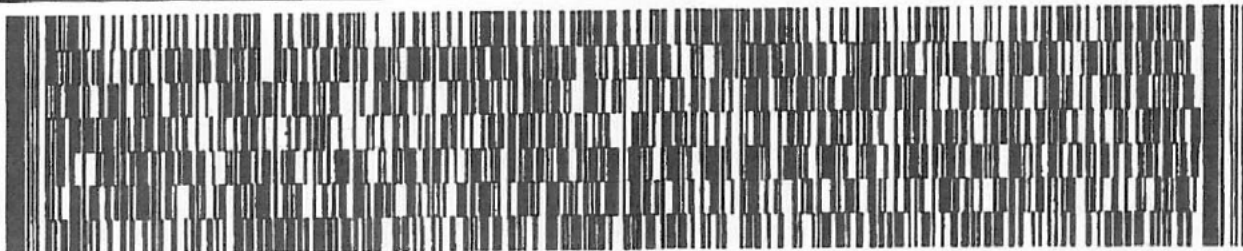
Street Number and Name [REDACTED] Apt. Ste. Flr. Number [REDACTED]

City County State ZIP Code + 4
 MIAMI DADE FL 33177 - [REDACTED]

Province or Region (foreign address only) Country (foreign address only) Postal Code (foreign address only)
 [REDACTED] USA [REDACTED]

B.6. What is your child's relationship to you? (e.g., biological child, stepchild, legally adopted child)

BIOLOGICAL CHILD



Part 10. Information About Your Children (continued)

A- [REDACTED] 5 1 8

C.1. Child's Current Legal Name

Family Name (Last Name)

Given Name (First Name)

Middle Name (if applicable)

[Empty text boxes for names]

C.2. Child's A-Number (if applicable)

▶ A- [Empty text box]

C.3. Child's Date of Birth

(mm/dd/yyyy) ▶ [Empty text box]

C.4. Child's Country of Birth

[Empty text box]

C.5. Child's Current Address

Street Number and Name

Apt. Ste. Fir. Number

[Empty text boxes for address and apartment numbers]

City

County

State

ZIP Code + 4

[Empty text boxes for city, county, state, and ZIP code]

Province or Region (foreign address only)

Country (foreign address only)

Postal Code (foreign address only)

[Empty text boxes for foreign address information]

C.6. What is your child's relationship to you? (e.g., biological child, stepchild, legally adopted child)

[Empty text box]

D.1. Child's Current Legal Name

Family Name (Last Name)

Given Name (First Name)

Middle Name (if applicable)

[Empty text boxes for names]

D.2. Child's A-Number (if applicable)

▶ A- [Empty text box]

D.3. Child's Date of Birth

(mm/dd/yyyy) ▶ [Empty text box]

D.4. Child's Country of Birth

[Empty text box]

D.5. Child's Current Address

Street Number and Name

Apt. Ste. Fir. Number

[Empty text boxes for address and apartment numbers]

City

County

State

ZIP Code + 4

[Empty text boxes for city, county, state, and ZIP code]

Province or Region (foreign address only)

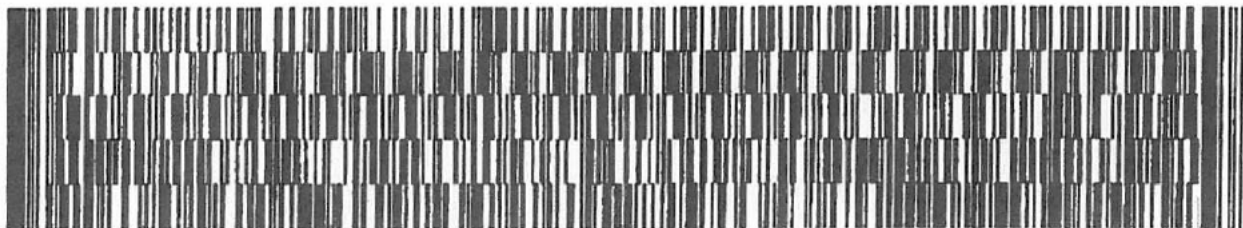
Country (foreign address only)

Postal Code (foreign address only)

[Empty text boxes for foreign address information]

