

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

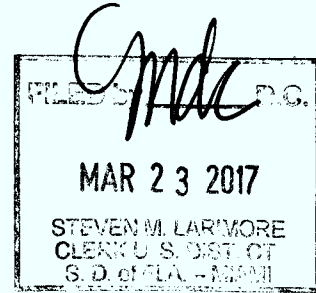
CASE NO. **17-20215** **CR-SCOLA**
18 U.S.C. § 1956(h)
18 U.S.C. § 982(a) **/OTAZO-REYES**

UNITED STATES OF AMERICA

v.

SAMER H. BARRAGE
RENATO J. RODRIGUEZ, and
JUAN P. GRANDA,
a/k/a "Flecha,"

Defendants.



INDICTMENT

The Grand Jury charges that:

COUNT 1
Conspiracy to Commit Money Laundering
(18 U.S.C. §1956(h))

Beginning in or around January 2013, and continuing through in or around March 2017, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

SAMER H. BARRAGE
RENATO J. RODRIGUEZ,
JUAN P. GRANDA, and
a/k/a "Flecha,"

did knowingly and willfully combine, conspire, confederate, and agree with each other and other persons known and unknown to the Grand Jury, to transport, transmit and transfer monetary instruments and funds from a place in the United States to or through a place outside the United States and to a place in the United States from or through a place outside the United States, with

the intent to promote the carrying on of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(2)(A).

It is further alleged that the specified unlawful activity is:

(a) The entry of goods by means of false statements, in violation of Title 18, United States Code, Section 542;

(b) An offense against a foreign nation, that is, the crime of illegal mining against the Republic of Peru, with respect to which the United States would be obligated to by a multilateral treaty, either to extradite the alleged offender or to submit the case for prosecution, if the offender were found within the territory of the United States;

(c) An offense against a foreign nation involving the manufacture, importation, sale, or distribution of a controlled substance (as such term is defined for the purpose of the Controlled Substances Act); and

(d) An offense against a foreign nation involving bribery of a public official, or the misappropriation, theft, or embezzlement of public funds by or for the benefit of a public official.

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

FORFEITURE ALLEGATIONS

1. The allegations of this Indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging criminal forfeiture to the United States of America of certain property in which the defendant, **SAMER H. BARRAGE, RENATO J. RODRIGUEZ, and JUAN P. GRANDA, a/k/a “Flecha,”** have an interest.

2. Upon conviction of a violation of Title 18, United States Code, Section 1956, or conspiracy to commit such violation, the defendant shall forfeit to the United States of America any property, real or personal, involved in such offense, and any property traceable to such property. All pursuant to Title 18, United States Code, Sections 982(a)(1), Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461(c). The property subject to forfeiture includes, but is not limited to, the following:

- a) Real property located at Malibu at Pacific Marlin in San Juan del Sur, Nicaragua;
- b) The contents of Suntrust Bank Account Number ending in 1504;
- c) The contents of Suntrust Bank Account Number ending in 1512;
- d) The contents of Suntrust Bank Account Number ending in 1520;
- e) The contents of Suntrust Bank Account Number ending in 7779; and
- f) entry of a forfeiture money judgment in an amount which represents a sum of money equal in value to any property, real or personal, involved in the commission of the violations alleged in this Indictment;

3. If the property described above as being subject to forfeiture, as a result of any act or omission of the defendants, **SAMER H. BARRAGE, RENATO J. RODRIGUEZ, and JUAN P. GRANDA, a/k/a “Flecha”**

- (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 subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants, including but not limited to the following:

- a) Real property located at 8460 SW 84 Terrace, Miami, FL 33143;
- b) Real property located at 16373 SW 76th Street, Miami, FL 33193;
- c) Fidelity Investments 401k Account in the name of Samer Barrage, ending in 3927; and
- d) One 2015 Porsche Macan Utility 4D, VIN # WP1AB2A58FLB71525, Florida plate PZ31Y.

All pursuant to Title 18, United States Code, Section 982(a)(1), Title 18, and the procedures set forth in Title 21, United States Code, Section 853, made applicable by Title 18, United States Code, Section 982(b) and Title 28, United States Code, Section 2461(c).

A TRUE BILL

FOREPERSON



BENJAMIN G. GREENBERG
ACTING UNITED STATES ATTORNEY



FRANCISCO R. MADERAL
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES OF AMERICA

CASE NO. _____

v.

SAMER BARRAGE, et al.

CERTIFICATE OF TRIAL ATTORNEY*

Defendants. /

Superseding Case Information:

Court Division: (Select One)

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

X Miami ___ Key West ___
 ___ FTL ___ WPB ___ FTP ___

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.
3. Interpreter: (Yes or No) No
 List language and/or dialect _____
4. This case will take 30 days for the parties to try.
5. Please check appropriate category and type of offense listed below:

(Check only one)		(Check only one)
I 0 to 5 days	_____	Petty _____
II 6 to 10 days	_____	Minor _____
III 11 to 20 days	_____	Misdem. _____
IV 21 to 60 days	<u>X</u>	Felony <u>X</u>
V 61 days and over	_____	

6. Has this case been previously filed in this District Court? (Yes or No) No

If yes: Judge: _____ Case No. _____
 (Attach copy of dispositive order)

Has a complaint been filed in this matter? (Yes or No) Yes

If yes: Magistrate Case No. 16-MJ-02376-GARBER; 17-MJ-02428-SIMONTON
 Related Miscellaneous numbers: _____
 Defendant(s) in federal custody as of March 16, 2017
 Defendant(s) in state custody as of _____
 Rule 20 from the _____ District of _____

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

7. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to October 14, 2003? ___ Yes X No

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


 Francisco R. Maderal
 ASSISTANT UNITED STATES ATTORNEY
 Florida Bar No. 0041481

*Penalty Sheet(s) attached

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: SAMER H. BARRAGE

Case No: _____

Count #: 1

Conspiracy to Commit Money Laundering

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

*Max. Penalty: 20 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: RENATO J. RODRIGUEZ

Case No: _____

Count #: 1

Conspiracy to Commit Money Laundering

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

***Max. Penalty:** 20 Years' Imprisonment

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: JUAN P. GRANDA, a.k.a., "Flecha"

Case No: _____

Count #: 1

Conspiracy to Commit Money Laundering

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

*Max. Penalty: 20 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.**