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IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff,

v.

RAYMOND RODRIGUEZ-SANTOS
Defendant

INFORMATION

Crim. No. 21 – 465 (RAM)

Violation:

18 U.S.C. § 371 Plus, Forfeiture

THE UNITED STATES CHARGES:

BACKGROUND ALLEGATIONS

1. At all times material to this Information, unless otherwise set forth, with all dates and times alleged to be "on or about" or "in or about" and all amounts alleged to be "approximately":

2. The Commonwealth of Puerto Rico was a self-governing Commonwealth in association with the United States of America. Puerto Rico was divided into 78 administrative divisions called municipalities. Cataño was a municipality within the Commonwealth of Puerto Rico.

3. In each of the calendar years 2020 and 2021, the municipality of Cataño received more than $10,000 in benefits from the United States government under federal programs involving grants, subsidies, loans, guarantees, insurance, and other forms of assistance.

4. Cataño had a form of government which consisted of an elected mayor and municipal legislature. Individual A served as mayor of Cataño from on or around January 14, 2017 until present.

5. As mayor, Individual A was the highest-ranking government official whose responsibilities included but were not limited to: (a) implementing the law; (b) organizing, directing, and supervising all the administrative activities of the municipality; (c) preparing and administering the budget of the municipality; (d) hiring professional or contracting services, when necessary; and (e) supervising, administering, and authorizing the disbursement of funds received by the municipality. Elected mayors of municipalities in Puerto Rico serve four-year terms, and there are no term limits. As mayor, Individual A exercised substantial influence over the administration of the municipality's contracts.

6. Defendant RAYMOND RODRIGUEZ SANTOS ("RODRIGUEZ") was a businessman in Puerto Rico. RODRIGUEZ and Individual B owned or had a financial interest in an asphalt and paving company called Company A.

COUNT 1
Conspiracy; Federal Funds Bribery and Kickbacks
18 U.S.C. § 371

7. The preceding paragraphs of this Information are hereby re-alleged and incorporated in this Count.

Object of the Conspiracy

8. From in or about June 2017, until in or about August 2021, in the District of Puerto Rico, defendant RAYMOND RODRIGUEZ-SANTOS did knowingly and willfully combine, conspire, and agree with others known and unknown to the Government to commit offenses against the United States, including Federal Program Bribery, that is, to corruptly give, offer, and agree to give things of value to Individual A, a public official and agent of Cataño, with the intent of influencing and rewarding Individual A in connection with any business, transaction, and series of transactions of Cataño valued at $5,000 or more as

opportunities arose, that is, municipal contracts. In each of the years 2017, 2018, 2019, 2020, and 2021, the municipality of Cataño received benefits in excess of $10,000.00 under federal programs involving grants, subsidies, loans, guarantees, insurance, and other forms of assistance. All in violation of 18 U.S.C. § 666(a)(2).

Purpose of the Conspiracy

9. The purpose of the conspiracy was for RODRIGUEZ and Individual B to benefit and enrich themselves by securing municipal contracts as opportunities arose by paying Individual A bribes. These municipal contracts included asphalt and paving contracts for Company A.

Manner and Means of the Conspiracy

10. The manner and means by which RODRIGUEZ and Individual B carried out the scheme included, but were not limited to, the following:

11. RODRIGUEZ and Individual B met in secret with Individual A in various locations in or around Cataño to pay cash bribes and kickbacks to Individual A, in exchange for Individual A's performance of official actions favorable to RODRIGUEZ, Individual B, and their business, Company A.

12. RODRIGUEZ and Individual B also paid Individual A by other means, including providing him with Rolex watches, in exchange for Individual A's performance of official actions favorable to RODRIGUEZ, Individual B, and others known to the government, and businesses in which they had financial interests.

Acts in Furtherance of the Conspiracy

13. In furtherance of the conspiracy, and to affect the objects of the conspiracy, the following overt acts, among others, were committed in the District of Puerto Rico:

14. On or about June 7, 2021, RODRIGUEZ made a $14,500 bribe payment to Individual A for the purpose of obtaining future municipal contracts in Cataño for Company A.

15. On or about June 8, 2021, Individual B made a $17,000 bribe payment, which RODRIGUEZ helped to coordinate, to Individual A for the purpose of obtaining future municipal contracts in Cataño for Company A.