D.6. What is your child's relationship to you? (e.g., biological child, stepchild, legally adopted child)

[Empty text box]



Part II. Additional Information

A- [REDACTED] 5 1 8

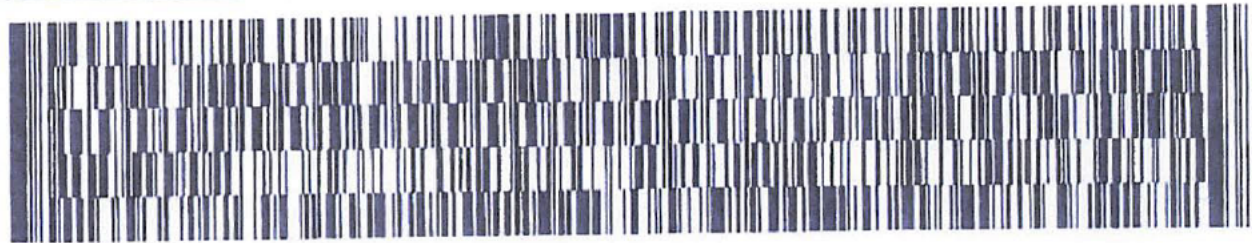
Answer Item Numbers 1. - 21. If you answer "Yes" to any of these questions, include a written explanation on an additional sheet(s) of paper and provide any evidence to support your answer.

- 1. Have you ever claimed to be a U.S. citizen (in writing or any other way)? Yes No
- 2. Have you ever registered to vote in any Federal, State, or local election in the United States? Yes No
- 3. Have you ever voted in any Federal, State, or local election in the United States? Yes No
- 4. Do you now have, or did you ever have, a hereditary title or an order of nobility in any foreign country? Yes No
- 5. Have you ever been declared legally incompetent, or been confined to a mental institution? Yes No
- 6. Do you owe any overdue Federal, State, or local taxes? Yes No
- 7. A. Have you ever not filed a Federal, State, or local tax return since you became a Permanent Resident? Yes No
 B. If "Yes," did you consider yourself to be a "non-U.S. resident"? Yes No
- 8. Have you called yourself a "non-U.S. resident" on a Federal, State, or local tax return since you became a Permanent Resident? Yes No
- 9. A. Have you ever been a member of, involved in, or in any way associated with, any organization, association, fund, foundation, party, club, society, or similar group in the United States or in any other location in the world? Yes No

B. If "Yes," provide the information below. If you need more space, attach the names of the other group(s) on an additional sheet(s) of paper and provide any evidence to support your answer.

Name of Group	Purpose of the Group	Dates of Membership	
		From (mm/dd/yyyy)	To (mm/dd/yyyy)

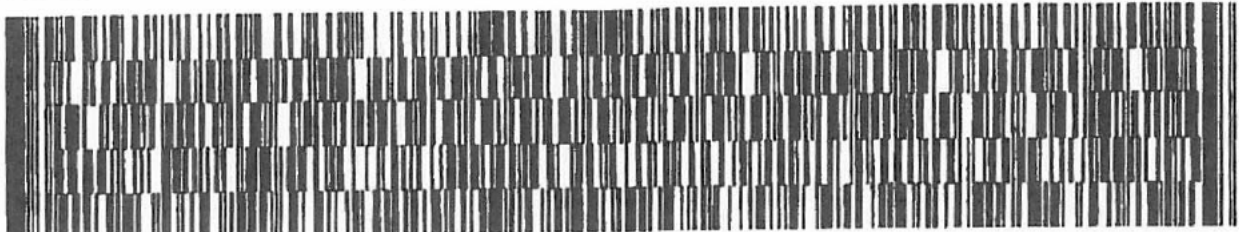
- 10. Have you ever been a member of, or in any way associated (either directly or indirectly) with:
 - A. The Communist Party? Yes No
 - B. Any other totalitarian party? Yes No
 - C. A terrorist organization? Yes No



Part 11. Additional Information (continued)

