

THE GRAND JURY CHARGES THAT:

Certain Relevant Persons and Entities

1. CARLOS A. RAFAEL (“RAFAEL”) is an individual living in Dartmouth, Massachusetts.
2. ANTONIO M. FREITAS (“FREITAS”) is an individual living in Taunton, Massachusetts. FREITAS is a Sheriff’s Deputy, employed by the Bristol County Sheriff’s Office.
3. Carlos Seafood, Inc., a commercial fishing business, is a Massachusetts corporation with its principal place of business in New Bedford, Massachusetts. Carlos Seafood is a federally permitted fish dealer. RAFAEL owns 100% of Carlos Seafood. RAFAEL also owns, wholly or in part, approximately 32 fishing vessels, through independent corporate shells. Each vessel is federally permitted for commercial fishing and, overall, RAFAEL owns approximately 44 permits. Taken as a whole, RAFAEL owns one of the largest commercial fishing concerns in the United States.
4. Person A and Person B are individuals employed by Carlos Seafood. Person C is an individual who owns a wholesale fish business in New York, New York. Person D is an individual living in Peabody, Massachusetts.

General Allegations Concerning the Regulation of Commercial Fishing

5. The National Oceanic and Atmospheric Administration (“NOAA”) is a federal agency within the U.S. Department of Commerce that, among other things, regulates the use and protection of ocean and coastal resources.
6. Commercial fishing is a highly regulated industry. Operators of fishing vessels must comply with various restrictions on fishing areas, seasonal access, gear usage, and with

federal limits on the quantity or weight of fish they catch, that is, species quotas. NOAA, under authority granted by the Magnuson-Stevens Fishery Conservation and Management Act, sets quotas and catch limits for commercial fishing vessels operating out of ports in the United States. These quotas are monitored and adjusted over time, with the goal of ensuring a sustainable fishery for a particular species.

7. Because it is difficult to monitor what happens at sea, commercial fishing vessels are required to comply with various self-reporting requirements. One of these is that vessels must complete a Fishing Vessel Trip Report (“trip report”) at the end of each fishing trip. The trip report requires, among other things, the date, the vessel name, all species caught on that trip and the weight of each catch. Vessel captains are required to sign trip reports under penalty of perjury and mail them to NOAA. Each trip report has a unique number assigned to it.
8. Federally permitted commercial fishing vessels must only sell their catch to federally permitted fish dealers. Under the federal regulatory scheme, it is possible for a person to own both a corporate entity that is an authorized dealer and also own federally permitted fishing vessels.
9. NOAA requires all dealers to submit, on a weekly basis, electronic reports (“dealer reports”) detailing information about the fish they buy from incoming fishing vessels. To submit reports the dealer must log onto a NOAA website, using a unique user name and password, and enter the data. Dealer reports include data about the date a catch was landed, the name of the vessel that brought it in, the grade, species, price and weight of the fish, and the number of the trip report that corresponds to the catch. Among other

things, NOAA uses the dealer reports as an independent check on the information vessels submit on trip reports.

General Allegations Concerning the Conspiracy Charged in Count One

Objectives

10. A major purpose and objective of the conspiracy charged in Count One was to evade federal fishing quotas for certain species of fish by falsifying trip and dealer reports submitted to the federal government and profit from the sale of the misreported fish.

Manner and Means

11. The manner and means by which the conspirators accomplished the goals of the conspiracy included, among others, the following:
 - a. RAFAEL, through Carlos Seafood and on a daily basis, bought fish from incoming fishing vessels and then resold that fish to third parties.
 - b. Often in coordination with Person A and the captain of an incoming fishing vessel RAFAEL owned, RAFAEL arranged for the vessel's trip report to falsely state having caught a certain amount of high-quota, and so cheaper fish, such as haddock, instead of accurately reporting having caught fish subject to strict quotas, and so more expensive, such as grey sole.
 - c. RAFAEL, through Carlos Seafood, then bought the catch from that incoming vessel, recording on the paperwork for that purchase the same false information about the fish species.
 - d. RAFAEL, through Carlos Seafood, sold that fish to third parties, including to a wholesale fish business in New York, New York, owned by Person C. Person C paid RAFAEL in lump sums, periodically driving to Massachusetts and

Connecticut to give him bags containing hundreds of thousands of dollars in cash. RAFAEL paid down the lump sum over the ensuing months in installments of fish, transported to Person C almost daily, from Massachusetts to New York, by a trucking service hired by Carlos Seafood.

