

FILED by **YH**
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ANGELA E. NOBLE
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S.D. OF FLA. - MIAMI

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. **19-20351-CR-ALTONAGA/GOODMAN**

18 U.S.C. § 371
18 U.S.C. § 981(a)(1)(C)
28 U.S.C. § 2461(e)

UNITED STATES OF AMERICA

vs.

**LUIS ALBERTO CHACIN HADDAD and
JESUS RAMON VEROES,**

Defendants.

_____ /

INFORMATION

The United States Attorney charges that:

GENERAL ALLEGATIONS

At all times relevant to this Information:

1. Defendant **LUIS ALBERTO CHACIN HADDAD** was a Venezuelan citizen residing in the Southern District of Florida. **CHACIN** became a legal permanent resident in the United States as of January 19, 2007. **CHACIN** was a “domestic concern” as that term is defined in the Foreign Corrupt Practices Act (“FCPA”), Title 15, United States Code, Section 78dd-2(h)(1)(A), and was an officer, employee, and agent of a “domestic concern” as that term is defined in the FCPA, Title 15 United States Code, Section 78dd-2(h)(1)(A).

2. Defendant **JESUS RAMON VEROES** was a citizen of Venezuela. **VEROES** was a “person” as that term is used in the FCPA, Title 15, United States Code, Section 78dd-3(f)(1).

3. Corporación Eléctrica Nacional SA (“Corpoelec”), was the state-owned and state-controlled electric company of Venezuela. Corpoelec performed a function that Venezuela treated as its own, and thus was an “instrumentality” of the Venezuelan government as that term is used in the FCPA, Title 15, United States Code, Sections 78dd-2(h)(2)(A), 78dd-3(f)(2)(A).

4. Foreign Official 1 was a high-level official in Venezuela’s Ministry of Electrical Energy and at Corpoelec from in and around 2015 through in and around the beginning of 2019. Foreign Official 2 was a high-level official at Corpoelec from in and around 2015 through in and around the beginning of 2019. The United States knows the identities of Foreign Official 1 and Foreign Official 2. Foreign Official 1 and Foreign Official 2 were “foreign officials” as that term is defined in the FCPA, Title 15, United States Code, Sections 78dd-2(h)(2)(A), 78dd-3(f)(2)(A).

CONSPIRACY TO COMMIT OFFENSE OR TO DEFRAUD THE UNITED STATES
(18 U.S.C. § 371)

Beginning in or around January 2016, through in or around at least December 2018, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

LUIS ALBERTO CHACIN HADDAD and
JESUS RAMON VEROES,

did knowingly and willfully, that is, with the intent to further the objects of the conspiracy, combine, conspire, confederate, and agree with each other and with others known and unknown to the United States to commit a certain offense against the United States, that is:

(a) being a domestic concern, to willfully make use of the mails and means and instrumentalities of interstate commerce corruptly in furtherance of an offer, payment, promise to pay, and authorization of the payment of any money, offer, gift, promise to give, and authorization of the giving of anything of value, to a foreign official or to a person, while knowing that all or part of such money or thing of value would be and had been offered, given, and promised to a

foreign official, for purposes of: (i) influencing any acts or decisions of such foreign official in his or her official capacity; (ii) inducing such foreign official to do and omit to do any acts in violation of the lawful duty of such official; (iii) securing any improper advantage; and (iv) inducing such foreign official to use his or her influence with a foreign government or agencies or instrumentalities thereof to affect or influence any acts or decisions of such government or agencies or instrumentalities, in order to assist **LUIS ALBERTO CHACIN HADDAD** and other domestic concerns in obtaining and retaining business for and with, and directing business to **LUIS ALBERTO CHACIN HADDAD** and other domestic concerns, in violation of Title 15, United States Code, Section 78dd-2(a);