A- [REDACTED] 5 1 8

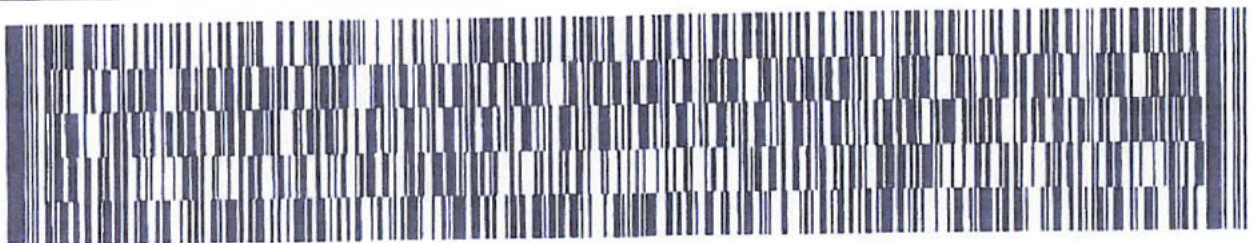
- 11. Have you ever advocated (either directly or indirectly) the overthrow of any government by force or violence? Yes No
- 12. Have you ever persecuted (either directly or indirectly) any person because of race, religion, national origin, membership in a particular social group, or political opinion? Yes No
- 13. Between March 23, 1933 and May 8, 1945, did you work for or associate in any way (either directly or indirectly) with:
 - A. The Nazi government of Germany? Yes No
 - B. Any government in any area (1) occupied by, (2) allied with, or (3) established with the help of the Nazi government of Germany? Yes No
 - C. Any German, Nazi, or S.S. military unit, paramilitary unit, self-defense unit, vigilante unit, citizen unit, police unit, government agency or office, extermination camp, concentration camp, prisoner of war camp, prison, labor camp, or transit camp? Yes No
- 14. Were you ever involved in any way with any of the following:
 - A. Genocide? Yes No
 - B. Torture? Yes No
 - C. Killing, or trying to kill, someone? Yes No
 - D. Badly hurting, or trying to hurt, a person on purpose? Yes No
 - E. Forcing, or trying to force, someone to have any kind of sexual contact or relations? Yes No
 - F. Not letting someone practice his or her religion? Yes No
- 15. Were you ever a member of, or did you ever serve in, help, or otherwise participate in, any of the following groups:
 - A. Military unit? Yes No
 - B. Paramilitary unit? (a group of people who act like a military group but are not part of the official military) Yes No
 - C. Police unit? Yes No
 - D. Self-defense unit? Yes No
 - E. Vigilante unit? (a group of people who act like the police, but are not part of the official police) Yes No
 - F. Rebel group? Yes No
 - G. Guerrilla group? (a group of people who use weapons against or otherwise physically attack the military, police, government, or other people) Yes No
 - H. Militia? (an army of people, not part of the official military) Yes No
 - I. Insurgent organization? (a group that uses weapons and fights against a government) Yes No



Part 11. Additional Information (continued)

A- [REDACTED] 5 1 8

- 16. Were you ever a worker, volunteer, or soldier, or did you otherwise ever serve in any of the following:
 - A. Prison or jail? Yes No
 - B. Prison camp? Yes No
 - C. Detention facility? (a place where people are forced to stay) Yes No
 - D. Labor camp? (a place where people are forced to work) Yes No
 - E. Any other place where people were forced to stay? Yes No
 - 17. Were you ever a part of any group, or did you ever help any group, unit, or organization that used a weapon against any person; or threatened to do so?
 - A. If "Yes," when you were part of this group, or when you helped this group, did you ever use a weapon against another person? Yes No
 - B. If "Yes," when you were part of this group, or when you helped this group, did you ever tell another person that you would use a weapon against that person? Yes No
 - 18. Did you ever sell, give, or provide weapons to any person, or help another person sell, give, or provide weapons to any person?
 - A. If "Yes," did you know that this person was going to use the weapons against another person? Yes No
 - B. If "Yes," did you know that this person was going to sell or give the weapons to someone who was going to use them against another person? Yes No
 - 19. Did you ever receive any type of military, paramilitary (a group of people who act like a military group but are not part of the official military), or weapons training? Yes No
 - 20. Did you ever recruit (ask), enlist (sign up), conscript (require), or use any person under age 15 to serve in or help an armed force or group? Yes No
 - 21. Did you ever use any person under age 15 to do anything that helped or supported people in combat? Yes No
- If any of Item Numbers 22. - 28. apply to you, you must answer "Yes" even if your records have been sealed, expunged, or otherwise cleared. You must disclose this information even if anyone, including a judge, law enforcement officer, or attorney, told you that it no longer constitutes a record or told you that you do not have to disclose the information.
- 22. Have you ever committed, assisted in committing, or attempted to commit, a crime or offense for which you were not arrested? Yes No
 - 23. Have you ever been arrested, cited, or detained by any law enforcement officer (including any and all immigration officials or the U.S. Armed Forces) for any reason? Yes No
 - 24. Have you ever been charged with committing, attempting to commit, or assisting in committing a crime or offense? Yes No
 - 25. Have you ever been convicted of a crime or offense? Yes No
 - 26. Have you ever been placed in an alternative sentencing or a rehabilitative program (e.g., diversion, deferred prosecution, withheld adjudication, deferred adjudication)? Yes No



