

Feb 20, 2018  
STEVEN M. LARIMORE  
CLERK U.S. DIST. CT.  
S.D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
**18-20108-CR-ALTONAGA/GOODMAN**  
Case No.

18 U.S.C. § 1956(h)  
18 U.S.C. § 982

UNITED STATES OF AMERICA

vs.

ARTURO ESCOBAR DOMINGUEZ,

Defendant.

\_\_\_\_\_ /

INFORMATION

The United States charges that:

CONSPIRACY TO COMMIT MONEY LAUNDERING  
(18 U.S.C. § 1956)

Beginning in or around December 2012, through in or around at least September 2014, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**ARTURO ESCOBAR DOMINGUEZ,**

did knowingly and willfully combine, conspire, confederate, and agree, with others known and unknown to the United States Attorney, to violate Title 18, United States Code, Section 1956, that is:

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

b. to transport, transmit and transfer funds to or through a place in the United States from a place outside the United States and from a place in the United States to or through a place outside the United States, knowing that the funds involved in the transportation, transmission and transfer represented the proceeds of some form of unlawful activity, and knowing that the transportation, transmission and transfer was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i).

It is further alleged that the specified unlawful activities are: (i) a violation of the Foreign Corrupt Practices Act (“FCPA”), in violation of Title 15, United States Code, Section 78dd-2; and (ii) an offense against a foreign nation involving bribery of a public official in violation of foreign law, specifically the Ecuadorian Penal Code, pursuant to Title 18, United States Code, Section 1956(c)(7)(B)(iv).

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

**FORFEITURE**  
**(18 U.S.C. § 982)**

1. The allegations contained in this Information are re-alleged and incorporated by reference as though fully set forth herein for the purpose of alleging forfeiture to the United States of certain property in which the defendant, **ARTURO ESCOBAR DOMINGUEZ**, has an interest.

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

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

Benjamin G. Greenberg  
BENJAMIN G. GREENBERG  
UNITED STATES ATTORNEY

By: [Signature]  
KAREN E. ROCHLIN  
ASSISTANT UNITED STATES ATTORNEY

SANDRA L. MOSER, ACTING CHIEF  
CRIMINAL DIVISION, FRAUD SECTION  
U.S. DEPARTMENT OF JUSTICE

By: [Signature]  
for LORINDA LARYEA, TRIAL ATTORNEY  
DAVID FUHR, TRIAL ATTORNEY  
CRIMINAL DIVISION, FRAUD SECTION

DEBORAH L. CONNOR, ACTING CHIEF  
CRIMINAL DIVISION, MONEY LAUNDERING  
& ASSET RECOVERY SECTION, U.S. DEPARTMENT OF JUSTICE

By: [Signature]  
for RANDALL WARDEN, TRIAL ATTORNEY  
MARY ANN MCCARTHY, TRIAL ATTORNEY  
CRIMINAL DIVISION, MONEY LAUNDERING  
& ASSET RECOVERY SECTION, U. S. DEPARTMENT OF JUSTICE

UNITED STATES OF AMERICA

CASE NO. \_\_\_\_\_

v.

ARTURO ESCOBAR DOMINGUEZ,

**CERTIFICATE OF TRIAL ATTORNEY\***

Defendant.

\_\_\_\_\_ /

**Superseding Case Information:**

**Court Division:** (Select One)

X  Miami \_\_\_\_\_ Key West  
\_\_\_\_\_ FTL \_\_\_\_\_ WPB \_\_\_\_\_ FTP

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

I do hereby certify that:

- 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  0  days for the parties to try.
- Please check appropriate category and type of offense listed below:

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

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 \_\_\_\_\_ No  X

  
 \_\_\_\_\_  
 KAREN E. ROCHLIN  
 ASSISTANT UNITED STATES ATTORNEY  
 COURT ID No. A5500050

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: ARTURO ESCOBAR DOMINGUEZ

Case No: \_\_\_\_\_

Count #: 1

Conspiracy to Commit Money Laundering

Title 18, United States Code, Section 1956

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

Count #: \_\_\_\_\_

**\*Max. Penalty:** \_\_\_\_\_

Count #: \_\_\_\_\_

**\*Max. Penalty:** \_\_\_\_\_

Count #: \_\_\_\_\_

**\*Max. Penalty:** \_\_\_\_\_

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

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

UNITED STATES DISTRICT COURT  
for the  
Southern District of Florida

United States of America

v.

ARTURO ESCOBAR DOMINGUEZ

*Defendant*

)  
)  
)  
)  
)

Case No.

**WAIVER OF AN INDICTMENT**

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

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

Date: \_\_\_\_\_

\_\_\_\_\_  
*Defendant's signature*

\_\_\_\_\_  
*Signature of defendant's attorney*

\_\_\_\_\_  
*Printed name of defendant's attorney*

\_\_\_\_\_  
*Judge's signature*

\_\_\_\_\_  
*Judge's printed name and title*