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ANGELA E. NOBLE
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: **19-20435 CR-GAYLES**

OTAZO-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(h))

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.

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;

- l. 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:

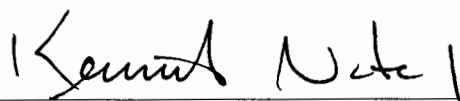
- a) cannot be located upon the exercise of due diligence;
- b) has been transferred or sold to, or deposited with, a third party;
- c) has been placed beyond the jurisdiction of the court;
- d) has been substantially diminished in value; or
- e) has been commingled with other property which cannot be 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

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO. _____

v.

MICHEL ALEU, et al.,

CERTIFICATE OF TRIAL ATTORNEY*

Superseding Case Information:

Defendants. _____/

Court Division: (Select One)

Miami Key West
 FTL WPB FTP

New defendant(s) Yes No
Number of new defendants _____
Total number of counts _____

- I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
- I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.
- Interpreter: (Yes or No) Yes
List language and/or dialect SPANISH
- This case will take 10 days for the parties to try.
- Please check appropriate category and type of offense listed below:

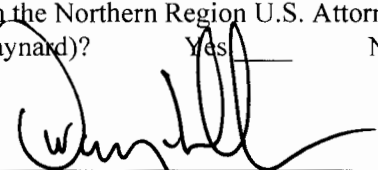
- (Check only one)
- I 0 to 5 days _____
 - II 6 to 10 days
 - III 11 to 20 days _____
 - IV 21 to 60 days _____
 - V 61 days and over _____

- (Check only one)
- Petty _____
 - Minor _____
 - Misdem. _____
 - Felony

- Has this case previously been filed in this District Court? (Yes or No) No
If yes: Judge Case No. _____
(Attach copy of dispositive order)
Has a complaint been filed in this matter? (Yes or No) No
If yes: Magistrate Case No. _____
Related miscellaneous numbers: _____
Defendant(s) in federal custody as of _____
Defendant(s) in state custody as of _____
Rule 20 from the District of _____

Is this a potential death penalty case? (Yes or No) No

- Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to August 9, 2013 (Mag. Judge Alicia O. Valle)? Yes No
- Does this case originate from a matter pending in the Northern Region U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)? Yes No


 DWAYNE E. WILLIAMS
 ASSISTANT UNITED STATES ATTORNEY
 Florida Bar No. 125199

*Penalty Sheet(s) attached

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: MICHEL ALEU

Case No: _____

Count #: 1

Conspiracy to Embezzle More than \$1,000 from a Tribal Gaming Establishment

Title 18, United States Code, Section 371

*** Max. Penalty:** Five (5) years' imprisonment

Count #: 8

Embezzlement of More Than \$1,000 from a Tribal Gaming Establishment

Title 18, United States Code, Section 1168(b)

*** Max. Penalty:** Twenty (20) years' imprisonment

Count #: 9

Conspiracy to Commit Computer Fraud

Title 18, United States Code, Section 1030(b)

*** Max. Penalty:** Five (5) years' imprisonment

Count #: 16

Computer Fraud

Title 18, United States Code, Section 1030(a)(4)

*** Max. Penalty:** Five (5) years' imprisonment

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Count #: 17

Conspiracy to Commit Money Laundering Offenses

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

*** Max. Penalty:** Twenty (20) years' imprisonment

Counts #: 21-26

Money Laundering

Title 18, United States Code, Section 1956(a)(1)(B)(i) and (ii)

*** Max. Penalty:** Twenty (20) years' imprisonment as to each count

Counts #: 49-52

Money Laundering

Title 18, United States Code, Section 1957

*** Max. Penalty:** Ten (10) years' imprisonment as to each count

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: MARIA DEL PILAR ALEU

Case No: _____

Count #: 17

Conspiracy to Commit Money Laundering Offenses

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

*** Max. Penalty:** Twenty (20) years' imprisonment

Counts #: 21-26

Money Laundering

Title 18, United States Code, Section 1956(a)(1)(B)(i) and (ii)

*** Max. Penalty:** Twenty (20) years' imprisonment as to each count

Counts #: 49-52

Money Laundering

Title 18, United States Code, Section 1957

*** Max. Penalty:** Ten (10) years' imprisonment as to each count

Count #: 63

False and Fraudulent Statement

Title 18, United States Code, Section 1001(a)(2)

*** Max. Penalty:** Five (5) years' imprisonment

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: LESTER LAVIN

Case No: _____

Count #: 1

Conspiracy to Embezzle More than \$1,000 from a Tribal Gaming Establishment

Title 18, United States Code, Section 371

*** Max. Penalty:** Five (5) years' imprisonment

Counts #: 4, 5, 7

Embezzlement of More Than \$1,000 from a Tribal Gaming Establishment

Title 18, United States Code, Section 1168(b)

*** Max. Penalty:** Twenty (20) years' imprisonment as to each count

Count #: 9

Conspiracy to Commit Computer Fraud

Title 18, United States Code, Section 1030(b)

