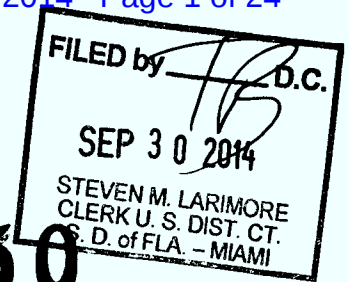


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

14 - 20750



CASE NO. _____

18 U.S.C. § 371
18 U.S.C. § 641
18 U.S.C. § 981(a)(1)(C)

CR - LENARD

/GOODMAN

UNITED STATES OF AMERICA

vs.

ALEJANDRO AMOR,
JOSE W. GONZALEZ,
MICHAEL GRUBBS, and
ANTHONY MINCEY,

Defendants.

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At various times relevant to this Indictment:

Fast Train

1. Fast Train II, Corporation ("Fast Train") was a Florida corporation doing business as "Fast Train College," with its principle place of business located at 10100 S.W. 107th Avenue, Miami, Florida. Fast Train was a for-profit proprietary college that awarded career diplomas and industry certifications in medical assisting, medical coding, patient care, computer technology, and information technology, among others.

2. Fast Train operated seven campuses across the state of Florida, which included two in Miami-Dade County, two in Broward County, one in Hillsborough County, one in Pinellas County, and one in Duval County.

3. In Miami-Dade County, the two Fast Train campuses were located at 10100 S.W. 107th Avenue, Miami, Florida (“the Kendall Campus”) and 5555 West Flagler Street, Miami, Florida (“the Flagler campus”).

4. In Broward County, the two Fast Train campuses were located at 51 North State Road 7, Plantation, Florida (“the Fort Lauderdale campus”) and 15800 Pines Boulevard, Suite 301, Pembroke Pines, Florida (“the Pembroke Pines campus”).

5. In Hillsborough County, the Fast Train campus was located at 2156 University Square Mall, Tampa, Florida (“the Tampa campus”).

6. In Pinellas County, the Fast Train campus was located at 2414 Enterprise Road, Clearwater, Florida (“the Clearwater campus”).

7. In Duval County, the Fast Train campus was located at 10752 Deerwood Park Boulevard South, Suite 201, Jacksonville, Florida (“the Jacksonville campus”).

8. Defendant **ALEJANDRO AMOR**, a resident of Miami-Dade County, was president and chief operating officer of Fast Train.

9. Defendant **JOSE W. GONZALEZ**, a resident of Broward and Volusia Counties, was employed by Fast Train as an admissions representative at the Fort Lauderdale campus, the Jacksonville campus, the Tampa campus, and the Clearwater campus.

10. Defendant **MICHAEL GRUBBS**, a resident of Duval County, was employed by Fast Train as the director of admissions at the Jacksonville campus.

11. Defendant **ANTHONY MINCEY**, a resident of Duval County, was employed by Fast Train as the assistant director of admissions at the Jacksonville campus.

12. Luis Arroyo, a resident of Broward County, was employed by Fast Train as the director of admissions at the Kendall campus, the Flagler campus, and the Fort Lauderdale campus.

13. Juan Arreola, a resident of Broward County, was employed by Fast Train as the corporate director of admissions.

14. Juan Peña, a resident of Miami-Dade County, was employed by Fast Train as an admissions representative at the Flagler campus and then the director of admissions at the Fort Lauderdale campus.

Federal Student Aid Programs and Procedures

15. The Office of Federal Student Aid, a part of the United States Department of Education (“Department of Education”), was the largest provider of student financial aid in the nation. The Office of Federal Student Aid provided more than \$150 billion in federal grants, loans, and work-study funds each year to more than 15 million students paying for college or career school. Student financial aid was authorized by Title IV of the Higher Education Act of 1965 (“Title IV”).

16. The Federal Pell Grant Program (“the Pell Grant Program”), administered and funded by the United States Department of Education provided financial aid to eligible post-secondary students to assist them in meeting the costs of a post-secondary education. Student recipients were not required to repay Pell Grants, which were paid to the school where the student was enrolled to cover tuition and related costs.

