

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
**11-60052-CR-JORDAN/MCALILEY**

CASE NO: \_\_\_\_\_

**50 U.S.C. §1705**

**18 U.S.C. §371**

**18 U.S.C. §554**

**18 U.S.C. §982(a)(1)**

**UNITED STATES OF AMERICA**

**vs.**

**FELIPE ECHEVERRY,  
a/k/a Felipe Valdes,  
DIEGO M. ECHEVERRI,  
AMPARO ECHEVERRI VALDES,  
a/k/a Amparo Echeverry Valdes,  
a/k/a Amparo Echeverry, and  
CARLOS ALFREDO PANTOJA-CORAL,**

Defendants.

\_\_\_\_\_ /

**INDICTMENT**

The Grand Jury charges:

**GENERAL ALLEGATIONS**

At all times material to this Indictment:

**The Statutes and Regulations**

1. The President of the United States of America, by virtue of the International Emergency Economic Powers Act (IEEPA), Title 50, United States Code, Section 1701, et. seq., was granted authority to deal with unusual or extraordinary threats to the national security,

foreign policy and economy of the United States.

2. The International Emergency Economic Powers Act (IEEPA), Title 50, United States Code, Section 1705 makes it a federal offense for a person to violate, conspire to violate or cause a violation of any license, order, regulation or prohibition issued under this chapter.

3. On March 15, 1995, pursuant to IEEPA, the President issued Executive Order 12957 (E.O. 12957) finding that the actions and policies of the Government of Iran constitute an unusual and extraordinary threat to the national security, foreign policy, and economy of the United States, and declared a national emergency to deal with that threat.

4. On May 6, 1995, pursuant to IEEPA, the President issued Executive Order 12959 (E.O. 12959) to take steps with respect to Iran in addition to those set forth in E.O. 12957 of March 15, 1995, to deal with the unusual and extraordinary threat to the national security, foreign policy, and economy of the United States, referred to in that order.

5. In order to implement E.O. 12959, The United States Treasury Department, through the Office of Foreign Assets Control, issued the Iranian Transactions Regulations, Title 31, Code of Federal Regulations, Part 560. These regulations prohibit, among other things, (1) the exportation, reexportation, sale, or supply, directly or indirectly, from the United States or by a United States person, wherever located, of any goods, technology or services, to Iran or the Government of Iran, Title 31, Code of Federal Regulations, Section 560.204, and (2) the exportation, reexportation, sale, or supply of any goods, technology, or services to a person in a third country, undertaken with knowledge or reason to believe that the supply, transshipment or reexportation is intended specifically, directly or indirectly, for Iran or the Government of Iran,

Title 31, Code of Federal Regulations, Section 560.204. Title 31, Code of Federal Regulations, Section 560.203 provides that any transaction by any United States person or within the United States that evades or avoids, or has the purpose of evading or avoiding, or attempts to violate any of the provisions in the Iranian Transactions Regulations is prohibited. Title 31, Code of Federal Regulations, Section 560.314 defines "United States Person" as any United States citizen, permanent resident alien, entity organized under the laws of the United States (including foreign branches), or any person in the United States.

6 On March 8, 1996, the President continued the national emergency with respect to Iran and Executive Orders 12957 and 12959, because the actions and policies of the Government of Iran continue to threaten the national security, foreign policy and economy of the United States.

7. By Notice dated March 5, 1997, the President continued the National Emergency with respect to Iran. In the Notice, the President found that the continuation of the National Emergency with respect to Iran was necessary because the actions and policies of the Government of Iran, including its support for international terrorism, efforts to undermine the Middle East peace process, and the acquisition of weapons of mass destruction and the means to deliver them, continue to be a threat to the national security, foreign policy, and economy of the United States.

8. On August 19, 1997, the President continued the national emergency with respect to Iran and clarified the steps taken in Executive Orders 12957 and 12959, to deal with the unusual and extraordinary threat to the national security, foreign policy and economy of the United States declared in Executive Order 12957 in response to the actions and policies of the

Government of Iran.