(b) being a United States person, to willfully and corruptly do any act in furtherance of an offer, payment, promise to pay, and authorization of the payment of any money, offer, gift, promise to give, and authorization of the giving of anything of value, to a foreign official or to a person, while knowing that all or part of such money or thing of value would be and had been offered, given, and promised to a foreign official, for purposes of (i) influencing any acts or decisions of such foreign official in his or her official capacity; (ii) inducing such foreign official to do or omit to do any acts in violation of the lawful duty of such official; (iii) securing any improper advantage; and (iv) inducing such foreign official to use his or her influence with a foreign government or agencies or instrumentalities thereof to affect or influence acts or decisions of such government or agencies or instrumentalities, in order to assist **LUIS ALBERTO CHACIN HADDAD**, and other United States persons, in obtaining and retaining business for and with, and directing business to **LUIS ALBERTO CHACIN HADDAD** and other United States persons, in violation of Title 15, United States Code, Section 78dd-2(i); and

(c) while acting in the territory of United States, to willfully and corruptly make use of the

mails and means and instrumentalities of interstate commerce and do an act in furtherance of an offer, payment, promise to pay, and authorization of the payment of any money, offer, gift, promise to give, and authorization of the giving of anything of value, to a foreign official or to a person, while knowing that all or part of such money or thing of value would be and had been offered, given, and promised to a foreign official, for purposes of: (i) influencing any acts or decisions of such foreign official in his or her official capacity; (ii) inducing such foreign official to do or omit to do any acts in violation of the lawful duty of such official; (iii) securing any improper advantage; and (iv) inducing such foreign official to use his or her influence with a foreign government or agencies or instrumentalities thereof to affect or influence any acts or decisions of such government or agencies or instrumentalities, in order to assist **JESUS RAMON VEROES** in obtaining and retaining business for and with, and directing business to **JESUS RAMON VEROES**, and others, in violation of Title 15, United States Code, Section 78dd-3(a).

PURPOSE OF THE CONSPIRACY

1. The purpose of the conspiracy was for **LUIS ALBERTO CHACIN HADDAD** and **JESUS RAMON VEROES** and their co-conspirators to unlawfully enrich themselves by making corrupt payments to officials at Venezuela's state-owned and state-controlled electric company, Corpoelec, in order to obtain and retain contracts from Corpoelec to supply Corpoelec with equipment.

MANNER AND MEANS OF THE CONSPIRACY

The manner and means by which **LUIS ALBERTO CHACIN HADDAD** and **JESUS RAMON VEROES** and their co-conspirators sought to accomplish the objects and purpose of the conspiracy included, among other things, the following, while in the Southern District of Florida and elsewhere.

2. **LUIS ALBERTO CHACIN HADDAD** and **JESUS RAMON VEROES** discussed with each other and others (a) the need to make bribe or kickback payments to Foreign Official 1 and Foreign Official 2 in order to obtain and retain business from Corpoelec, and (b) the division of profits on the contracts obtained by making corrupt payments to Foreign Official 1 and Foreign Official 2.

3. **LUIS ALBERTO CHACIN HADDAD** and **JESUS RAMON VEROES**, together with others, (a) caused payments on corruptly obtained contracts to be made by Corpoelec through wire transfers to bank accounts in the Southern District of Florida, and (b) caused wire transfers to be made from bank accounts in the Southern District of Florida to other accounts for the ultimate benefit of Corpoelec officials, themselves, and co-conspirators.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish the purpose and objects thereof, **LUIS ALBERTO CHACIN HADDAD** and **JESUS RAMON VEROES** and their 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:

4. On or about May 25, 2016, and June 3, 2016, **LUIS ALBERTO CHACIN HADDAD** and **JESUS RAMON VEROES** caused a U.S.-based company over which **LUIS ALBERTO CHACIN HADDAD** had control to enter into three procurement contracts with Corpoelec, which were signed by Foreign Official 2 in exchange for kickback payments out of proceeds from the Corpoelec contracts.

5. In or around the summer of 2016, during a meeting in the Southern District of Florida, **LUIS ALBERTO CHACIN HADDAD** and **JESUS RAMON VEROES** discussed the

division of profits on the corruptly obtained Corpoelec contracts, including the amount of the kickback payment they needed to make to Foreign Official 2.

6. On or about June 15, 2016, during a meeting in the Southern District of Florida, **LUIS ALBERTO CHACIN HADDAD** discussed with a co-conspirator the division of profits on corruptly obtained Corpoelec contracts.