- e. Each week RAFAEL, through Carlos Seafood and with the assistance of Person B, electronically submitted to NOAA a dealer report containing the same false fish species information contained in the corresponding trip reports.

Overt Acts in Furtherance of the Conspiracy

12. Between at least in or about 2012, through January 2016, RAFAEL routinely falsely reported to NOAA the species of fish caught by his fishing vessels, in an effort to show that his vessels had caught fish subject to high quotas, when in reality they had caught fish subject to stricter quotas. By evading strict quotas RAFAEL was able to catch additional fish without having to buy additional quota from neighboring fishing sectors, and profited from selling the misreported fish to third parties.
13. For example,
 - a. On or about January 25, 2016, the FV Hera II, a boat owned by RAFAEL through a shell corporation, landed a catch at New Bedford, Massachusetts. As reported to NOAA on that vessel's trip report for that trip, and as listed on Carlos Seafood's invoice for what it bought from the FV Hera II that day, the vessel landed 4595 pounds of haddock that it then sold to Carlos Seafood.
 - b. In turn, on or about January 29, 2016, from the office of Carlos Seafood in New Bedford, Massachusetts, RAFAEL, or someone working at his direction, electronically filed a dealer report with NOAA stating that, on January 25, 2016,

Carlos Seafood received, among other fish, 4595 pounds of haddock from the FV Hera II.

- c. But as RAFAEL knew at the time it was entered, the dealer report was false: the FV Hera II actually landed, and RAFAEL received from it, 4595 pounds of American plaice (“dabs”), a fish subject to stricter quotas than haddock. Carlos Seafood’s sales to third parties for January 25, 2016, reflect this as well: Carlos Seafood only sold about 200 pounds of haddock – not 4595 – while it sold 5200 pounds of dabs, having reported acquiring only 840 pounds of that fish that day.
- d. Some or all of the falsely reported fish, which had a market value of more than \$350, was sold to Person C in New York and transported there from Massachusetts.

14. As another example,

- a. On or about January 10, 2013, the FV Southern Crusader II, a boat owned by RAFAEL through a shell corporation, landed a catch at New Bedford, Massachusetts. As reported to NOAA on that vessel’s trip report for that trip, it landed 5000 pounds of haddock that day of which, according to Carlos Seafood’s records and other records, Carlos Seafood bought 4500 pounds.
- b. In turn, on or about January 19, 2013, from the office of Carlos Seafood in New Bedford, Massachusetts, RAFAEL, or someone working at his direction, electronically filed a dealer report with NOAA stating that, on January 10, 2013, Carlos Seafood received 4500 pounds of haddock from the FV Southern Crusader II.

- c. But as RAFAEL knew at the time it was entered, the dealer report was false: the FV Southern Crusader II actually landed, and RAFAEL received from it, 4500 pounds of yellowtail, a fish subject to stricter quotas than haddock. Carlos Seafood's sales to third parties for January 10, 2013, reflect this as well: it sold no haddock, having reported acquiring 4500 pounds, and sold 4500 pounds of yellowtail to Person C in New York, having reported acquiring none.
 - d. The falsely reported fish, which had a market value of more than \$350, was then transported from Massachusetts to Person C in New York.
- 15. On a yearly basis, RAFAEL's routine falsifications of dealer reports he submitted to NOAA created substantial discrepancies between the fishing activity he reported and the fish caught by his fishing vessels and acquired by Carlos Seafood.
 - a. For example, in 2015 RAFAEL reported on his dealer reports that he acquired from fishing vessels 154,118 pounds of dabs, a fish subject to relatively strict quotas. In reality he acquired about 314,903 pounds of dabs, leaving about 160,785 pounds falsely reported as something else. Conversely, in that same year RAFAEL reported on his dealer reports that he acquired 446,675 pounds of haddock. In reality he acquired only about 124,639 pounds, meaning that RAFAEL over-reported his fishing vessels' haddock catch by about 300,000 pounds. Overall, in 2015, RAFAEL acquired and sold approximately 432,536 pounds of fish that he falsely reported to NOAA as another kind of fish.
 - b. As another example, in 2014 RAFAEL reported on his dealer reports that he acquired from fishing vessels 23,475 pounds of witch flounder ("grey sole"), another fish subject to relatively strict quotas. In reality he acquired about 96,280

pounds of grey sole, leaving about 72,805 pounds falsely reported as something else. Conversely, in the same year RAFAEL reported on his dealer reports that he acquired 282,548 pounds of haddock. In reality he acquired only about 119,735 pounds, meaning that RAFAEL over-reported about 162,813 pounds of haddock. Overall, in 2014, RAFAEL acquired and sold approximately 215,007 pounds of fish that was falsely reported to NOAA as another kind of fish.