17. The Federal Direct Loan Program (“the Direct Loan Program”), also administered and funded by the Department of Education, provided loans directly from the Federal government to vocational, undergraduate, and graduate postsecondary school students and their parents. Federal Direct Loans (“Direct Loans”) were paid to the school in which the student was enrolled to cover tuition and other costs. Direct Loans had to be repaid by the student beginning six months after the student ceased to carry at least one-half the normal full-time academic workload.

18. In order to qualify for the Pell Grant or Direct Loan Programs, schools were required to be accredited or approved by an appropriate agency and offer a program of study leading to an academic or professional degree, vocational certificate or other recognized educational credential. Participation in the Pell Grant or Direct Loan Program was conditioned upon compliance with all applicable federal laws and regulations.

19. Once the amount of a student's Pell Grant or Direct Loan was determined, the school then applied for the disbursement of funds electronically. The school was entitled to draw down the funds in two stages within an academic year. For certain schools, the award of Pell Grants or the disbursement of Direct Loans was based on the number of hours to be completed by a student, who must have been enrolled in and attending an eligible program. This information was electronically submitted to the Department of Education.

20. Schools participating in the Pell Grant or Direct Loan Program had to document student attendance and ensure that the student met all student eligibility requirements contained in the “Program Participation Agreement” entered into by all participating schools. In particular, students were required to possess a high school diploma, a General Equivalency Diploma

("GED"), or other credential approved by the Department of Education, in order to receive Pell Grant or Direct Loan funds. In addition, participating schools had to calculate refunds for students who dropped out or withdrew from school and refund the amount to the Department of Education.

21. Fast Train was approved by the Department of Education to receive both Pell Grants and Direct Loans. **ALEJANDRO AMOR** signed a "Program Participation Agreement," in which he agreed to comply with all applicable federal statutes and regulations relating to the Pell Grant and Direct Loan Programs, including, among other things, the requirement that Fast Train enroll only students with a high school diploma, GED, or other credential approved by the Secretary of Education.

22. Students applying for federal student aid, including Pell Grants and Direct Loans, used the Free Application for Federal Student Aid ("FAFSA"). FAFSAs were submitted electronically to the Department of Education's Central Processing System ("CPS"), located at the Virtual Data Center in Plano, Texas. Once CPS determined the student's eligibility for Pell Grants and Direct Loans, participating schools could draw down the funds into the school bank account via direct deposit, using G5, the Department of Education payment system.

23. **ALEJANDRO AMOR** and his wife, D.A., opened Regions Bank business account number XXXXX-8134 in the name Fast Train of Miami, for the purpose of receiving Direct Loans. **AMOR** and D.A. were the sole signatories on this account.

24. **ALEJANDRO AMOR** and his wife, D.A., opened Regions Bank business account number XXXXXX-8371 in the name Fast Train of Miami, for the purpose of receiving Pell Grants. **ALEJANDRO AMOR** and D.A. were the sole signatories on this account.

25. **ALEJANDRO AMOR** and his wife, D.A., opened Regions Bank business account number XXXXXX-8767 in the name Fast Train of Fort Lauderdale, for the purpose of receiving Direct Loans. **AMOR** and his D.A. were the sole signatories on this account.

26. **ALEJANDRO AMOR** and his wife, D.A., opened Regions Bank business account number XXXXXX-8759 in the name Fast Train of Fort Lauderdale, for the purpose of receiving Pell Grants. **AMOR** and D.A. were the sole signatories on this account.

28. **ALEJANDRO AMOR** and his wife, D.A., opened Regions Bank business account number XXXXXX-8740 in the name Fast Train of Tampa, for the purpose of receiving Direct Loans. **AMOR** and D.A. were the sole signatories on this account.

28. **ALEJANDRO AMOR** and his wife, D.A., opened Regions Bank business account number XXXXXX-8724 in the name Fast Train of Tampa, for the purpose of receiving Pell Grants. **AMOR** and D.A. were the sole signatories on this account.

29. **ALEJANDRO AMOR** and his wife, D.A., opened Regions Bank business account number XXXXXX-8142 in the name Fast Train of Jacksonville, for the purpose of receiving Direct Loans. **AMOR** and D.A. were the sole signatories on this account.

