

Page 1 of 20  
ELECTRONIC  
D.C.  
OCT 11, 2007  
CLARENCE MADDOX  
CLERK U.S. DIST. CT.  
S.D. OF FLA. - MIAMI

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
07-20815-CR-JORDAN/TORRES**  
Case No.

18 U.S.C. § 1349  
18 U.S.C. § 1347  
18 U.S.C. § 2  
18 U.S.C. § 1956(h)  
18 U.S.C. § 1956(a)(1)(B)(i)

**UNITED STATES OF AMERICA**

vs.

**ANGEL CASTILLO, JR.,  
MIGUEL A. CASTILLO,  
JAVIER ROBERTO MORE,  
GIOVANNI GUERRERO, and  
MICHAEL LABRADA,**

**Defendants.**

**INDICTMENT**

The Grand Jury charges that:

**GENERAL ALLEGATIONS**

At all times relevant to this Indictment:

**The Medicare Program**

1. The Medicare Program (“Medicare”) was a federally funded program that provided health care benefits to certain individuals, primarily the elderly, blind, and disabled. The benefits available under Medicare were governed by federal statutes and regulations. The United States Department of Health and Human Services (“HHS”), through its agency, the Centers for Medicare and Medicaid Services (“CMS”), oversaw and administered Medicare. Individuals who received benefits under Medicare were commonly referred to as Medicare “beneficiaries.”

2. Medicare was a “health care benefit program,” as defined by Title 18, United States Code, Section 24(b).

3. Part B of the Medicare Program was a medical insurance program that covered, among other things, certain physician and outpatient services, and other health care benefits, items, and services, including durable medical equipment (“DME”), that were medically necessary and ordered by licensed medical doctors or other qualified health care providers. DME is equipment that is designed for a specific medical purpose and for repeated use, such as wound care supplies, knee braces, prosthetic limbs, back braces, wrist braces, and wheelchairs.

4. For Florida Medicare beneficiaries, Palmetto Government Benefits Administrators (“Palmetto GBA”), had a contract with HHS to receive, process and pay claims by Medicare beneficiaries for reimbursement for the cost of DME and related health care benefits, items, or services supplied or provided to such beneficiaries.

#### **Medicare Billing and Payment Procedures**

5. A DME company that sought to participate in Medicare Part B and bill Medicare for the cost of DME and related benefits, items, and services was required to apply for and receive a “supplier number.” The supplier number allowed a DME company to submit bills, known as “claims,” to Medicare to obtain reimbursement for the cost of DME and related health care benefits, items, and services that a DME company had supplied or provided to beneficiaries.

6. To receive payment from Medicare, a DME company, using its supplier number, would submit a health insurance claim form, known as a CMS-1500. Medicare permitted DME companies to submit a CMS-1500 electronically or by way of a paper claim form. Each claim form required certain important information, including: (a) the Medicare beneficiary’s name and

identification number; (b) the identification number of the doctor or other qualified health care provider who ordered the health care benefit, item, or service that was the subject of the claim; (c) the health care benefit, item, or service that was provided or supplied to the beneficiary; (d) the billing codes for the benefit, item, or service; and (e) the date upon which the benefit, item, or service was provided or supplied to the beneficiary.

7. Medicare, through Palmetto GBA, generally would pay a substantial portion of the cost of the DME or related health care benefits, items, and services that were medically necessary and ordered by licensed doctors or other qualified health care providers.

**Virgo Medical Equipment & Supplies, Inc.**

8. Virgo Medical Equipment & Supplies, Inc. (hereinafter “Virgo”) was a Florida corporation that was incorporated on or about January 10, 2003, and was located in Miami-Dade County at 11117 West Okeechobee Road, Unit #123, Hialeah Gardens, Florida, 33018.

9. On or about November 29, 2004, Virgo obtained a Medicare supplier number 4953640001 and was thus authorized to submit claims to Medicare to be reimbursed for DME-related benefits, items, and services. From in or around August 2005, through in or around January 2006, Virgo purported to be a legitimate DME business and submitted approximately \$3,600,000 in claims to Medicare, seeking reimbursement for DME-related items and services that Virgo supposedly had provided to Medicare beneficiaries. In response to these claims, Medicare paid Virgo approximately \$516,363.