16. During the period of the conspiracy, RAFAEL falsely reported to NOAA the species of approximately 815,812 pounds of fish.

General Allegations Concerning the Offenses Charged in Counts 27-28

17. During the conspiracy charged in Count One, Person C paid RAFAEL lump sums of cash in exchange for misreported fish and other fish Person C received from RAFAEL.
18. RAFAEL disposed of that cash at least in part by smuggling it through Logan Airport, in Boston, Massachusetts, or having others do so on his behalf, onto flights to Portugal, where he deposited the cash, or caused it to be deposited, into bank accounts he maintained in that country.
19. FREITAS is a Sheriff's Deputy employed by the Bristol County Sheriff's Office, which is based in Dartmouth, Massachusetts. At times relevant to this Indictment, FREITAS was also a Task Force Officer assigned to the U.S. Department of Homeland Security, where he assisted with federal criminal investigations undertaken by that agency. In that capacity, FREITAS was given badge access to restricted areas of Logan Airport, and so could move freely through the airport without having to go through airport security.
20. FREITAS assisted RAFAEL with smuggling cash through the airport.

21. For example, on February 5, 2016, FREITAS was scheduled to fly from Boston, Massachusetts, to Portugal with Person D, his fiancé. Earlier that week, FREITAS received \$17,500 in U.S. currency from RAFAEL.
22. Before going to the airport on February 5, FREITAS divided the \$17,500 between himself and Person D, so each of them was carrying under \$10,000. At Logan Airport, FREITAS and Person D, carrying the \$17,500 between them, proceeded through security without incident and without declaring the currency. Once in Portugal, FREITAS deposited the funds into a Portuguese account owned by RAFAEL.

COUNT ONE
(Conspiracy to Commit Offenses Against the United States)

23. The Grand Jury realleges and incorporates by reference paragraphs 1-22 of this Indictment, and further charges that:
24. Beginning in or about 2012 through January 2016, in the District of Massachusetts and elsewhere,

CARLOS A. RAFAEL,

defendant herein, together with others known and unknown to the Grand Jury, conspired to commit offenses against the United States, to wit, knowingly making and submitting a materially false record and materially false identification of fish with a market value of greater than \$350, which was sold, offered for sale, and with respect to which acts were committed with the intent to sell, and which was, and was intended to be, transported in interstate commerce, in violation of 16 U.S.C. §§ 3372(d) & 3373(d), all in violation of 18 U.S.C. § 371.

COUNTS TWO – TWENTY-FOUR
(False Labeling and Fish Identification)

25. The Grand Jury realleges and incorporates by reference paragraphs 1-22 of this Indictment, and further charges that:
26. On or about the dates specified below, in the District of Massachusetts and elsewhere,

CARLOS A. RAFAEL,

defendant herein, knowingly made and submitted materially false records and materially false identifications of fish, specifically, data identifying fish species in dealer reports electronically submitted to the National Oceanic and Atmospheric Administration within the U.S. Department of Commerce, such fish having a market value of greater than \$350 and which was sold, offered for sale, and with respect to which acts were committed with the intent to sell, and which was, and was intended to be, transported in interstate commerce, as follows:

Count	Dealer Report Number	Date Dealer Report Submitted (on or about)	Vessel Landing Catch	Species Falsely Entered in Dealer Report
2	12224596	January 29, 2016	FV Hera II	Haddock
3	12216025	January 26, 2016	FV Hera II	Haddock
4	12216020	January 26, 2016	FV Hercules	Haddock
5	11867232	October 10, 2015	FV Athena	Haddock
6	11511424	July 12, 2015	FV Poseidon	Pollock
7	10987436	January 10, 2015	FV Athena	Haddock
8	10987438	January 10, 2015	FV Bulldog	Haddock
9	10961264	January 3, 2015	FV Patricia	Pollock
10	10961267	January 3, 2015	FV Bulldog	Pollock
11	10521083	August 29, 2014	FV Olivia & Rafaela	Haddock
12	10521077	August 29, 2014	FV Destiny	Haddock
13	10420763	August 8, 2014	FV Southern Crusader II	Haddock
14	10353459	July 25, 2014	FV Southern Crusader II	Haddock

15	9525104	October 5, 2013	FV Bulldog	Haddock Dabs
16	9495291	September 28, 2013	FV Olivia & Rafaela	Haddock
17	9495292	September 28, 2013	FV Sasha Lee	Haddock
18	9345518	August 22, 2013	FV Drake	Haddock
19	9260800	August 3, 2013	FV Southern Crusader II	Haddock
20	8686213	January 19, 2013	FV Southern Crusader II	Haddock
21	7348974	July 26, 2012	FV Sasha Lee	Haddock
22	7348977	July 26, 2012	FV Lady Patricia	Haddock
23	7348980	July 26, 2012	FV My Way	Haddock
24	7201510	June 14, 2012	FV Bulldog	Haddock

All in violation of 16 U.S.C. §§ 3372(d) & 3373(d).

COUNTS TWENTY-FIVE – TWENTY-SIX
(Falsifying Federal Records)

27. The Grand Jury realleges and incorporates by reference paragraphs 1-22 of this Indictment, and further charges that:

28. On or about the dates specified below, in the District of Massachusetts and elsewhere,

CARLOS A. RAFAEL,

defendant herein, knowingly falsified and made false entries in records and documents, specifically dealer reports, with the intent to impede, obstruct and influence the investigation and proper administration of matters within the jurisdiction of an agency of the United States, specifically the National Oceanic and Atmospheric Administration within the U.S. Department of Commerce, and in relation to and in contemplation of such matters, in that he misrepresented in dealer reports the species of certain fish, as follows:

Count	Dealer Report Number	Date Dealer Report Submitted (on or about)	Vessel Landing Catch	Species Falsely Entered in Dealer Report
25	11203148	April 4, 2015	FV Lady Patricia	Pollock
26	7244695	June 28, 2012	FV Sasha Lee	Haddock

All in violation of 18 U.S.C. § 1519.

COUNT TWENTY-SEVEN
(Bulk Cash Smuggling; Aiding and Abetting)

29. The Grand Jury realleges and incorporates by reference paragraphs 1-22 of this Indictment, and further charges that:

30. On or about February 5, 2016, in the District of Massachusetts,

CARLOS A. RAFAEL and
ANTONIO M. FREITAS,

defendants herein, with the intent to evade a currency reporting requirement under 31 U.S.C. § 5316, knowingly concealed more than \$10,000 in currency on their persons and in a conveyance, article of luggage, merchandise, and other container, specifically, concealed such currency on the person of ANTONIO M. FREITAS and on the person of Person D, and transported and attempted to transport such currency from a place within the United States to a place outside of the United States, specifically Portugal, all in violation of 31 U.S.C. § 5332(a) and 18 U.S.C. § 2.

COUNT TWENTY-EIGHT
(Structuring the Export of Monetary Instruments)

31. The Grand Jury realleges and incorporates by reference paragraphs 1-22 of this Indictment, and further charges that:
32. On or about February 5, 2016, in the District of Massachusetts,

ANTONIO M. FREITAS,

defendant herein, knowingly structured and assisted structuring the exportation of monetary instruments, specifically, U.S. currency carried on his person and on that of Person D, from the United States to Portugal, while aware of, and for the purpose of evading, a currency reporting requirement under 31 U.S.C. § 5316, all in violation of 31 U.S.C. § 5324(c)(3).