30. **ALEJANDRO AMOR** and his wife, D.A., opened Regions Bank business account number XXXXXX-8150 in the name Fast Train of Jacksonville, for the purpose of receiving Pell Grants. **AMOR** and D.A. were the sole signatories on this account

COUNT 1
Conspiracy to Commit an Offense Against the United States
(18 U.S.C. § 371)

1. Paragraphs 1 through 30 of the General Allegations section of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

2. From in or around August 2008, through in or around May 2012, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**ALEJANDRO AMOR,
JOSE W. GONZALEZ,
MICHAEL GRUBBS,
and
ANTHONY MINCEY,**

did willfully, that is, with the intent to further the object of the conspiracy, and knowingly, combine, conspire, confederate, and agree with each other, Luis Arroyo, Juan Arreola, Juan Peña, and other persons known and unknown to the Grand Jury, to commit an offense against the United States, that is, to knowingly embezzle, steal, purloin, and convert to their own use and the use of another, money and things of value of the United States and of a department and agency thereof, the aggregate amount of which exceeded \$1,000.00, that is, United States Department of Education Pell Grant and Direct Loan funds, in violation of Title 18, United States Code, Section 641.

PURPOSE OF THE CONSPIRACY

3. It was the purpose of the conspiracy for the defendants and their co-conspirators to unlawfully enrich themselves by obtaining and misappropriating Pell Grant and Direct Loan funds from the United States Department of Education by making materially false and fraudulent representations, and by the concealment of material facts, concerning, among other things, the eligibility of students to receive Pell Grant and Direct Loan funds and the students' status as a high school graduate.

MANNER AND MEANS OF 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, among other things, the following:

4. Beginning in or around August 2008, **ALEJANDRO AMOR** directed **JOSE W. GONZALEZ, ANTHONY MINCEY, MICHAEL GRUBBS**, Luis Arroyo, Juan Arreola, and Juan Peña, and others, to enroll students without high school diplomas or GEDs in Fast Train. **AMOR** further directed **GONZALEZ, MINCEY, GRUBBS**, Arroyo, Arreola, and Peña, and others, to coach those students to lie to Fast Train financial aid representatives assisting students with their FAFSAs, in order to falsely and fraudulently obtain Pell Grant and Direct Loan funds for the students.

5. **JOSE W. GONZALEZ, ANTHONY MINCEY, MICHAEL GRUBBS**, Luis Arroyo, Juan Arreola, and Juan Peña, and others, acting at the direction of **ALEJANDRO AMOR**, recruited students without high school diplomas to enroll in Fast Train by, among other things, falsely and fraudulently advising the students that they could obtain a high school diploma for a fee and should falsely and fraudulently respond yes when asked by Fast Train financial aid representatives whether they had a high school diploma or GED.

6. **ALEJANDRO AMOR, JOSE W. GONZALEZ, ANTHONY MINCEY, MICHAEL GRUBBS**, Luis Arroyo, Juan Arreola, and Juan Peña, and others, caused approximately one thousand, three hundred (1,300) Fast Train students to submit FAFSAs to the United States Department of Education falsely and fraudulently indicating that the student had graduated from high school.

7. As a result of these false and fraudulent FAFSAs, **ALEJANDRO AMOR** received approximately \$6,560,000 in Pell Grants and Direct Loans from the United States Department of Education.

8. **ALEJANDRO AMOR** used the proceeds from the false and fraudulent FAFSAs for his own benefit and the benefit of others, and to further the fraud.