**S.Y.C. Home Medical Equipment, Inc.**

10. S.Y.C. Home Medical Equipment, Inc. (hereinafter "SYC") was a Florida corporation that was incorporated on or about May 8, 1992, and was located in Miami-Dade County at 13367 Southwest 42<sup>nd</sup> Street, Miami, Florida, 33175.

11. On or about January 10, 2006, SYC obtained a Medicare supplier number 0800410001 and was thus authorized to submit claims to Medicare to be reimbursed for DME-related benefits, items, and services. From in or around January 2006 through in or around October 2006, SYC purported to be a legitimate DME business and submitted approximately \$7,917,209 in claims to Medicare, seeking reimbursement for DME-related items and services that SYC supposedly had provided to Medicare beneficiaries. In response to these claims, Medicare paid SYC approximately \$1,862,145.

**The Defendants**

12. Defendant **ANGEL CASTILLO, JR.** controlled and operated Virgo and SYC beginning in or around August 2005 and continuing through in or around October 2006.

13. Defendant **MIGUEL A. CASTILLO** assisted **ANGEL CASTILLO, JR.** in the operation of Virgo and SYC.

14. Defendant **JAVIER ROBERTO MORE** was the owner of record of Virgo from in or around August 2005 and continuing through in or around September 2006.

15. Defendant **GIOVANNI GUERRERO** assisted **ANGEL CASTILLO, JR.** in the operation of Virgo and SYC.

16. Defendant **MICHAEL LABRADA** assisted **ANGEL CASTILLO, JR.** in the operation of Virgo and SYC.

**COUNT 1**  
**CONSPIRACY TO COMMIT HEALTH CARE FRAUD**  
**(18 U.S.C. § 1349)**

1. Paragraphs 1 through 16 of the General Allegations section of this Indictment are realleged and incorporated by reference as though fully set forth herein.

2. From in or around August 2005, and continuing through in or around October 2006, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**ANGEL CASTILLO, JR.,**  
**MIGUEL A. CASTILLO,**  
**JAVIER ROBERTO MORE, and**  
**GIOVANNI GUERRERO,**

did knowingly and willfully combine, conspire, confederate and agree with each other, and with persons known and unknown to the Grand Jury, to violate Title 18, United States Code, Section 1347, that is, to execute a scheme and artifice to defraud a health care benefit program affecting commerce, as defined in Title 18, United States Code, Section 24(b), that is, Medicare, and to obtain, by means of materially false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of, said health care benefit program, in connection with the delivery of and payment for health care benefits, items, and services.

**Purpose of the Conspiracy**

3. It was the purpose of the conspiracy for the defendants and their co-conspirators to unlawfully enrich themselves by, among other things: (a) submitting and causing the submission of false and fraudulent claims to Medicare; (b) concealing the submission of false and fraudulent claims to Medicare; and (c) diverting fraud proceeds for the personal use and benefit of the defendants, their co-conspirators, and others.

**Manner and Means Used to Accomplish the Conspiracy**

The manner and means by which the defendants and their co-conspirators sought to accomplish the object and purpose of the conspiracy included, but were not limited to, the following:

4. In or around August 2005, **GIOVANNI GUERRERO** recruited **JAVIER ROBERTO MORE** as a nominee or “straw” owner for **ANGEL CASTILLO, JR.**

5. On or about August 16, 2005, **ANGEL CASTILLO, JR.** installed **JAVIER ROBERTO MORE** as a nominee owner of Virgo.

6. On or about August 20, 2005, at the direction of **ANGEL CASTILLO, JR.**, **JAVIER ROBERTO MORE** opened and became the sole signatory on a Virgo bank account at Union Planters Bank, account number xxxxxxxx8393.