FALSE LABELING AND FISH IDENTIFICATION FORFEITURE ALLEGATION
(16 U.S.C. § 3374(a), 28 U.S.C. § 2461(c))

THE GRAND JURY FURTHER CHARGES THAT:

33. Upon conviction of one or more of the offenses in Counts 2 through 26 of this Indictment, the defendant herein,

CARLOS A. RAFAEL,

- shall forfeit to the United States of America, pursuant to Title 16, United States Code, Section 3374(a)(2), (1) all fish or wildlife or plants imported, exported, transported, sold, received, acquired, or purchased in violation of Title 16, United States Code, Section 3372(d), or any regulation issued pursuant thereto; and (2) all vessels, vehicles, aircraft, and other equipment used to aid in the importing, exporting, transporting, selling, receiving, acquiring, or purchasing of fish or wildlife or plants involved in such offenses if (A) the owner of such vessel, vehicle, aircraft or equipment was at the time of the alleged illegal act a consenting party or privy thereto or in the exercise of due care should have known that such vessel, vehicle, aircraft, or equipment would be used in a criminal violation of the Lacey Act, and (B) the violation involved the sale or purchase of, the offer of sale or purchase of, or the intent to sell or purchase, fish or wildlife or plants.
34. The property to be forfeited by the defendant includes, but is not limited to, the following fish vessels and accompanying permits:
- a. one fishing vessel named Athena, bearing vessel identification number 1122803 and permit number 410604;
 - b. one fishing vessel named My Way, bearing vessel identification number 603431 and permit number 330309;
 - c. one fishing vessel named Hera, bearing vessel identification number 945600 and permit number 410501;

- d. one fishing vessel named Hera II, bearing vessel identification number 1113613 and permit number 410612;
- e. one fishing vessel named Poseidon, bearing vessel identification number 613018 and permit number 330379;
- f. one fishing vessel named Lady Patricia, bearing vessel identification number 581831 and permit number 330200;
- g. one fishing vessel named Destiny, bearing vessel identification number 1031278 and permit number 330764;
- h. one fishing vessel named Olivia & Rafaela, bearing vessel identification number 553777 and permit number 330236;
- i. one fishing vessel named Hercules, bearing vessel identification number 669933 and permit number 330552;
- j. one fishing vessel named Sasha Lee, bearing vessel identification number 909149 and permit number 330795;
- k. one fishing vessel named Drake, bearing vessel identification number 618310 and permit number 410246; and
- l. one fishing vessel named Bulldog, bearing vessel identification number 937040 and permit number 410471.
- m. One fishing vessel named Southern Crusader II, bearing vessel identification number 1038917 and permit number 330904.

35. If any of the property described in the above two paragraphs, as a result of any act or omission of the defendant,

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the property described in paragraph 33.

All pursuant to Title 16, United States Code, Section 3374(a), and Title 28, United States Code, Section 2461(c).

BULK CASH AND STRUCTURING FORFEITURE ALLEGATION
(31 U.S.C. §§ 5332(b)(2), 5317(c)(1))

THE GRAND JURY FURTHER CHARGES THAT:

36. Upon conviction of one or more of the offenses in Counts 27 and 28 of this Indictment, the defendants herein,

CARLOS A. RAFAEL and
ANTONIO M. FREITAS,

MRF, 5/14/16

jointly and severally as to Count 27 only, shall forfeit to the United States of America, pursuant to Title 31, United States Code, Sections 5332(b) and 5317(c), all property, real or personal, involved in the offenses and any property traceable thereto.


37. If any of the property described in the above two paragraphs, as a result of any act or omission 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 this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;


it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 31, United States Code, Sections 5317(c)(1)(B) and 5332(b)(3), to seek forfeiture of any other property of the defendants up to the value of the property described in paragraph 36.

All pursuant to Title 31, United States Code, Sections 5332(b) and 5317(c).

A TRUE BILL,




FOREPERSON OF THE GRAND JURY



ANDREW E. LELLING
Assistant U.S. Attorney

DISTRICT OF MASSACHUSETTS, May 4, 2016
Returned into the District Court by the Grand Jury Foreperson and filed.