OVERT ACTS

In furtherance of the conspiracy and to achieve the object and purpose thereof, at least one of the co-conspirators committed and caused to be committed in the Southern District of Florida, and elsewhere, at least one of the following overt acts, among others:

1. In or around July 2010, Juan Arreola recruited R.S. to enroll at the Fast Train Pembroke Pines campus, even though R.S. told Arreola she did not have a high school diploma.
2. In or around July 2010, Arreola falsely and fraudulently told R.S. that she could earn her diploma while attending Fast Train and asked her the last high school she had attended.
3. In or around July 2010, Juan Arreola directed R.S. to falsely and fraudulently tell a Fast Train financial aid representative that she had graduated from high school.
4. On or about July 31, 2010, Juan Arreola caused R.S. to submit a FAFSA, with the help of a Fast Train financial aid representative, falsely and fraudulently indicating that R.S. had graduated from high school.
5. On or about October 12, 2010, **ALEJANDRO AMOR** caused Fast Train to draw down approximately \$1,567 in Pell Grant funds granted to R.S.
6. On or about October 20, 2010, **ALEJANDRO AMOR** caused Fast Train to draw down approximately \$1,834 in Direct Loan funds provided to R.S.

7. In or around September 2010, **ALEJANDRO AMOR, JOSE W. GONZALEZ** and Juan Arreola traveled from Miami, Florida to Tampa, Florida and met with new admissions representative D.G. at the Tampa campus.

8. In or around September 2010, **ALEJANDRO AMOR, JOSE W. GONZALEZ**, and Juan Arreola drove D.G. around Tampa to train him regarding Fast Train recruitment techniques.

9. During D.G.'s recruitment training, **ALEJANDRO AMOR, JOSE W. GONZALEZ**, and Juan Arreola recruited students without high school diplomas, in order to show him how to do so.

10. In or around December 2010, **JOSE W. GONZALEZ** recruited M.P. to enroll as a student at the Fast Train Fort Lauderdale campus, even though M.P. told **GONZALEZ** she did not have a high school diploma.

11. In or around December 2010, **JOSE W. GONZALEZ** falsely and fraudulently told M.P. she could pay \$400 to take a test in order to earn her high school diploma from American Worldwide Academy.

12. In or around December 2010, **JOSE W. GONZALEZ** directed M.P. to falsely and fraudulently tell a Fast Train financial aid representative that she had graduated from high school.

13. On or about December 21, 2010, **JOSE W. GONZALEZ** caused M.P. to submit a FAFSA, with the help of a Fast Train financial aid representative, falsely and fraudulently indicating that M.P. had graduated from high school.

14. On or about March 30, 2011, **ALEJANDRO AMOR** caused Fast Train to draw

down approximately \$3,700 in Pell Grant funds granted to M.P.

15. On or about April 1, 2011, **ALEJANDRO AMOR** caused Fast Train to draw down approximately \$6,334 in Direct Loan funds provided to M.P.

16. In or around January 2011, Juan Peña recruited G.V. to enroll as a student at the Fast Train Flagler campus, even though G.V. told Peña he did not have a high school diploma.

17. In or around January 2011, Juan Peña falsely and fraudulently told G.V. he could earn his high school diploma from American Worldwide Academy for \$250.

18. In or around January 2011, Juan Peña caused G.V. to falsely and fraudulently tell a Fast Train financial aid representative that he had graduated from high school.

19. On or about January 7, 2011, Juan Peña caused G.V. to submit a FAFSA, with the help of Fast Train financial aid representative, falsely and fraudulently indicating that G.V. had graduated from high school.

20. On or about April 18, 2011, **ALEJANDRO AMOR** caused Fast Train to draw down approximately \$1,850 in Pell Grant funds granted to G.V.

21. On or about April 20, 2011, **ALEJANDRO AMOR** caused Fast Train to draw down approximately \$3,167 in Direct Loan funds provided to G.V.

22. In or around May 2011, **ALEJANDRO AMOR** and his wife D.A. met with N.M., the mother of G.V., where N.M. told **AMOR** she was concerned that her son did not have a high school diploma but was still attending Fast Train.

23. During the meeting, **ALEJANDRO AMOR** told N.M. that he did not care that G.V. did not have a high school diploma.

24. In or around early February 2011, Juan Peña recruited M.L. to enroll as a student

at the Fast Train Flagler campus, even though M.L. told Peña she did not have a high school diploma.

25. In or around early February 2011, Juan Peña falsely and fraudulently told M.L. not to worry and that she could earn her diploma while at Fast Train.

26. In or around early February 2011, Juan Peña caused M.L. to falsely and fraudulently tell a Fast Train financial aid representative that she had graduated from high school.