7. On or about December 20, 2005, **ANGEL CASTILLO, JR.** installed Juan A. Zaragoza (hereinafter “Zaragoza”) as a nominee owner of SYC.

8. On or about December 28, 2005, at the direction of **ANGEL CASTILLO, JR.**, Zaragoza became the sole signatory on an existing SYC bank account at Bank of America, account number xxxxxxxx9113.

9. In or around May 2006, **GIOVANNI GUERRERO** recruited Angel Hernandez Quesada (hereinafter “Quesada”) as a nominee or “straw” owner for **ANGEL CASTILLO, JR.**

10. On or about June 1, 2006, **ANGEL CASTILLO, JR.** installed Quesada in place of Zaragoza as the nominee owner of SYC.

11. On or about June 28, 2006, at the direction of **ANGEL CASTILLO, JR.**, Quesada opened and became the sole signatory on a second SYC bank account at Bank of America, account number xxxxxxxx4454.

12. On or about July 13, 2006, **ANGEL CASTILLO, JR.** re-installed Zaragoza as the nominee owner of SYC in place of Quesada.

13. On or about August 18, 2006, at the direction of **ANGEL CASTILLO, JR.**, Zaragoza opened and became the sole signatory on an SYC bank account at Washington Mutual Bank, account number xxxxxxxx8613-1.

14. From in or around August 2005 and continuing through in or around October 2006, **ANGEL CASTILLO, JR.** and his co-conspirators caused Virgo and SYC to submit approximately \$11,500,000 of Medicare claims for DME-related reimbursement, such claims falsely and fraudulently representing that DME items and services were medically necessary and/or had been provided to Medicare beneficiaries. In truth and in fact, the claims submitted to Medicare were false and fraudulent because, among other things: the doctors who allegedly ordered the DME items and services had not treated the Medicare beneficiaries; the doctors had not ordered the items and services; and the DME items and services had not been provided to the Medicare beneficiaries.

15. As a result of such false and fraudulent claims, Medicare made payments to Virgo in the approximate amount of \$513,363, and the majority of such payments were deposited electronically into Virgo's bank account at Union Planters Bank.

16. As a result of such false and fraudulent claims, Medicare made payments to SYC in the approximate amount of \$1,862,145, and the majority of such payments were deposited into SYC's bank accounts at Bank of America and Washington Mutual Bank.

17. **ANGEL CASTILLO, JR., MIGUEL A. CASTILLO**, and their co-conspirators transferred and disbursed, and caused the transfer and disbursement of, monies in the Virgo account and the three SYC's accounts to themselves and others.

18. To conceal or disguise proceeds of the billing fraud scheme, **ANGEL CASTILLO, JR.** caused the preparation of numerous checks, drawn on the bank accounts of Virgo and SYC, and made payable to various payees, including, but not limited to, **MIGUEL A. CASTILLO, JAVIER ROBERTO MORE, GIOVANNI GUERRERO** and **MICHAEL LABRADA**. At the direction of **ANGEL CASTILLO, JR., MIGUEL A. CASTILLO**, and their co-conspirators, the checks were cashed and/or deposited at Union Planters Bank, Bank of America and Washington Mutual Bank by various individuals including, but not limited to, **MIGUEL A. CASTILLO, JAVIER ROBERTO MORE, GIOVANNI GUERRERO** and **MICHAEL LABRADA**.

All in violation of Title 18, United States Code, Section 1349.

**COUNTS 2-10**  
**HEALTH CARE FRAUD**  
**(18 U.S.C. §§ 1347 and 2)**

1. Paragraphs 1 through 16 of the General Allegations section of this Indictment are realleged and incorporated as though fully set forth herein.

2. From in or around August 2005, and continuing through in or around October 2006, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**ANGEL CASTILLO, JR., and**  
**JAVIER ROBERTO MORE,**

in connection with the delivery of and payment for health care benefits, items, and services, did knowingly and willfully execute, and attempt to execute, a scheme and artifice to defraud Medicare, a health care benefit program affecting commerce, as defined by Title 18, United States Code, Section 24(b), and to obtain, by means of materially false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of, Medicare, that

is, the defendants caused Virgo Medical Equipment & Supplies, Inc., and S.Y.C. Home Medical Equipment, Inc., to submit false and fraudulent claims to Medicare, seeking reimbursement for the cost of various DME items and services.