Part II. Additional Information (continued)

A- [Redacted] 5 1 8

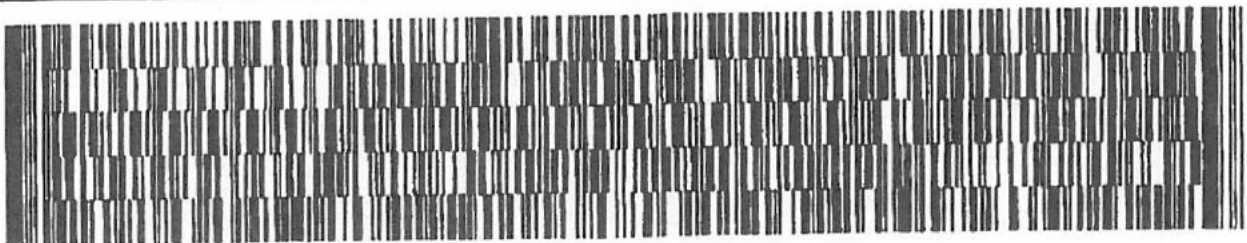
27. A. Have you ever received a suspended sentence, been placed on probation, or been paroled? Yes No
 B. If "Yes," have you completed the probation or parole? Yes No
28. A. Have you ever been in jail or prison? Yes No
 B. If "Yes," how long were you in jail or prison? Years Months Days
29. If you answered "Yes" to Item Numbers 23. - 28., complete the following table. If you need more space, use an additional sheet(s) of paper and provide any evidence to support your answer. If you answered "No" to all Item Numbers 23. - 28., go to Item Number 30.

Why were you arrested, cited, detained, or charged?	Date arrested, cited, detained, or charged. (mm/dd/yyyy)	Where were you arrested, cited, detained, or charged? (City, State, Country)	Outcome or disposition of the arrest, citation, detention or charge (no charges filed, charges dismissed, jail, probation, etc.)
claims no arrests,		offenses, of	all IS

(3)

Answer Item Numbers 30. - 46. If you answer "Yes" to any of these questions, except Item Numbers 37. and 38., include a written explanation on an additional sheet(s) of paper and provide any evidence to support your answer.

30. Have you ever:
- A. Been a habitual drunkard? Yes No
 - B. Been a prostitute, or procured anyone for prostitution? Yes No
 - C. Sold or smuggled controlled substances, illegal drugs, or narcotics? Yes No
 - D. Been married to more than one person at the same time? Yes No
 - E. Married someone in order to obtain an immigration benefit? Yes No
 - F. Helped anyone to enter, or try to enter, the United States illegally? Yes No
 - G. Gambled illegally or received income from illegal gambling? Yes No
 - H. Failed to support your dependents or to pay alimony? Yes No
 - I. Made any misrepresentation to obtain any public benefit in the United States? Yes No



Part 11. Additional Information (continued)