*** Max. Penalty:** Five (5) years' imprisonment

Counts#: 12, 13, 15

Computer Fraud

Title 18, United States Code, Section 1030(a)(4)

*** Max. Penalty:** Five (5) years' imprisonment as to each count

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Count #: 18

Conspiracy to Commit Money Laundering Offenses

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

*** Max. Penalty:** Twenty (20) years' imprisonment

Counts #: 27-41

Money Laundering

Title 18, United States Code, Section 1956(a)(1)(B)(i) and (ii)

*** Max. Penalty:** Twenty (20) years' imprisonment as to each count

Counts #: 53-55

Money Laundering

Title 18, United States Code, Section 1957

*** Max. Penalty:** Ten (10) years' imprisonment as to each count

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: ANISLEYDI VERGEL HERMIDA

Case No: _____

Count #: 18

Conspiracy to Commit Money Laundering Offenses

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

*** Max. Penalty:** Twenty (20) years' imprisonment

Counts #: 27, 31, 34-36, 38-41

Money Laundering

Title 18, United States Code, Section 1956(a)(1)(B)(i) and (ii)

*** Max. Penalty:** Twenty (20) years' imprisonment as to each count

Counts #: 54-55

Money Laundering

Title 18, United States Code, Section 1957

*** Max. Penalty:** Ten (10) years' imprisonment as to each count

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: YOHANDER JORRIN MELHEN

Case No: _____

Count #: 1

Conspiracy to Embezzle More than \$1,000 from a Tribal Gaming Establishment

Title 18, United States Code, Section 371

*** Max. Penalty:** Five (5) years' imprisonment

Counts #: 2, 6, 8

Embezzlement of More Than \$1,000 from a Tribal Gaming Establishment

Title 18, United States Code, Section 1168(b)

*** Max. Penalty:** Twenty (20) years' imprisonment as to each count

Count #: 9

Conspiracy to Commit Computer Fraud

Title 18, United States Code, Section 1030(b)

*** Max. Penalty:** Five (5) years' imprisonment

Counts #: 10, 14, 16

Computer Fraud

Title 18, United States Code, Section 1030(a)(4)

*** Max. Penalty:** Five (5) years' imprisonment as to each count

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Count #: 19

Conspiracy to Commit Money Laundering Offenses

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

*** Max. Penalty:** Twenty (20) years' imprisonment

Counts #: 42-47

Money Laundering

Title 18, United States Code, Section 1956(a)(1)(B)(i) and (ii)

*** Max. Penalty:** Twenty (20) years' imprisonment as to each count

Counts #: 56-61

Money Laundering

Title 18, United States Code, Section 1957

*** Max. Penalty:** Ten (10) years' imprisonment as to each count

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: MILAGROS MARILE ACOSTA TORRES

Case No: _____

Count #: 19

Conspiracy to Commit Money Laundering Offenses

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

*** Max. Penalty:** Twenty (20) years' imprisonment

Counts #: 42-47

Money Laundering

Title 18, United States Code, Section 1956(a)(1)(B)(i) and (ii)

*** Max. Penalty:** Twenty (20) years' imprisonment as to each count

Counts #: 56-61

Money Laundering

Title 18, United States Code, Section 1957

*** Max. Penalty:** Ten (10) years' imprisonment as to each count

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: LEONARDO BETANCOURT

Case No: _____

Count #: 1

Conspiracy to Embezzle More than \$1,000 from a Tribal Gaming Establishment

Title 18, United States Code, Section 371

*** Max. Penalty:** Five (5) years' imprisonment

Counts #: 3, 4, 5

Embezzlement of More Than \$1,000 from a Tribal Gaming Establishment

Title 18, United States Code, Section 1168(b)

*** Max. Penalty:** Twenty (20) years' imprisonment as to each count

Count #: 9

Conspiracy to Commit Computer Fraud

Title 18, United States Code, Section 1030(b)

*** Max. Penalty:** Five (5) years' imprisonment

Counts #: 11-13

Computer Fraud

Title 18, United States Code, Section 1030(a)(4)

*** Max. Penalty:** Five (5) years' imprisonment as to each count

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Count #: 20

Conspiracy to Commit Money Laundering Offenses

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

*** Max. Penalty:** Twenty (20) years' imprisonment

Count #: 48

Money Laundering

Title 18, United States Code, Section 1956(a)(1)(B)(i) and (ii)

*** Max. Penalty:** Twenty (20) years' imprisonment

Count #: 62

Money Laundering

Title 18, United States Code, Section 1957

*** Max. Penalty:** Ten (10) years' imprisonment

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: YUSMARY SHIRLEY DURAN

Case No: _____

Count #: 20

Conspiracy to Commit Money Laundering Offenses

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

*** Max. Penalty:** Twenty (20) years' imprisonment

Count #: 48

Money Laundering

Title 18, United States Code, Section 1956(a)(1)(B)(i) and (ii)

*** Max. Penalty:** Twenty (20) years' imprisonment

Count #: 62

Money Laundering

Title 18, United States Code, Section 1957

*** Max. Penalty:** Ten (10) years' imprisonment

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**