**Purpose of the Scheme and Artifice**

3. It was the purpose of the conspiracy for the defendants and their co-conspirators to unlawfully enrich themselves by, among other things: (a) submitting and causing the submission of false and fraudulent claims to Medicare; (b) concealing the submission of false and fraudulent claims to Medicare; and (c) diverting fraud proceeds for the personal use and benefit of the defendants, their co-conspirators, and others.

**The Scheme and Artifice**

4. The allegations in paragraphs 4 through 18 of the Manner and Means section of Count 1 of this Indictment are realleged and incorporated by reference as though fully set forth herein as a description of the scheme and artifice.

**Acts in Execution or Attempted Execution of the Scheme and Artifice**

5. On or about the dates set forth as to each count below, in Miami-Dade County, in the Southern District of Florida, and elsewhere, **ANGEL CASTILLO, JR.**, and **JAVIER ROBERTO MORE**, in connection with the delivery of and payment for health care benefits, items, and services, did knowingly and willfully execute, and attempt to execute, the above-described scheme and artifice to defraud a health care benefit program affecting commerce, that is Medicare, and to obtain, by means of materially false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of said health care benefit program:

Count	Medicare Beneficiary	Approximate Date of Service	Approximate Date of Claim	Items; Approx. Amount Billed; Product code	Defendant(s)
2	M.F.	09/19/2005	10/10/2005	collagen dressing; \$630; A6024	ANGEL CASTILLO, JR. and ROBERTO JAVIER MORE
3	R.E.	11/22/2005	11/25/2005	collagen dressing; \$630; A6024	ANGEL CASTILLO, JR. and ROBERTO JAVIER MORE
4	C.G.	10/19/2005	10/20/2005	hydrogel dressing; \$1200; A6247	ANGEL CASTILLO, JR. and ROBERTO JAVIER MORE
5	J.G.	10/28/2005	11/18/2005	hydrogel dressing; \$1200; A6247	ANGEL CASTILLO, JR. and ROBERTO JAVIER MORE
6	G.H.	05/19/2006	07/11/2006	pressure support ventilator; \$1,406; E0463	ANGEL CASTILLO, JR.
7	J.R.	05/08/2006	06/21/2006	manual wheelchair; \$2,366; E1161	ANGEL CASTILLO, JR.
8	C.K.	05/15/2006	07/11/2006	segmental pneumatic appliance; \$323; E0667	ANGEL CASTILLO, JR.
9	E.L.	05/19/2006	06/21/2006	pressure support ventilator; \$1,406; E0463	ANGEL CASTILLO, JR.
10	E.L.	07/19/2006	07/19/2006	pressure support ventilator; \$1,406; E0463	ANGEL CASTILLO, JR.

In violation of Title 18, United States Code, Sections 1347 and 2.

**COUNT 11**  
**CONSPIRACY TO COMMIT MONEY LAUNDERING**  
**(18 U.S.C. § 1956(h))**

From in or around August 2005, and continuing through in or around October 2006, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**ANGEL CASTILLO, JR.,**  
**MIGUEL A. CASTILLO,**  
**GIOVANNI GUERRERO, and**  
**MICHAEL LABRADA,**

did willfully, that is, with the intent to further the object of the conspiracy, and knowingly combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to commit a violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), that is: to knowingly conduct a financial transaction involving the proceeds of specified unlawful activity, knowing that the property involved in such 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, location, source, ownership, and control of the proceeds of specified unlawful activity.

It is further alleged that the specified unlawful activity is health care fraud, in violation of Title 18, United States Code, Section 1347.

