UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.

UNITED STATES OF AMERICA,

Plaintiff,

v.

ONE (1) 2012 ROLLS ROYCE PHANTOM DROPHEAD, BEARING VIN SCA682D53CUX16710,

ONE (1) 2016 FERRARI FF MODEL, BEARING VIN ZFF73SKA0G0215302,

ONE (1) 2017 PORSCHE 911 TURBO COUPE 2D, BEARING VIN WP0AD2A94HS166412, and

ONE (1) 2014 MASERATI QUATTROPORTE, BEARING VIN ZAM56PPA7E1084665,

Defendants *In Rem*.
_____/

VERIFIED COMPLAINT FOR FORFEITURE IN REM

Plaintiff, United States of America, by and through the undersigned Assistant United States Attorney for the Southern District of Florida, hereby files this complaint for forfeiture and alleges as follows:

1. This is a civil action *in rem* for the forfeiture of the following Defendants *In Rem* (collectively, the "Defendant Vehicles") pursuant to18 U.S.C. § 981(a)(1)(C):

a. One (1) 2012 Rolls Royce Phantom Drophead, bearing Vehicle Identification Number ("VIN") SCA682D53CUX16710 (the "Rolls Royce");

b. One (1) 2016 Ferrari FF Model, bearing VIN ZFF73SKA0G0215302 (the "Ferrari");

c. One (1) 2017 Porsche 911 Turbo Coupe 2D, bearing VIN WP0AD2A94HS166412 (the "Porsche"); and

d. One (1) 2014 Maserati Quattroporte, bearing VIN ZAM56PPA7E1084665 (the "Maserati")

2. The Court has jurisdiction over this subject matter pursuant to 28 U.S.C. §§ 1345 and 1355.

3. This Court has *in rem* jurisdiction over the Defendant Vehicles pursuant to 28 U.S.C. § 1355.

4. This Court has venue over this action pursuant to 28 U.S.C. §§ 1355 and 1395.

FACTS

5. On or about August 16, 2018, a federal grand jury in the Southern District of Florida returned a sealed Indictment that charged defendant Raul Gorrin Belisario ("Gorrin"), a Venezuelan national who is presently in Venezuela, on one count of conspiracy to violate the Foreign Corrupt Practices Act ("FCPA") in violation of 18 U.S.C. § 371, one count of conspiracy to commit money laundering in violation of 18 U.S.C. § 1956(h), and nine substantive counts of laundering of monetary instruments in violation of 18 U.S.C. § 1956(a)(2)(A). *See* Case No. 9:18-CR-80160-WPD (S.D. Fla.).

6. As alleged in the Indictment, from in or around 2011 through in or around 2017, Gorrin caused bribe payments totaling at least approximately $94 million to be paid to foreign Venezuelan officials. As part of the criminal investigation, law enforcement agents identified certain assets owned by Gorrin, including the Defendant Vehicles. According to the State of

Florida Department of Highway Safety and Motor Vehicle's Driver and Vehicle Information Database ("DAVID"), as of November 2018, the Defendant Vehicles were owned and registered to Gorrin at an address in Coral Gables, Florida, which is within the Southern District of Florida.

7. In or around November 2018, the Indictment and criminal case were unsealed. The charges against Gorrin garnered widespread media attention, including in local newspapers. *See, e.g.*, Jay Weaver and Antonio Maria Delgado, *Venezuelan TV mogul with U.S. real estate fortune charged in South Florida*, The Miami Herald, Nov. 21, 2018.[1]

8. Between on or about November 30, 2018, and on or about December 3, 2018, shortly after Gorrin's criminal case became public, duplicate certificates of title were issued for the Defendant Vehicles. For the Rolls Royce, the Porsche, and the Maserati, the applications for these duplicate certificates of title were made with Florida driver's license number G287-681-68-140-0, purportedly issued to Gorrin. The applications indicated that the original titles had been "lost." For the Ferrari, there was no driver's license on file, but the application also requested a duplicate certificate of title because the original was "lost," and was signed "RG," purportedly by "Raul A Gorrin."

9. Law enforcement agents searched DAVID and learned that Florida driver's license number G287-681-68-140-0 did not exist. In fact, a check of DAVID revealed that no Florida driver's license has ever been issued to Gorrin. Instead, Gorrin had used a Venezuelan driver's license to purchase the Defendant Vehicles.