9. In accordance with Executive Orders issued by the President of the United States and regulations issued by the United States Treasury Department, Office of Foreign Asset Control, the export, sale, and supply and the attempted export, sale, and supply of goods, technology, and services from the United States to the Islamic Republic of Iran (hereafter "Iran") is prohibited. Executive Order 13059, dated August 19, 1997 and Title 31, Code of Federal Regulations, Sections 560.201, 560.203 and 560.204.

**COUNT 1**

1. Paragraphs 1 through 9 of the General Allegations above are restated and realleged as if fully set forth herein.

2. Beginning on or about January 20, 2011, the exact date being unknown to the Grand Jury, and continuing to on or about March 8, 2011, in Broward County, in the Southern District of Florida, and elsewhere, the defendants,

**FELIPE ECHEVERRY,  
a/k/a Felipe Valdes,  
DIEGO M. ECHEVERRI,  
AMPARO ECHEVERRI VALDES,  
a/k/a Amparo Echeverry Valdes,  
a/k/a Amparo Echeverry, and  
CARLOS ALFREDO PANTOJA-CORAL,**

did knowingly and willfully combine, conspire, confederate and agree with each other and with other persons known and unknown to the Grand Jury, to export and cause the export of goods, that is J 85 jet engines, from the United States which were ultimately destined for delivery to Iran in violation of the embargo imposed upon that country pursuant to Title 50, United States Code, Sections 1701-1706, Executive Orders 12959 and 13059, Title 31, Code of Federal Regulations,

Sections 560.203 and 560.204.

**Object of the Conspiracy**

3. The objects of the conspiracy were:
  - a. to sell J 85 jet engines in the United States for export to the country of Iran;
  - b. to illegally enrich the co-conspirators by unlawfully exporting J 85 jet engines from the United States to Iran by way of Panama;
  - c. to evade the prohibitions of IEEPA;
  - d. to conceal the prohibited activities and transactions from detection by the United States government so as to avoid penalties and disruption of the illegal activity.

**Manner and Means**

4. In furtherance of the conspiracy and to effect the objects thereof, the following manner and means, among others, were used:
  - a. Defendants **FELIPE ECHEVERRY** and **AMPARO ECHEVERRI VALDES** and others used email accounts and other forms of communication to communicate with each other, with other co-conspirators, and with other individuals located in the United States;
  - b. Defendant **FELIPE ECHEVERRY** posted an advertisement on the internet offering twenty-two J 85-CAN-15 jet engines for sale.
  - c. Defendants **AMPARO ECHEVERRI VALDES**, **DIEGO ECHEVERRI**, and **CARLOS ALFREDO PANTOJA CORAL** caused materially false,

misleading and incomplete information to be placed in shipping documents.

**Overt Acts**

5. In furtherance of the conspiracy and to effect the objects thereof, there were committed, in the Southern District of Florida and elsewhere, at least one of the following overt acts, among others:

6. In or about January 2011, **FELIPE ECHEVERRY** posted an advertisement on the internet offering twenty-two J 85-CAN-15 jet engines for sale.

7. On January 24, 2011, **FELIPE ECHEVERRY** had a telephone conversation with a person known to the Grand Jury to discuss the sale of the twenty-two J 85 jet engines and arranged for a meeting with members of **FELIPE ECHEVERRY's** family in Miami, Florida.

8. On February 2, 2011, a person known to the Grand Jury met in Miami, Florida with **DIEGO ECHEVERRI, AMPARO ECHEVERRI VALDES, and CARLOS ALFREDO PANTOJA CORAL** to inspect the J85 engines.

9. On February 9, 2011, **FELIPE ECHEVERRY** sent an email to a person known to the Grand Jury outlining the costs for shipping the twenty-two engines from Miami to Panama and Miami to Kuwait.