27. On or about February 16, 2011, Juan Peña caused M.L. to submit a FAFSA, with the help of a Fast Train financial aid representative, falsely and fraudulently indicating that M.L. had graduated from high school.

28. On or about March 23, 2011, **ALEJANDRO AMOR** caused Fast Train to draw down approximately \$1,850 in Pell Grant funds granted to M.L.

29. On or about April 13, 2011, **ALEJANDRO AMOR** caused Fast Train to draw down a total of approximately \$3,167 in Direct Loan funds provided to M.L.

30. In or around mid-May 2011, **JOSE W. GONZALEZ** recruited C.D. to enroll as a student at the Fast Train Jacksonville campus, even though C.D. told **GONZALEZ** that he did not have a high school diploma.

31. In or around mid-May 2011, **JOSE W. GONZALEZ** falsely and fraudulently told C.D. that he could take a test and receive his diploma from American Worldwide Academy while at Fast Train.

32. In or around mid-May 2011, **MICHAEL GRUBBS** met with C.D. at the Fast Train Jacksonville campus, where **GRUBBS** falsely and fraudulently told C.D. that it did not

matter that C.D. did not have a high school diploma and that C.D. could earn his G.E.D. while enrolled at Fast Train.

33. In or around mid-May 2011, **ANTHONY MINCEY** met with C.D. at the Fast Train Jacksonville campus, where **MINCEY** falsely and fraudulently told C.D. not to worry that he did not have a high school diploma.

34. On or about May 18, 2011, **JOSE W. GONZALEZ**, **MICHAEL GRUBBS**, and **ANTHONY MINCEY** caused C.D. to submit a FAFSA, with the help of a Fast Train financial aid representative, falsely and fraudulently indicating that C.D. had graduated from high school.

35. On or about August 19, 2011, **ALEJANDRO AMOR** caused Fast Train to draw down approximately \$6,334 in Direct Loan funds provided to C.D.

36. On or about September 26, 2011, **ALEJANDRO AMOR** caused Fast Train to draw down approximately \$1,850 in Pell Grant funds granted to C.D.

37. In or around October 2011, an unidentified female co-conspirator enrolled S.D. and her friend at the Fast Train Fort Lauderdale campus, even though S.D. told the co-conspirator that she and her friend did not have high school diplomas.

38. In or around October 2011, the unidentified co-conspirator falsely and fraudulently told S.D. that she and her friend could earn their diplomas while attending Fast Train.

39. In or around October 2011, Luis Arroyo gave S.D. an exam with a test booklet and an answer sheet and falsely and fraudulently told her she could complete the test in order to earn her high school diploma.

40. In or around October 2011, Luis Arroyo gave S.D. a fictitious and fraudulent

diploma from Cornerstone Christian Academy, upon S.D.'s completion of the test.

41. On or about November 3, 2011, Luis Arroyo caused S.D. to submit a FAFSA, with the help of a Fast Train financial aid representative, falsely and fraudulently indicating that S.D. had graduated from high school.

42. On or about December 21, 2011, **ALEJANDRO AMOR** caused Fast Train to draw down approximately \$1,850 in Pell Grant funds granted to S.D.

43. On or about February 22, 2012, **ALEJANDRO AMOR** caused Fast Train to draw down approximately \$3,167 in Direct Loan funds provided to S.D.

44. In or around March 2012, **ANTHONY MINCEY** spoke to C.J. on the telephone about potential enrollment at the Fast Train Jacksonville campus, and, after C.J. told **MINCEY** she did not have a high school diploma, **MINCEY** falsely and fraudulently told C.J. she did not need one in order to attend Fast Train.

45. In or around March 2012, **ANTHONY MINCEY** helped C.J. fill out her Fast Train enrollment paperwork and instructed C.J. to list the last high school she attended and the year she would have graduated.

46. On or about April 20, 2012, **ANTHONY MINCEY** caused C.J. to submit a FAFSA, with the help of a Fast Train financial aid representative, falsely and fraudulently indicating that C.J. had graduated from William M. Raines Senior High School.