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

**COUNTS 12-22**  
**(Money Laundering: 18 U.S.C. §§ 1956(a)(1)(B)(i) and 2)**

On or about the dates set forth below, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**ANGEL CASTILLO, JR.,  
MIGUEL A. CASTILLO,  
GIOVANNI GUERRERO, and  
MICHAEL LABRADA,**

did knowingly conduct and attempt to conduct a financial transaction involving the proceeds of specified unlawful activity, knowing that the property involved in such 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, location, source, ownership, and control of the proceeds of specified unlawful activity.

Count	Defendant(s)	Approximate Date of Transaction	Description of Financial Transaction
12	ANGEL CASTILLO, JR. and GIOVANNI GUERRERO	11-23-05	The cashing by GIOVANNI GUERRERO of check number 306 in the amount of \$3,685.70, drawn on Virgo's Union Planters Bank account xxxxxxxx8393.
13	ANGEL CASTILLO, JR. and GIOVANNI GUERRERO	01-09-06	The cashing by GIOVANNI GUERRERO of check number 368 in the amount of \$3,708.44, drawn on Virgo's Union Planters Bank account xxxxxxxx8393.
14	ANGEL CASTILLO, JR. and MIGUEL A. CASTILLO	01-26-06	The cashing by MIGUEL A. CASTILLO of check number 409 in the amount of \$3,822.36, drawn on Virgo's Union Planters Bank account xxxxxxxx8393.
15	ANGEL CASTILLO, JR. and GIOVANNI GUERRERO	03-20-06	The cashing by GIOVANNI GUERRERO of check number 1088 in the amount of \$2,230.64, drawn on SYC Bank of America account xxxxxxxx9113.

Count	Defendant(s)	Approximate Date of Transaction	Description of Financial Transaction
16	ANGEL CASTILLO, JR. and MIGUEL A. CASTILLO	07-06-2006	The cashing by <b>MIGUEL A. CASTILLO</b> of check number 141 in the amount of \$3,490.16 drawn on SYC Bank of America account xxxxxxxx9113.
17	ANGEL CASTILLO, JR.	07-20-06	The withdrawal of funds from SYC's Bank of America account number xxxxxxxx9113, by way of the cashing of cashier's check number 4827993 made payable to "Mayor Jeweler", in the amount of \$33,000.
18	ANGEL CASTILLO, JR. and MIGUEL A. CASTILLO	07-27-06	The withdrawal of funds from SYC's Bank of America account number xxxxxxxx9113, by way of a Bank of America debit slip in the amount of \$80,000.
19	ANGEL CASTILLO, JR. and MIGUEL A. CASTILLO	08-04-06	The withdrawal of funds from SYC's Bank of America account number xxxxxxxx9113, by way of the cashing of check number 168 made payable to Angel Hernandez, in the amount of \$100,000.
20	ANGEL CASTILLO, JR.	09-14-06	The withdrawal of funds from SYC's Washington Mutual Bank account number xxxxxxxx8613-1, by way of Washington Mutual Bank withdrawal slip number 0008583015 payable to Juan A. Zaragoza, in the amount of \$50,000.
21	ANGEL CASTILLO, JR. and MICHAEL LABRADA	01-05-06	The cashing by <b>MICHAEL LABRADA</b> of check number 343 in the amount of \$3,365.75, drawn on Virgo's Union Planters Bank account xxxxxxxx8393.
22	ANGEL CASTILLO, JR. and MICHAEL LABRADA	09-13-06	The cashing by <b>MICHAEL LABRADA</b> of check number 108 in the amount of \$3,288.25 drawn on SYC Washington Mutual Bank account xxxxxxxx8613-1.

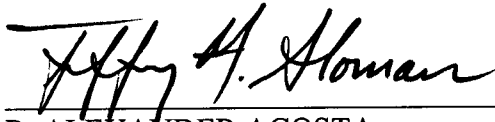
It is further alleged that the specified unlawful activity is health care fraud, in violation of Title 18, United States Code, Section 1347.