10. On February 9, 2011, **FELIPE ECHEVERRY** had a telephone conversation with a person known to the Grand Jury in which it was discussed that shipping the engines to Kuwait would not be an option due to the heavy American presence in the country and the fact Kuwait was too far out of the way from the port of Bandar Abbas in Iran.

11. On February 16, 2011, **DIEGO ECHEVERRI, CARLOS ALFREDO PANTOJA CORAL, AMPARO ECHEVERRI VALDES** met with a person known to the

Grand Jury in Miami, Florida to show the twenty- two J 85 jet engines.

12. On February 17, 2011, **FELIPE ECHEVERRY** and **DIEGO ECHEVERRI** had a telephone conversation with a person known to the Grand Jury and discussed the shipment of the twenty-two J 85 jet engines to Iran through Panama.

13. On February 24, 2011, **FELIPE ECHEVERRY** contacted a person known to the Grand Jury and agreed to accept \$151,000 as a fifty percent deposit for the purchase and shipment of the engines to Panama.

14. On February 28, 2011, **FELIPE ECHEVERRY** sent an email to a person known to the Grand Jury asking if it would be ok to start building crates for packing the engines so they would be ready for shipment on the day of the final meeting.

15. On March 4, 2011, an email was sent to a person known to the Grand Jury on behalf of **AMPARO ECHEVERRI VALDES** containing the shipping arrangements from Miami to Panama.

16. On March 8, 2010, **DIEGO ECHEVERRI**, **AMPARO ECHEVERRI VALDES**, and **CARLOS ALFREDO PANTOJA CORAL** met with a person known to the Grand Jury to execute the Agreement for Sale and finalize the shipping arrangements. **AMPARO ECHEVERRI VALDES** signed the Agreement for Sale and accepted the down payment for twenty-two J-85 engines and the shipping costs to send the engines to Panama for transshipment to Iran.

All in violation of Title 50, United States Code, Section, 1705(a) and (c), Executive Orders 12959 and 13059, and Title 31, Code of Federal Regulations, Sections 560.203 and 560.204;

**COUNT 2**

1. Paragraphs 1- 9 of the General Allegations above are restated and realleged as if fully set forth herein.

2. Paragraphs 1- 16 of the Overt Acts set forth in Count 1 above, are restated and realleged as if fully set forth herein.

3. On or about March 8, 2011, in Broward County, in the Southern District of Florida, and elsewhere, the defendants,

**FELIPE ECHEVERRY,  
a/k/a Felipe Valdes,  
DIEGO M. ECHEVERRI,  
AMPARO ECHEVERRI VALDES,  
a/k/a Amparo Echeverry Valdes,  
a/k/a Amparo Echeverry, and  
CARLOS ALFREDO PANTOJA-CORAL,**

did knowingly and willfully attempt to export and cause to be exported and reexported, goods, that is J 85 jet engines, from the United States to a place outside thereof, that is, Iran, in violation of Title 50, United States Code, Section 1705, Title 31, Code of Federal Regulations, Sections 560.203 and 560.204, and Title 18, United States Code, Section 2.

**COUNT 3**

1. Paragraphs 1- 9 of the General Allegations above are restated and realleged as if fully set forth herein.

2. Paragraphs 1- 16 of the Overt Acts set forth in Count 1 above, are restated and realleged as if fully set forth herein.

3. On or about March 8, 2011, in Broward County, in the Southern District of Florida, and elsewhere, the defendants,



**FELIPE ECHEVERRY,  
a/k/a Felipe Valdes,  
DIEGO M. ECHEVERRI,  
AMPARO ECHEVERRI VALDES,  
a/k/a Amparo Echeverry Valdes,  
a/k/a Amparo Echeverry, and  
CARLOS ALFREDO PANTOJA-CORAL,**

did knowingly and willfully conduct and attempt to conduct a transaction, that is the sale and attempted exportation of J 85 jet engines, for the purpose of evading and avoiding the restrictions set forth in the Iranian Transaction Regulations, in violation of Title 50, United States Code, Section 1705, Title 31, Code of Federal Regulations, Sections 560.203 and 560.204, and Title 18, United States Code, Section 2.