47. On or about May 14, 2012, **ALEJANDRO AMOR** caused Fast Train to draw down approximately \$1,850 in Pell Grant funds granted to C.J.

47. On or about May 16, 2012, **ALEJANDRO AMOR** caused Fast Train to draw down approximately \$3,167 in Direct Loan funds provided to C.J.

All in violation of Title 18, United States Code, Section 371.

COUNTS 2-15
Theft of Government Property
(18 U.S.C. § 641)

1. Paragraphs 1 through 30 of the General Allegations section of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

2. On or about the dates specified as to each count below, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants, as specified in each count below, did knowingly embezzle, steal, purloin, and convert to their own use and the use of another, money and things of value of the United States and of a department and agency thereof, the aggregate amount of which exceeded \$1,000.00, that is, United States Department of Education Pell Grant and Direct Loan funds, as specified in each count below:

Count	Defendant(s)	Approximate Date	Student	Approximate Amount of Pell Grant and Direct Loan Funds	Account Number
2	ALEJANDRO AMOR	10/12/2010	R.S.	\$1,567 (Pell Grant)	XXXXXXX-8759
3	ALEJANDRO AMOR	10/20/2010	R.S.	\$1,834 (Direct Loan)	XXXXXXX-8767
4	ALEJANDRO AMOR	3/23/2011	M.L.	\$1,850 (Pell Grant)	XXXXXXX-8371
5	ALEJANDRO AMOR and JOSE W. GONZALEZ	3/30/2011	M.P.	\$3,700 (Pell Grant)	XXXXXXX-8759
6	ALEJANDRO AMOR and JOSE W. GONZALEZ	4/1/2011	M.P.	\$6,334 (Direct Loan)	XXXXXXX-8767
7	ALEJANDRO AMOR	4/13/2011	M.L.	\$3,167 (Direct Loan)	XXXXXXX-8134

Count	Defendant(s)	Approximate Date	Student	Approximate Amount of Pell Grant and Direct Loan Funds	Account Number
8	ALEJANDRO AMOR	4/18/2011	G.V.	\$1,850 (Pell Grant)	XXXXXXX-8371
9	ALEJANDRO AMOR	4/20/2011	G.V.	\$3,167 (Direct Loan)	XXXXXXX-8134
10	ALEJANDRO AMOR, JOSE W. GONZALEZ, ANTHONY MINCEY, and MICHAEL GRUBBS	8/19/2011	C.D.	\$6,334 (Direct Loan)	XXXXXXX-8142
11	ALEJANDRO AMOR, JOSE W. GONZALEZ, ANTHONY MINCEY, and MICHAEL GRUBBS	9/26/2011	C.D.	\$1,850 (Pell Grant)	XXXXXXX-8150
12	ALEJANDRO AMOR	12/21/2011	S.D.	\$3,167 (Direct Loan)	XXXXXXX-8767
13	ALEJANDRO AMOR	2/22/2012	S.D.	\$1,850 (Pell Grant)	XXXXXXX-8759
14	ALEJANDRO AMOR and ANTHONY MINCEY	5/14/2012	C.J.	\$1,850 (Pell Grant)	XXXXXXX-8150
15	ALEJANDRO AMOR and ANTHONY MINCEY	5/16/2012	C.J.	\$3,167 (Direct Loan)	XXXXXXX-8142

In violation of Title 18, United States Code, Sections 641 and 2.

FORFEITURE ALLEGATIONS

1. The allegations in this Indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which each of the defendants, **ALEJANDRO AMOR, JOSE W. GONZALEZ, MICHAEL GRUBBS**, and **ANTHONY MINCEY**, has an interest.

2. Upon conviction of any violation of Title 18, United States Code, Section 641, or a conspiracy to commit such violation, as charged in this Indictment, each of the defendants shall forfeit any property, real or personal, which constitutes or is derived from proceeds traceable to the violation pursuant to Title 18, United States Code, Section 981(a)(1)(C).

3. The property subject to forfeiture includes, but is not limited to the sum of approximately \$6,500,000 in United States currency, which sum represents proceeds of the charged offenses.