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

A TRUE BILL

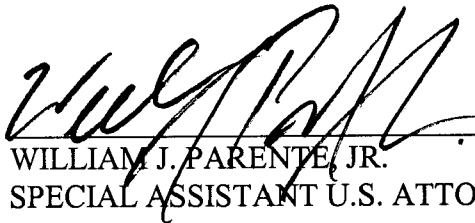
FOREPERSON

10/11/07



for

R. ALEXANDER ACOSTA  
UNITED STATES ATTORNEY



WILLIAM J. PARENTE, JR.  
SPECIAL ASSISTANT U.S. ATTORNEY

UNITED STATES OF AMERICA

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

vs.

**CERTIFICATE OF TRIAL ATTORNEY\***

ANGEL CASTILLO, JR., et al.,  
Defendants.

**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:

- 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 10 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	<u>X</u>	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 U.S. Attorney's Office prior to April 1, 2003? \_\_\_\_\_ Yes X No
- 8. Does this case originate from a matter pending in the U. S. Attorney's Office prior to April 1, 1999? \_\_\_\_\_ Yes X No  
If yes, was it pending in the Central Region? \_\_\_\_\_ Yes \_\_\_\_\_ No
- 9. 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
- 10. Does this case originate from a matter pending in the Narcotics Section (Miami) prior to May 18, 2003? \_\_\_\_\_ Yes X No
- 11. 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

  
WILLIAM J. PARENTE, JR.  
SPECIAL ASSISTANT UNITED STATES ATTORNEY  
COURT ID# A550975

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: ANGEL CASTILLO, JR

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

Count #: 1  
Conspiracy To Commit Health Care Fraud

18 U.S.C. § 1349

**\* Max. Penalty:** 10 years' imprisonment

Counts #: 2-10  
Health Care Fraud

18 U.S.C. § 1347

**\*Max. Penalty:** 10 years' imprisonment as to each count

Count #: 11  
Money Laundering Conspiracy

18 U.S.C. § 1956(h)

**\*Max. Penalty:** 20 years' imprisonment

Counts #: 12-22  
Money Laundering

18 U.S.C. § 1956(a)(1)(B)(i)

**\*Max. Penalty:** 20 years' imprisonment as to each count

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.**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: MIGUEL A. CASTILLO

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

Count #: 1  
Conspiracy To Commit Health Care Fraud

18 U.S.C. § 1349

**\* Max. Penalty:** 10 years' imprisonment

Count #: 11  
Money Laundering Conspiracy

18 U.S.C. § 1956(h)

**\*Max. Penalty:** 20 years' imprisonment as to each count

Counts #:14, 16, 18  
and 19 Money Laundering Conspiracy

18 U.S.C. § 1956(a)(1)(B)(i)

**\*Max. Penalty:** 20 years' imprisonment as to each count

Counts #:  
\_\_\_\_\_  
\_\_\_\_\_

**\*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.**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: JAVIER ROBERTO MORE

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

Count #: 1  
Conspiracy to Commit Health Care Fraud

18 U.S.C. § 1349

**\* Max. Penalty:** 10 years' imprisonment

Counts # 2 - 5  
Health Care Fraud

18 U.S.C. § 1347

**\*Max. Penalty:** 10 years' imprisonment

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.**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: GIOVANNI GUERRERO

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

Count #: 1  
Conspiracy To Commit Health Care Fraud

18 U.S.C. § 1349

**\* Max. Penalty:** 10 years' imprisonment

Count #: 11  
Money Laundering Conspiracy

18 U.S.C. § 1956(h)

**\*Max. Penalty:** 20 years' imprisonment

Counts #: 12,13  
and 15 Money Laundering Conspiracy

18 U.S.C. § 1956(a)(1)(B)(i)

**\*Max. Penalty:** 20 years' imprisonment as to each count

Counts #: \_\_\_\_\_

**\*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.**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: MICHAEL LABRADA

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

Count #: 11

Money Laundering Conspiracy

18 U.S.C. § 1956(h)

**\* Max. Penalty** 20 years' imprisonment

Counts #: 21 and 22

Money Laundering

18 U.S.C. § 1956(a)(1)(B)(I)

**\* Max. Penalty** 20 years' imprisonment as to each count

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.**