

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 22-CR-20169-JEM

UNITED STATES OF AMERICA

vs.

ACISCLO VALLADARES URRUELA,

Defendant.

STIPULATED FACTUAL PROFFER IN SUPPORT OF PLEA

If this matter were to proceed to trial, the Government would prove the following facts beyond a reasonable doubt. The Parties agree that these facts, which do not include all facts known to the Government and the Defendant, **ACISCLO VALLADARES URRUELA**, are sufficient to prove the guilt of the Defendant of the above-referenced Information:


Co-conspirator testimony and corroborating evidence would show that the Defendant was employed as a corporate officer of a company operating in Guatemala (hereinafter "Company A"). During the time period of the Information, senior executives of Company A directed the Defendant, in his capacity as corporate officer, to obtain cash to be used for the benefit of Company A. To carry out the executives' instructions, the Defendant agreed with others to engage in a series of transactions that benefited Company A and that involved both Guatemalan and U.S. financial institutions.

These transactions involved money the Defendant knew or should have known to be the proceeds of some kind of unlawful activity. If this matter proceeded to trial, the Government would prove that at least some of the money in fact was derived from, among other things, an


offense against a foreign nation, specifically Guatemala, involving bribery of a public official, or the misappropriation, theft, or embezzlement of public funds by or for the benefit of a public official. Among the transactions undertaken during this scheme, in or about December 2017, the Defendant wired or caused to be wired to entities in the U.S. approximately \$350,000.00. Taking into account the Defendant's salary and earnings as a corporate officer within the time period of the Information, the Defendant personally earned and was personally responsible for engaging in unlawful monetary transactions of at least \$140,000.00 as a part of the offense to which he is pleading guilty.

JUAN ANTONIO GONZALEZ
UNITED STATES ATTORNEY

Date: 7-19-2022

By: 
for WALTER M. NORKIN
ASSISTANT U.S. ATTORNEY

Date: 7/19/2022

By: 
DANIEL GELBER, ESQ.
GERALD GREENBERG, ESQ.
BARBARA R. LLANES, ESQ.
ATTORNEYS FOR DEFENDANT

Date: 7/19/2022

By: 
ACISCLO VALLADARES URRUELA
DEFENDANT