United States District Court
Southern District of Texas
FILED
APR 14 2022
Nathan Ochsner, Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	**Criminal No. M-22-501-S1**
	§	
CHIRAG PATEL	§	
ANTONIO GONZALEZ, III	§	

SEALED SUPERSEDING CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

On or about March 8, 2019, in the Southern District of Texas, the Defendant

CHIRAG PATEL

knowingly and willfully did use and cause to be used a facility in interstate and foreign commerce namely a cellular phone, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, namely money laundering, contrary to Title 18, United States Code, Section 1956 and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of the above unlawful activity.

In violation of Title 18, United States Code, Section 1952(a)(3).

COUNT TWO

On or about January 18, 2018, in the Southern District of Texas, the Defendant

ANTONIO GONZALEZ, III

knowingly and willfully did use and cause to be used a facility in interstate and foreign commerce namely a cellular phone, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, namely bribery,

contrary to Title 18, United States Code, Section 666 and Texas Penal Code § 36.02 and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of the above unlawful activity.

In violation of Title 18, United States Code, Section 1952(a)(3).

NOTICE OF FORFEITURE

Pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code Section 981(a)(1)(C), the United States gives notice to defendant,

CHIRAG PATEL

that in the event of conviction, the United States intends to seek forfeiture of all property, real or personal, constituting, or derived from, any proceeds the person obtained directly or indirectly, as a result of such violation.

The property subject to forfeiture for the offense charged in the Criminal Information includes, but is not limited to, the following property: at least $143,567.47 in United States currency.

Money Judgment

Defendant, Chirag Patel, is notified that upon conviction, a monetary judgment may be imposed equal to the total value of the property subject to forfeiture.

Substitute Assets

Defendant, Chirag Patel, is notified that in the event that property subject to forfeiture, as a result of any act or omission of defendant,

(A) cannot be located upon the exercise of due diligence;

(B) has been transferred or sold to, or deposited with, a third party;

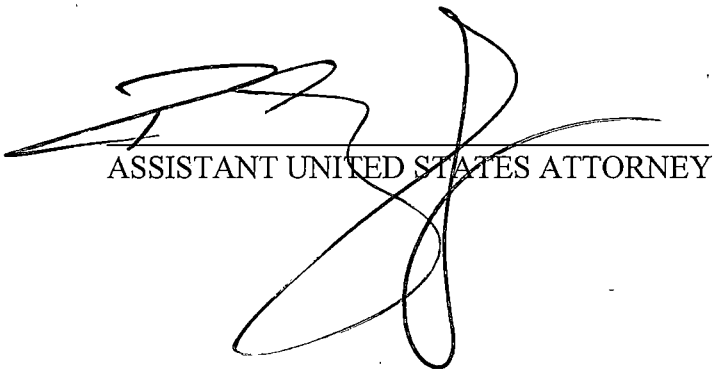
(C) has been placed beyond the jurisdiction of the court;

(D) has been substantially diminished in value; or

(E) has been commingled with other property that cannot be divided without difficulty,

it is the intent of the United States to seek forfeiture of any other property of the defendant up to the total value of such property pursuant to Title 21, United States Code, Section 853(p), incorporated by reference in Title 28, United States Code, Section 2461(c).

JENNIFER B. LOWERY
UNITED STATES ATTORNEY



ASSISTANT UNITED STATES ATTORNEY