UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - - - - - - - - - - - - X
                                :
UNITED STATES OF AMERICA   :   SEALED SUPERSEDING INDICTMENT
                                :
        - v. -   :   (S4) 20 Cr.
                                :   20 CRIM 416
ALEX PEREIRA DE SOUTO,   :
                                :
        Defendant.   :
                                :
- - - - - - - - - - - - - - - - X

COUNT ONE
(Wire Fraud)

The Grand Jury charges:

1.   From at least in or about July 2018 up to and
including at least in or about February 2020, in the Southern
District of New York and elsewhere, ALEX PEREIRA DE SOUTO, the
defendant, willfully and knowingly, having devised and intending
to devise a scheme and artifice to defraud, and for obtaining
money and property by means of false and fraudulent pretenses,
representations, and promises, did transmit and cause to be
transmitted by means of wire, radio, and television
communication in interstate and foreign commerce, writings,
signs, signals, pictures, and sounds, for the purpose of
executing such scheme and artifice, to wit, the defendant
participated in a scheme that convinced several Brazilian
businesses, based on false representations related to arranging
large international loans, to wire millions of dollars to

purported third-party entities, including to one such entity's bank account in New York, New York, when, in fact, the perpetrators of the scheme, including SOUTO, controlled those companies and converted the Brazilian businesses' money to their personal use and benefit.

(Title 18, United States Code, Sections 1343 and 2.)

COUNT TWO
(Conspiracy to Commit Wire Fraud)

The Grand Jury further charges:

2.   From at least in or about July 2018 up to and including at least in or about February 2020, in the Southern District of New York and elsewhere, ALEX PEREIRA DE SOUTO, the defendant, and others known and unknown, willfully and knowingly, did combine, conspire, confederate, and agree together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

3.   It was a part and object of the conspiracy that ALEX PEREIRA DE SOUTO, the defendant, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings,

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signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

(Title 18, United States Code, Section 1349.)

FORFEITURE ALLEGATION

4. As a result of committing the offenses alleged in Counts One and Two of this Indictment, ALEX PEREIRA DE SOUTO, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

Substitute Asset Provision

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

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

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d.   has been substantially diminished in value; or

e.   has been commingled with other property which

    cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21,

United States Code, Section 853(p) and Title 28, United States

Code, Section 2461(c), to seek forfeiture of any other property

of the defendant up to the value of the forfeitable property

described above.

(Title 18, United States Code, Section 981;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)

FOREPERSON

AUDREY STRAUSS
Acting United States Attorney

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Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ALEX PEREIRA DE SOUTO,

Defendant.

SEALED SUPERSEDING INDICTMENT

S4 20 Cr.

(18 U.S.C. §§ 1343, 1349, and 2.)

AUDREY STRAUSS
Acting United States Attorney

████████████████████████
Foreperson