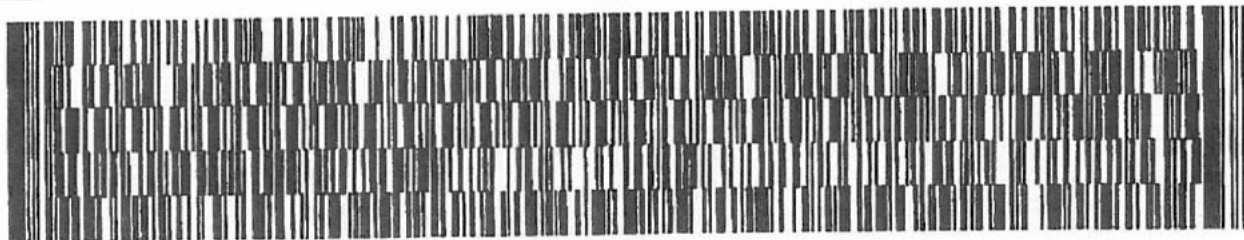
A- [REDACTED] 5 1 8

- 31. Have you ever given any U.S. Government official(s) any information or documentation that was false, fraudulent, or misleading? Yes No
- 32. Have you ever lied to any U.S. Government official to gain entry or admission into the United States or to gain immigration benefits while in the United States? Yes No
- 33. Have you ever been removed, excluded, or deported from the United States? Yes No
- 34. Have you ever been ordered removed, excluded, or deported from the United States? Yes No
- 35. Have you ever been placed in removal, exclusion, rescission, or deportation proceedings? Yes No
- 36. Are removal, exclusion, rescission, or deportation proceedings (including administratively closed proceedings) currently pending against you? Yes No
- 37. Have you ever served in the U.S. Armed Forces? Yes No
- 38. Are you currently a member of the U.S. Armed Forces? Yes No
- 39. If you are currently a member of the U.S. Armed Forces, are you scheduled to deploy overseas, including to a vessel, within the next 3 months? (Refer to the Address Change section within the Form N-400 Instructions on how to notify USCIS if you learn of your deployment plans after you file your Form N-400.) Yes No
- 40. If you are currently a member of the U.S. Armed Forces, are you currently stationed overseas? Yes No
- 41. Have you ever been court-martialed, administratively separated, or disciplined, or have you received an other than honorable discharge, while in the U.S. Armed Forces? Yes No
- 42. Have you ever been discharged from training or service in the U.S. Armed Forces because you were an alien? Yes No
- 43. Have you ever left the United States to avoid being drafted in the U.S. Armed Forces? Yes No
- 44. Have you ever applied for any kind of exemption from military service in the U.S. Armed Forces? Yes No
- 45. Have you ever deserted from the U.S. Armed Forces? Yes No
- 46. A. Are you a male who lived in the United States at any time between your 18th and 26th birthdays? (This does not include living in the United States as a lawful nonimmigrant.) Yes No

B. If "Yes," when did you register for the Selective Service? Provide the information below.

Date Registered (mm/dd/yyyy) ▶

Selective Service Number



Part 11. Additional Information (continued)

A- [Redacted] 5 1 8

C. If "Yes," but you did not register with the Selective Service System and you are:

1. Still under 26 years of age, you must register before you apply for naturalization, and complete the Selective Service information above; OR
2. Now 26 years of age or older but you did not register with the Selective Service, you must attach a statement explaining why you did not register, and a status information letter from the Selective Service.

Answer Item Numbers 47. - 53. If you answer "No" to any of these questions, include a written explanation on an additional sheet(s) of paper and provide any evidence to support your answer.

47. Do you support the Constitution and form of government of the United States? Yes No
48. Do you understand the full Oath of Allegiance to the United States? Yes No
49. Are you willing to take the full Oath of Allegiance to the United States? Yes No
50. If the law requires it, are you willing to bear arms on behalf of the United States? Yes No
51. If the law requires it, are you willing to perform noncombatant services in the U.S. Armed Forces? Yes No
52. If the law requires it, are you willing to perform work of national importance under civilian direction? Yes No

NOTE: Answer the next question ONLY if you answered "Yes" to Part 11., Item Number 4. of Form N-400.

53. At your naturalization ceremony, are you willing to give up any inherited title(s) or order(s) of nobility that you have in a foreign country? Yes No

Part 12. Your Signature (USCIS will reject your Form N-400 if it is not signed)

Your Statement

I certify, under penalty of perjury under the laws of the United States of America, that this application, and the evidence submitted with it, are all true and correct. I authorize the release of any information USCIS needs to determine my eligibility for naturalization.