Deputy Clerk

S-4-16

2:33

SEALED

Criminal Case Cover Sheet

U.S. District Court - District of Massachusetts

Place of Offense: _____ Category No. II Investigating Agency IRS
City New Bedford Related Case Information: 16CR10124
County Bristol Superseding Ind./ Inf. _____ Case No. _____
Same Defendant _____ New Defendant _____
Magistrate Judge Case Number 16-MJ-4138-DHH
Search Warrant Case Number 16-MJ-4137-DHH
R 20/R 40 from District of _____

Defendant Information:

Defendant Name CARLOS A. RAFAEL Juvenile: Yes No
Is this person an attorney and/or a member of any state/federal bar: Yes No

Alias Name _____

Address (City & State) Dartmouth, Massachusetts

Birth date (Yr only): 1952 SSN (last4#): 2017 Sex M Race: W Nationality: Portuguese

Defense Counsel if known: William Kettlewell, Esq. Address Collora LLP

Bar Number _____ 100 High Street, Boston, MA

U.S. Attorney Information:

AUSA ANDREW LELLING Bar Number if applicable 631859

Interpreter: Yes No List language and/or dialect: _____

Victims: Yes No If yes, are there multiple crime victims under 18 USC§3771(d)(2) Yes No

Matter to be SEALED: Yes No

Warrant Requested Regular Process In Custody

Location Status:

Arrest Date 02/26/2016

Already in Federal Custody as of _____ in _____

Already in State Custody at _____ Serving Sentence Awaiting Trial

On Pretrial Release: Ordered by: Hennessy, J. on 3/2/2016

Charging Document: Complaint Information Indictment

Total # of Counts: Petty _____ Misdemeanor _____ Felony 27

Continue on Page 2 for Entry of U.S.C. Citations

I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.

Date: 5/4/2016 Signature of AUSA: [Signature]

District Court Case Number (To be filled in by deputy clerk): _____

Name of Defendant CARLOS RAFAEL

U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 U.S.C. § 371</u>	<u>Conspiracy</u>	<u>1</u>
Set 2	<u>16 U.S.C. § 3372(d)</u>	<u>False entries and false labeling</u>	<u>2-24</u>
Set 3	<u>18 U.S.C. § 1519</u>	<u>False entries intended to impede and influence matters within federal jurisdiction</u>	<u>25-26</u>
Set 4	<u>31 U.S.C. § 5332(a)</u>	<u>Bulk cash smuggling</u>	<u>27</u>
Set 5	<u>16 U.S.C. § 3374(a)</u>	<u>First Forfeiture Allegation</u>	
Set 6	<u>31 U.S.C. §§ 5332, 5317</u>	<u>Second Forfeiture Allegation</u>	
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION: _____

Criminal Case Cover Sheet

U.S. District Court - District of Massachusetts

Place of Offense: _____ Category No. II Investigating Agency FBI

City New Bedford

Related Case Information:

16cr10124

County Bristol

Superseding Ind./ Inf. _____ Case No. _____
Same Defendant _____ New Defendant _____
Magistrate Judge Case Number _____
Search Warrant Case Number 16-MJ-4137-DHH
R 20/R 40 from District of _____

SEALED

Defendant Information:

Defendant Name ANTONIO M. FREITAS Juvenile: Yes No

Is this person an attorney and/or a member of any state/federal bar: Yes No

Alias Name _____

Address (City & State) Taunton, Massachusetts

Birth date (Yr only): 1970 SSN (last4#): 8496 Sex M Race: W Nationality: United States

Defense Counsel if known: _____ Address _____

Bar Number _____

U.S. Attorney Information:

AUSA ANDREW LELLING Bar Number if applicable 631859

Interpreter: Yes No List language and/or dialect: _____

Victims: Yes No If yes, are there multiple crime victims under 18 USC§3771(d)(2) Yes No

Matter to be SEALED: Yes No

Warrant Requested Regular Process In Custody

Location Status:

Arrest Date _____

Already in Federal Custody as of _____ in _____

Already in State Custody at _____ Serving Sentence Awaiting Trial

On Pretrial Release: Ordered by: _____ on _____

Charging Document: Complaint Information Indictment

Total # of Counts: Petty _____ Misdemeanor _____ Felony 2

Continue on Page 2 for Entry of U.S.C. Citations

I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.

Date: 5/4/2016

Signature of AUSA: [Signature]

District Court Case Number (To be filled in by deputy clerk): _____

Name of Defendant ANTONIO FREITAS

U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>31 U.S.C. § 5332(a)</u>	<u>Bulk cash smuggling</u>	<u>27</u>
Set 2	<u>31 U.S.C. § 5324(c)</u>	<u>International structuring</u>	<u>28</u>
Set 3	<u>31 U.S.C. §§ 5332, 5317</u>	<u>Second Forfeiture Allegation</u>	
Set 4	_____	_____	_____
Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION: _____