7. On or about August 24, 2016, **LUIS ALBERTO CHACIN HADDAD** caused a U.S.-based company over which he had control to wire approximately \$71,250 from a bank account in the Southern District of Florida to an overseas bank account for the benefit of Foreign Official 2.

8. On or about March 31, 2017, **LUIS ALBERTO CHACIN HADDAD** caused a U.S.-based company over which he had control to wire approximately \$1,283,492.87 in proceeds from a corruptly obtained contract from a bank account in the Southern District of Florida to the bank account of a U.S.-based company in the Southern District of Florida for the benefit of **JESUS RAMON VEROES**.

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

FORFEITURE
(18 U.S.C. § 981(a)(1)(C))

1. The allegations contained in this Information are re-alleged and incorporated by reference as though fully set forth herein for the purpose of alleging forfeiture to the United States of certain property in which the defendants, **LUIS ALBERTO CHACIN HADDAD** and **JESUS RAMON VEROES**, have an interest.

2. Upon conviction of a conspiracy to commit a felony violation of the Foreign Corrupt Practices Act, Title 15, United States Code, Sections 78dd-2 and 78dd-3, as alleged in this

Information, the defendants shall forfeit to the United States all property, real or personal, which constitutes or is derived from proceeds traceable to such offense, pursuant to Title 18, United States Code, Section 981(a)(1)(C), which is made criminally applicable by Title 28, United States Code, Section 2461(c).

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

Ariana Fajardo Orshan
ARIANA FAJARDO ORSHAN
UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF FLORIDA

By: *Michael B. Nadler*
MICHAEL B. NADLER
ASSISTANT UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF FLORIDA

ROBERT ZINK, ACTING CHIEF
CRIMINAL DIVISION, FRAUD SECTION
U.S. DEPARTMENT OF JUSTICE

By: *Michael B. Nadler for*
JOHN-ALEX ROMANO, TRIAL ATTORNEY
CRIMINAL DIVISION, FRAUD SECTION

DEBORAH L. CONNOR, CHIEF
CRIMINAL DIVISION, MONEY LAUNDERING
& ASSET RECOVERY SECTION

By: *Michael B. Nadler for*
JOSEPH PALAZZO, TRIAL ATTORNEY
CRIMINAL DIVISION, MONEY LAUNDERING
& ASSET RECOVERY SECTION

UNITED STATES OF AMERICA

CASE NO.

vs.

CERTIFICATE OF TRIAL ATTORNEY*

LUIS ALBERTO CHACIN HADDAD, and
 JESUS RAMON VEROES,

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 _____

I do hereby certify that:

- I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
- I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.
- Interpreter: (Yes or No) YES
 List language and/or dialect SPANISH
- This case will take 0 days for the parties to try.
- Please check appropriate category and type of offense listed below:

(Check only one)	(Check only one)
I 0 to 5 days <u> X </u>	Petty _____
II 6 to 10 days _____	Minor _____
II 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) YES
 If yes:
 Magistrate Case No. 19-mj-02352-JJO
 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 Northern Region of the U.S. Attorney's Office prior to October 14, 2003? Yes X No
- 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


 MICHAEL B. NADLER
 ASSISTANT UNITED STATES ATTORNEY
 Florida Bar No. 51264

**PUNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

PENALTY SHEET

Defendant's Name: LUIS ALBERTO CHACIN HADDAD

Case No: _____

Count #: 1

Conspiracy to Commit Offense or to Defraud the United States

Title 18, United States Code, Section 371

*** Max. Penalty:** Five (5) 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.**

**PUNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

PENALTY SHEET

Defendant's Name: JESUS RAMON VEROES

Case No: _____

Count #: 1

Conspiracy to Commit Offense or to Defraud the United States

Title 18, United States Code, Section 371

*** Max. Penalty:** Five (5) 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

UNITED STATES DISTRICT COURT
for the
Southern District of Florida

United States of America)
v.) Case No.
LUIS ALBERTO CHACIN HADDAD and)
JESUS RAMON VEROES,)
Defendants)

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