10. The false Florida driver's license used to obtain the duplicate titles for the Rolls Royce, the Porsche, and the Maserati contained Gorrin's full name, local address, and date of birth.

[1] https://www.miamiherald.com/news/nation-world/world/americas/venezuela/article221706585.html

However, based on photos of Gorrin online and in a law enforcement database, the photo on the license did not depict Gorrin. In fact, the photo on the driver's license was the same photo used in another fraudulent document, a fake Venezuelan passport recovered in January 2019.

11. According to a Department of Homeland Security database, Gorrin last departed the United States more than a year ago, on or about November 4, 2017, from Opa Locka Airport in Opa Locka, Florida. There was no record of his return to the United States since then.

12. Between on or about November 30, 2018, and on or about December 3, 2018, nominal title to the Defendant Vehicles was transferred to Auto Brokers USA Corp. ("Auto Brokers"), a Florida corporation with a principal address in Homestead, Florida, which is within the Southern District of Florida. Based on records from DAVID, such transfers occurred using the aforementioned duplicate certificates of title and were executed by a person purporting to be Raul Gorrin using the fake Florida driver's license.

13. The signature for the person purporting to be Gorrin on the executed certificates of title for the Defendant Vehicles did not match the signature for Gorrin on certificates of title for other vehicles purchased by Gorrin, or his signature on other documents executed by Gorrin and sent from his e-mail accounts.

14. On or about January 5, 2019, J.D. reported to the Coral Gables Police Department that six luxury vehicles belonging to Gorrin had been stolen. These vehicles included the four Defendant Vehicles, as well as another vehicle. J.D. represented that J.D. was the Defendant Vehicles' caretaker, employed by Gorrin while Gorrin was out of the United States. J.D. told police officers that J.D. had confirmed that Gorrin had not authorized the sale of these vehicles to Auto Brokers.

15. According to the police incident report, J.D. reported that on or about January 3, 2019, J.D. discovered that the vehicles had been taken from a residential building's parking garage. According to public records, Gorrin, through certain shell companies, owned several apartments in the building at that address.

16. J.D. told officers that the building's manager advised J.D. that a person representing Auto Brokers had collected the vehicles and provided the certificates of title indicating that the vehicles had been transferred to Auto Brokers.

17. The incident report also indicated that a Coral Gables police officer directly contacted Gorrin in Venezuela via telephone, and Gorrin advised the officer that he would have a power of attorney document drafted to allow J.D. to represent Gorrin's interest in the police investigation.

18. The Defendant Vehicles are currently located at the following:

a. The Rolls Royce is in the custody of Homeland Security Investigations; and

b. The Ferrari, Porsche, and Maserati are located at Auto Brokers USA Corp., 29951 South Federal Highway, Homestead, Florida 33033

LEGAL BASIS FOR FORFEITURE

19. Title 18, United States Code, Section 1028(a)(1) prohibits knowingly and without lawful authority producing an identification document, authentication feature, or a false identification document.

20. Title 18, United States Code, Section 981(a)(1)(C) provides for the civil forfeiture of "[a]ny property, real or personal, which constitutes or is derived from proceeds traceable to a violation of" Title 18, United States Code, Section 1028.

CLAIM FOR FORFEITURE

21. Based upon the foregoing, the Defendant Assets constitute or are derived from proceeds traceable to a violation of Title 18, United States Code, Section 1028(a)(1) and are therefore subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C).

WHEREFORE, Plaintiff, United States of America requests, that any and all persons having any claim to the Defendant Assets be directed to file and serve their verified claims and answers as required by Rule G(5) of the Supplemental Rules for Certain Admiralty and Maritime Claims, or suffer default thereof, and further requests that the Court declare the Defendant Vehicles condemned and forfeited to the United States of America, and that Plaintiff have such other and further relief as may be just and proper.

Respectfully submitted,

ARIANA FAJARDO ORSHAN
UNITED STATES ATTORNEY

By: */s/ Nicole Grosnoff*

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VERIFICATION

I, Eric Moreno, am a Special Agent of the Department of Homeland Security, Homeland Security Investigations, and I have read the contents of the foregoing Complaint for Forfeiture *In Rem* and declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed July 15, 2019.

Eric Moreno
Special Agent
Homeland Security Investigations