16. The bribe payments by RODRIGUEZ and Individual B helped the business they owned, or in which they had a financial interest, earn millions in municipal contracts approved by Individual A, including the following:

Executed On or about:	Contract Number:	Approximate Amount:
09/29/2017	2018-000103	$600,000.00
12/18/2017	2018-000050	$48,162.27
03/13/2018	2018-000224	$115,830.50
03/13/2018	2018-000225	$35,320.00
03/15/2018	2018-000229	$35,452.40
03/15/2018	2018-000230	$24,547.60
06/29/2018	2018-000280	$198,778.80
06/29/2018	2018-000281	$11,426.50
08/01/2018	2019-000081	$119,091.23
08/26/2018	2019-000078	$138,569.81
09/07/2018	2019-000135	$90,731.85
09/27/2018	2019-000141	$10,800.00
09/27/2018	2019-000142	$85,758.75
09/27/2018	2019-000147	$237,510.90
09/27/2018	2019-000148	$24,300.00
09/27/2018	2019-000149	$86,799.60
09/27/2018	2019-000150	$57,490.00
10/04/2018	2019-000156	$597,860.30
10/04/2018	2019-000157	$4,620.00
02/14/2019	2019-000249	$49,094.00
04/01/2019	2019-000194	$326,626.35
04/01/2019	2019-000195	$59,811.00
04/08/2019	2019-000302	$69,519.57
04/08/2019	2019-000303	$55,740.00
04/08/2019	2019-000311	$33,287.10
04/08/2019	2019-000312	$1,680.00

08/02/2019	2020-000131	$20,000.00
08/15/2019	2020-000149	$980.00
08/20/2019	2020-000152	$572,467.25
08/20/2019	2020-000153	$284,019.00
08/20/2019	2020-000154	$69,232.80
08/20/2019	2020-000155	$176,926.15
09/09/2019	2020-000167	$198,000.00
10/07/2019	2020-000201	$171,023.20
10/07/2019	2020-000202	$119,276.30
10/07/2019	2020-000203	$298,344.40
10/11/2019	2020-000188	$966,616.40
12/13/2019	2020-000233	$433,152.50
02/03/2020	2020-000282	$778,017.95
02/20/2020	2020-000282-A	$85,605.00
03/11/2020	2020-000341	$313,622.70
05/19/2020	2020-000340	$349,226.25
06/18/2020	2020-000357	$85,309.20
12/28/2020	2021-000032	$510,932.76
09/01/2020	2021-000108	$744,544.95
09/01/2020	2021-000109	$176,575.00
11/18/2020	2021-000175	$152,929.55
12/03/2020	2021-000115	$16,320.00
07/02/2021	2022-000105	$82,473.27
07/02/2021	2022-000106	$242,500.00
Total		$9,966,903.16

All in violation of 18 U.S.C. § 371.

FORFEITURE ALLEGATION
28 U.S.C. § 2461(c); 18 U.S.C. § 981(a)(1)(C)

17. The preceding paragraphs of this Information are hereby re-alleged and incorporated in this Allegation.

18. Pursuant to 28 U.S.C. § 2461(c) and 18 U.S.C. § 981(a)(1)(C), the United States gives notice to the defendant RAYMOND RODRIGUEZ-SANTOS that in the event of a conviction for the offense charged in Count One of this Information, all property, real or

personal, which represents or is traceable to the gross receipts obtained, directly or indirectly, from such offense, is subject to forfeiture.

Money Judgment

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

Substitute Assets

20. Defendant 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,

the United States will seek to forfeit any other property of Defendant up to the total value of the property subject to forfeiture pursuant to 21 U.S.C. § 853(p), as incorporated by reference in 28 U.S.C. § 2461(c) and 18 U.S.C. § 982(b)(1).

W. STEPHEN MULDROW
United States Attorney

SETH A. ERBE
Chief, Financial Fraud and Public Corruption Section

By: _____

Scott Anderson
Assistant United States Attorney

COREY AMUNDSON
Chief, Public Integrity Section

JOHN D. KELLER
Principal Deputy Chief, Public Integrity Section

By: _____

Ryan R. Crosswell
Trial Attorney