4. If any of the property described above, as a result of any act or omission of any 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 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 of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), including the following property:

- 1) the real property located at 275 Veleros Ct., Coral Gables, Florida;

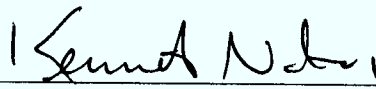
- 2) the real property located at 10703 SW 104th St., C-37, Miami, Florida;
- 3) the real property located at 10701 SW 104th St., C-38, Miami, Florida;
- 4) the real property located at 2735 NW 17th Terr., Miami, Florida;
- 5) one 2012 Jaguar XF Portfolio, VIN: SAJWA0HB8CLS22108;
- 6) one 2007 Mercedes Benz GL 450, VIN: 4JGBF71E67A180675;
- 7) one 2006 Chevrolet Corvette Z06, VIN: 1G1YY26E465120477;
- 8) one 2004 11'4" Boston Whaler, VIN: BWCE6734A404110TD, and trailer;
- 9) one 1997 53'7" Viking Yacht Co., BHN: VKY53168D797, and trailer;
- 10) one 1994 24' Boston Whaler, VIN: BWCD2130E494, and trailer;
- 11) one 1982 Mooney Aircraft M20K, S/N: 25-0654, TAIL: N1157L.
- 12) the contents, including interest, in South Florida Educational Federal Credit Union Account Number XXXXXX-8204 and XXXXXX-4761, in the name of Alejandro Amor; and
- 13) approximately \$201,409.50, including interest, in SunTrust Account Number XXXXXX-8439, in the name of D.A.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), as made applicable by Title 28, United States Code, Section 2461(c), and the procedures set forth in Title 21 United States Code, Section 853.

A TRUE BILL

~

FOREPERSON



WIFREDO A. FERRER
UNITED STATES ATTORNEY



AMANDA PERWIN
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES OF AMERICA

CASE NO. _____

vs.

ALEJANDRO AMOR,
JOSE W. GONZALEZ,
MICHAEL GRUBBS,
and ANTHONY MINCEY,

CERTIFICATE OF TRIAL ATTORNEY*

Defendants. _____ /

Superseding Case Information:

Court Division: (Select One)

 X Miami Key West
 FTL WPB
 FTP

New Defendant(s) _____
Number of New Defendants _____
Total number of counts _____

Yes No

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 11-20 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 _____
II 6 to 10 days _____
III 11 to 20 days X
IV 21 to 60 days _____
V 61 days and over _____

Petty _____
Minor _____
Misdem. _____
Felony X

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 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



AMANDA PERWIN
Assistant United States Attorney
Florida Bar No. 0046814

*Penalty Sheet(s) attached

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: ALEJANDRO AMOR

Case No: _____

Count: 1

Conspiracy to Commit an Offense Against the United States

Title 18, United States Code, Section 371

* Max. Penalty: Five (5) Years' Imprisonment

Counts: 2-15

Theft of Government Money

Title 18, United States Code, Section 641

* Max. Penalty: Ten (10) Years' Imprisonment as to each count

***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: JOSE W. GONZALEZ

Case No: _____

Count: 1

Conspiracy to Commit an Offense Against the United States

Title 18, United States Code, Section 371

* Max. Penalty: Five (5) Years' Imprisonment

Counts: 5, 6, 10, 11

Theft of Government Money

Title 18, United States Code, Section 641

* Max. Penalty: Ten (10) Years' Imprisonment as to each count

***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 GRUBBS

Case No: _____

Count: 1

Conspiracy to Commit an Offense Against the United States

Title 18, United States Code, Section 371

*** Max. Penalty:** Five (5) Years' Imprisonment

Counts: 10,11

Theft of Government Money

Title 18, United States Code, Section 641

*** Max. Penalty:** Ten (10) Years' Imprisonment as to each count

***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: ANTHONY MINCEY

Case No: _____

Count: 1

Conspiracy to Commit an Offense Against the United States

Title 18, United States Code, Section 371

* Max. Penalty: Five (5) Years' Imprisonment

Counts: 10, 11, 14, 15

Theft of Government Money

Title 18, United States Code, Section 641

* Max. Penalty: Ten (10) Years' Imprisonment as to each count

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