Your Signature

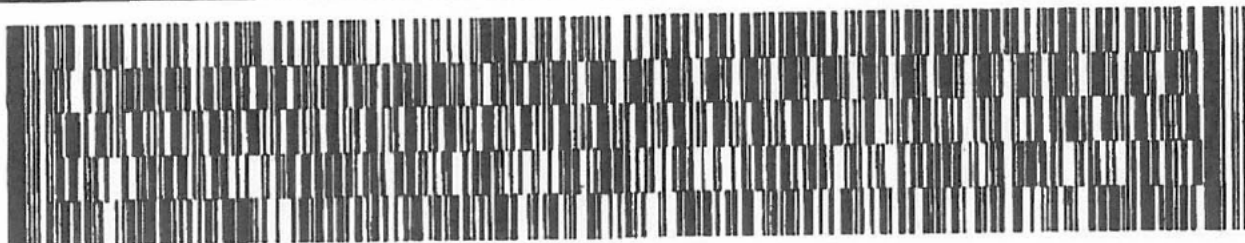
[Handwritten Signature: M. Deesta]

Date (mm/dd/yyyy)

08/12/2015

Part 13. Signature and Contact Information of the Person Who Prepared This Form, If Other Than the Applicant

By my signature, I certify, swear or affirm, under penalty of perjury, that I prepared this form on behalf of, at the request of, and with the express consent of the applicant. I completed the form based only on responses the applicant provided to me. After completing the form, I reviewed it and all of the applicant's responses with the applicant, who agreed with every answer he or she provided for each question on the form and, when required, supplied additional information to respond to a question on the form.



Part 13. Signature and Contact Information of the Person Who Prepared This Form, If Other Than the Applicant (continued)

A- [Redacted] 5' 1 8

Preparer's Printed Name

Family Name (Last Name)

Given Name (First Name)

Middle Name (if applicable)

[Input fields for Family Name, Given Name, Middle Name]

Preparer's Signature

Date (mm/dd/yyyy)

[Input fields for Signature, Date]

Preparer's Firm or Organization Name (if applicable)

Preparer's Daytime Phone Number

[Input fields for Firm Name, Phone Number]

Preparer's Address

Street Number and Name

Apt. Ste. Flr. Number

[Input fields for Street Name, Apt. Ste. Flr. Number]

City

County

State

ZIP Code + 4

[Input fields for City, County, State, ZIP Code]

Province or Region (foreign address only)

Country (foreign address only)

Postal Code (foreign address only)

[Input fields for Province, Country, Postal Code]

Preparer's E-mail Address

Preparer's Fax Number

[Input fields for E-mail Address, Fax Number]

Part 14. Statement of Applicants Who Used an Interpreter

NOTE: If you answered "Yes" to Part 2., Item Numbers 11. or 12. of this form and during the completion of the form used an interpreter to interpret the questions on the form, then you and your interpreter must complete this section.

Applicant's Statement

Each and every question and instruction on this form, as well as my answer to each question, has been read to me by the interpreter named below in [Redacted], a language in which I am fluent.

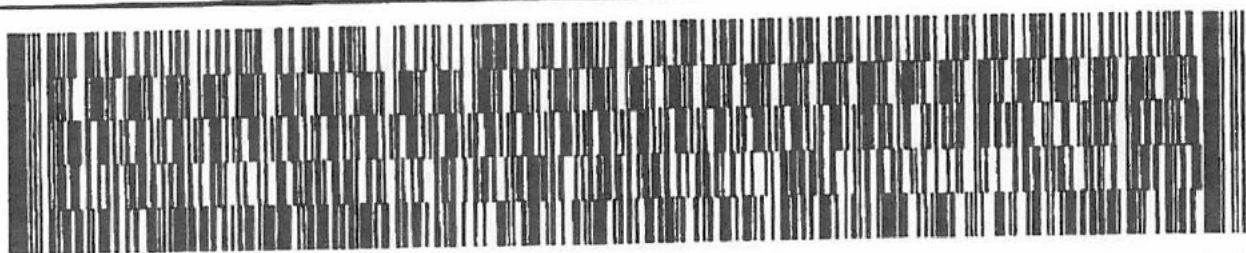
(language used)

I understand each and every question and instruction on this form, as translated to me by my interpreter, and have provided true and correct responses in the language indicated above.

