

**Aug 13, 2021**

ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S.D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
**21-20431-CR-COOKE/O'SULLIVAN**

Case No. \_\_\_\_\_

18 U.S.C. § 1956(h)

18 U.S.C. § 982(a)(1)

**UNITED STATES OF AMERICA**

**vs.**

**RICARDO SERRET and  
BEATRIZ MIERES,**

**Defendants.**

**INFORMATION**

The Acting United States Attorney charges that:

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

From in or around March 2016, and continuing through in or around March 2019, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**RICARDO SERRET and  
BEATRIZ MIERES,**

did knowingly and voluntarily combine, conspire, confederate, and agree with each other and others, known and unknown to the Acting United States Attorney, to conduct a financial transaction affecting interstate and foreign commerce, which financial 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, 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).

It is further alleged that the specified unlawful activity is health care fraud, in violation of Title 18, United States Code, Section 1347; wire fraud, in violation of Title 18, United States Code, Section 1343; and conspiracy to commit health care fraud, in violation of Title 18, United States Code, Section 1349.

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

**FORFEITURE**  
**(18 U.S.C. § 982(a)(1))**

1. The allegations in this Information 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 the defendants have an interest.

2. Upon conviction of the violation of Title 18, United States Code, Section 1956, as alleged in this Information, the defendant so convicted shall forfeit to the United States any property, real or personal, involved in such offense, and any property traceable to such property, pursuant to Title 18, United States Code, Section 982(a)(1).

3. The property subject to forfeiture includes, but is not limited to, a sum of approximately \$384,351 in United States currency, which represents the total amount of funds involved in the violation of Title 18, United States Code, Section 1956, alleged in this Information and which may be sought as a forfeiture money judgment.


4. If any of the property subject to forfeiture, as a result of any act or omission of any 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 the court;

- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

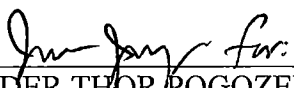
the United States shall be entitled to the forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p).

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).

  
\_\_\_\_\_  
JUAN ANTONIO GONZALEZ  
ACTING UNITED STATES ATTORNEY  
SOUTHERN DISTRICT OF FLORIDA

DANIEL KAHN, ACTING CHIEF  
CRIMINAL DIVISION, FRAUD SECTION  
U.S. DEPARTMENT OF JUSTICE

ALLAN MEDINA, DEPUTY CHIEF  
CRIMINAL DIVISION, FRAUD SECTION  
U.S. DEPARTMENT OF JUSTICE

  
\_\_\_\_\_  
ALEXANDER THOR POGOZELESKI  
TRIAL ATTORNEY  
CRIMINAL DIVISION, FRAUD SECTION  
U.S. DEPARTMENT OF JUSTICE

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

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

v.

RICARDO SERRET and  
BEATRIZ MIERES,**CERTIFICATE OF TRIAL ATTORNEY\*****Superseding Case Information:**

Defendants/

Court Division: (Select One)

☒ Miami ☐ Key West ☐ FTL  
☐ WPB ☐ FTPNew 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 0 days for the parties to try.

- Please check appropriate category and type of offense listed below:

(Check only one)

- |     |                  |                                     |
|-----|------------------|-------------------------------------|
| I   | 0 to 5 days      | <input checked="" type="checkbox"/> |
| II  | 6 to 10 days     | <input type="checkbox"/>            |
| III | 11 to 20 days    | <input type="checkbox"/>            |
| IV  | 21 to 60 days    | <input type="checkbox"/>            |
| V   | 61 days and over | <input type="checkbox"/>            |

(Check only one)

- |             |                                     |
|-------------|-------------------------------------|
| Petty       | <input type="checkbox"/>            |
| Minor       | <input type="checkbox"/>            |
| Misdemeanor | <input type="checkbox"/>            |
| Felony      | <input checked="" type="checkbox"/> |

- 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 or No) **No**
- Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)? (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 October 3, 2019 (Mag. Judge Jared Strauss)? (Yes or No) **No**

  
ALEXANDER THOR POGOZELESKI

DOJ Trial Attorney

Court ID No. A5502549

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: RICARDO SERRET

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

Count #: 1

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

Conspiracy to Commit Money Laundering

\*Max Penalty: Twenty (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: BEATRIZ MIERES

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

Count #: 1

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

Conspiracy to Commit Money Laundering

\*Max Penalty: Twenty (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.**

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

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UNITED STATES DISTRICT COURT

for the  
Southern District of Florida

United States of America

v.

Ricardo Serret,

*Defendant*

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Case No. 21-20431-CR-COOKE/  
O'SULLIVAN

**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*

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

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UNITED STATES DISTRICT COURT

for the  
Southern District of Florida

United States of America  
v.

Beatriz Mieres,  
*Defendant*

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Case No. 21-20431-CR-COOKE/  
O'SULLIVAN

**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*