**COUNT 4**

1. Paragraphs 1- 9 of the General Allegations above are restated and realleged as if fully set forth herein.
2. Paragraphs 1- 16 of the Overt Acts set forth in Count 1 above, are restated and realleged as if fully set forth herein.
3. From on or about January 20, 2011 to March 8, 2011, in Broward County and Miami-Dade County, in the Southern District of Florida and elsewhere, the defendants,

**FELIPE ECHEVERRY,  
a/k/a Felipe Valdes,  
DIEGO M. ECHEVERRI,  
AMPARO ECHEVERRI VALDES,  
a/k/a Amparo Echeverry Valdes,  
a/k/a Amparo Echeverry, and  
CARLOS ALFREDO PANTOJA-CORAL,**

did knowingly and willfully combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand jury to fraudulently attempt to export and send from the

United States to Iran, goods, that is J 85 jet engines, contrary to the laws and regulations of the United States, that is Title 50, United States Code, Section 1705 and Title 31, Code of Federal Regulations, Sections 560.203 and 560.204; in violation of Title 18, United States Code, Section 554(a); ; all in violation of Title 18, United States Code, Section 371.

**COUNT 5**

1. Paragraphs 1- 9 of the General Allegations above are restated and realleged as if fully set forth herein.

2. Paragraphs 1- 16 of the Overt Acts set forth in Count 1 above, are restated and realleged as if fully set forth herein.

3. On March 8, 2011, in Broward County and Miami-Dade County, in the Southern District of Florida and elsewhere, the defendants,

**FELIPE ECHEVERRY,  
a/k/a Felipe Valdes,  
DIEGO M. ECHEVERRI,  
AMPARO ECHEVERRI VALDES,  
a/k/a Amparo Echeverry Valdes,  
a/k/a Amparo Echeverry, and  
CARLOS ALFREDO PANTOJA-CORAL,**

did fraudulently attempt to export and send from the United States to Iran, goods, that J 85 jet engines, contrary to the laws and regulations of the United States, that is Title 50, United States Code, Section 1705 and Title 31, Code of Federal Regulations, Sections 560.203 and 560,204; all in violation of Title 18, United States Code, Section 554(a).

**FORFEITURE**

1. The allegations of Counts 1 through 5 of this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of

America of certain property in which the defendants have an interest, pursuant to the provisions of Title 18, United States Code, Section 982(a)(1).

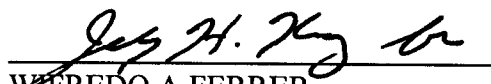
2. Upon conviction of the offenses alleged in any of Counts 1 through 5, the defendants,

**FELIPE ECHEVERRY,  
a/k/a Felipe Valdes,  
DIEGO M. ECHEVERRI,  
AMPARO ECHEVERRI VALDES,  
a/k/a Amparo Echeverry Valdes,  
a/k/a Amparo Echeverry, and  
CARLOS ALFREDO PANTOJA-CORAL,**

shall forfeit to the United States, any property used or intended to be used to commit the offense alleged in Counts 1 through 5, including but not limited to twenty-two J 85 jet engines.

All pursuant to Title 18, United States Code, Section 982(a)(1).

\ A TRUE BILL

  
WILFREDO A FERRER  
UNITED STATES ATTORNEY

  
MICHAEL WALLEISA  
ASSISTANT UNITED STATES ATTORNEY

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

UNITED STATES OF AMERICA

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

vs.