Your Signature

Date (mm/dd/yyyy)

[Input fields for Signature, Date]



Part 14. Statement of Applicants Who Used an Interpreter (continued)

A- [Redacted] 5 1 8

Your Interpreter's Statement

I certify that I am fluent in English and [Redacted] (language used)

I further certify that I have read each and every question and instruction on this form, as well as the answer to each question, to this applicant in the above-mentioned language, and the applicant has informed me that he or she has understood each and every instruction and question on the form, as well as the answer to each question.

Interpreter's Printed Name

Family Name (Last Name) [Redacted] Given Name (First Name) [Redacted] Middle Name (if applicable) [Redacted]

Interpreter's Signature [Redacted] Date (mm/dd/yyyy) [Redacted]

Telephone Number ([Redacted]) [Redacted] - [Redacted]

NOTE: Do not complete Parts 15., 16., and 17. until the USCIS Officer instructs you to do so at the interview.

Part 15. Signature at Interview

I swear (affirm) and certify under penalty of perjury under the laws of the United States of America that I know that the contents of this Form N-400, Application for Naturalization, subscribed by me, including corrections number 1 through 3, are true and correct. The evidence submitted by me on numbered pages 1 through 21 is true and correct.

Subscribed to and sworn to (affirmed) before me

[Redacted] USCIS Officer's Printed Name or Stamp: Jeneta Miller Date (mm/dd/yyyy): 11/3/15

Applicant's Signature: [Redacted]

USCIS Officer's Signature: [Redacted]

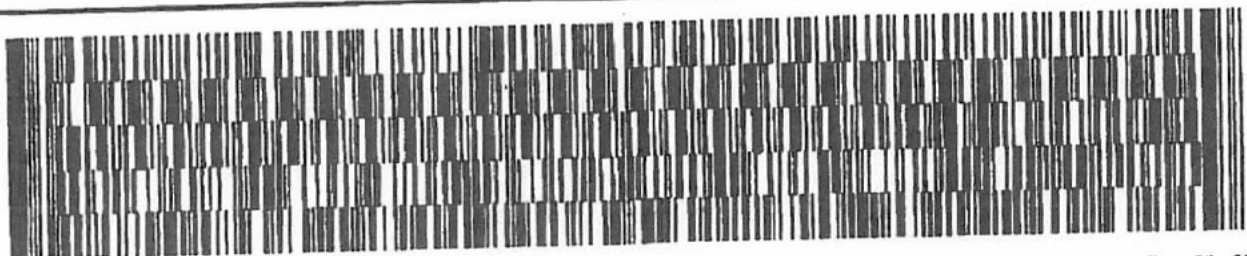


Exhibit G



No. 37676249

DEPARTMENT OF HOMELAND SECURITY

NATIONAL DIVISION

Personal description of holder
as of date of naturalization:

Date of birth: [REDACTED] 1986

Sex: FEMALE

Height: 5 feet 3 inches

Marital status: MARRIED

Country of former nationality:
CUBA

USCIS Registration No. [REDACTED] 518

I certify that the description given is true, and that the photograph affixed hereto is a likeness of me.

(Complete and true signature of holder)

Be it known that, pursuant to an application filed with the Secretary of Homeland Security,

at: MIAMI, FLORIDA

The Secretary having found that:

MILAGROS MARILEISIS ACOSTA TORRES
residing at: MIAMI, FLORIDA

having complied in all respects with all of the applicable provisions of the naturalization laws of the United States, being entitled to be admitted as a citizen of the United States, and having taken the oath of allegiance at a ceremony conducted by

U.S. CITIZENSHIP AND IMMIGRATION SERVICES

at: MIAMI, FLORIDA on: NOVEMBER 06, 2015

such person is admitted as a citizen of the United States of America.

San Abbing

U. S. Citizenship and Immigration Services

ALTERATION OR MISUSE OF THIS DOCUMENT IS A FEDERAL OFFENSE AND PUNISHABLE BY LAW

DEPARTMENT OF HOMELAND SECURITY