**CERTIFICATE OF TRIAL ATTORNEY\***

**FELIPE ECHEVERRY, et.al** )  
**Defendant.** )

**Superseding Case Information:****Court Division:** (Select One)

New Defendant(s) Yes \_\_\_\_\_ No X  
 Number of New Defendants \_\_\_\_\_  
 Total number of counts 10

X Miami \_\_\_\_\_ Key West  
 FTL \_\_\_\_\_ WPB \_\_\_\_\_ FTP

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) No  
 List language and/or dialect \_\_\_\_\_

- This case will take 5-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	_____
III	11 to 20 days	_____	Misdem.	_____
IV	21 to 60 days	_____	Felony	<u>X</u>
V	61 days and over	_____		

- 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. 11-6153-RSR

Related Miscellaneous numbers: \_\_\_\_\_

Defendant(s) in federal custody as of \_\_\_\_\_

Defendant(s) in state custody as of March 8, 2011

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 WALLEISA**  
 ASSISTANT UNITED STATES ATTORNEY  
 Florida Bar No. 539570

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

Defendant's Name: FELIPE ECHEVERRY

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

**Counts #1 - 3**

Conspiracy and attempt to export goods to Iran

in violation of 50 U.S.C. § 1705

\*Max Penalty: Twenty (20) years' imprisonment; one (3) year of supervised release; \$1,000,000 fine.

**Count #4**

Conspiracy to smuggle goods to Iran

in violation of 18 U.S.C. § 371

\*Max Penalty: Five (5) years' imprisonment; five (3) years of supervised release; \$250,000 fine.

**Counts #5**

Attempt to smuggle goods to Iran

in violation of 18 U.S.C. § 554

\*Max Penalty: Ten (10) years' imprisonment; three (3) years of supervised release; \$250,000 fine.

---

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

REV. 12/12/96

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

Defendant's Name: CARLOS ALFREDO PANTOJA CORAL - Case No.: \_\_\_\_\_

**Counts #1 - 3**

Conspiracy and attempt to export goods to Iran

in violation of 50 U.S.C. § 1705

\*Max Penalty: Twenty (20) years' imprisonment; one (3) year of supervised release; \$1,000,000 fine

**Count #4**

Conspiracy to smuggle goods to Iran

in violation of 18 U.S.C. § 371

\*Max Penalty: Five (5) years' imprisonment; five (3) years of supervised release; \$250,000 fine

**Counts #5**

Attempt to smuggle goods to Iran

in violation of 18 U.S.C. § 554

\*Max Penalty: Ten (10) years' imprisonment; three (3) years of supervised release; \$250,000 fine

---

**\*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: DIEGO M. ECHEVERRY

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

**Counts #1 - 3**

Conspiracy and attempt to export goods to Iran

in violation of 50 U.S.C. § 1705

\*Max Penalty: Twenty (20) years' imprisonment; one (3) year of supervised release; \$1,000,000 fine

**Count #4**

Conspiracy to smuggle goods to Iran

in violation of 18 U.S.C. § 371

\*Max Penalty: Five (5) years' imprisonment; five (3) years of supervised release; \$250,000 fine

**Counts #5**

Attempt to smuggle goods to Iran

in violation of 18 U.S.C. § 554

\*Max Penalty: Ten (10) years' imprisonment; three (3) years of supervised release; \$250,000 fine

---

**\*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: AMPARO ECHEVERRI VALDES Case No.: \_\_\_\_\_

**Counts #1 - 3**

Conspiracy and attempt to export goods to Iran

in violation of 50 U.S.C. § 1705

\*Max Penalty: Twenty (20) years' imprisonment; one (3) year of supervised release; \$1,000,000 fine

**Count #4**

Conspiracy to smuggle goods to Iran

in violation of 18 U.S.C. § 371

\*Max Penalty: Five (5) years' imprisonment; five (3) years of supervised release; \$250,000 fine

**Counts #5**

Attempt to smuggle goods to Iran

in violation of 18 U.S.C. § 554

\*Max Penalty: Ten (10) years' imprisonment; three (3) years of supervised release; \$250,000 fine

---

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