

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
Case No. 24-20132-CR-BLOOM(s)

UNITED STATES OF AMERICA,

v.

PAUL OSWALD MORANI,

Defendant.

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**FACTUAL PROFFER**

Defendant, PAUL OSWALD MORANI (“Defendant”), his counsel, and the United States of America agree that, had this case proceeded to trial, the United States would have proven the following facts beyond a reasonable doubt:

This statement of facts is not intended to constitute a complete statement of all facts known by Defendant, but is a minimum statement of facts intended to provide the necessary factual predicate for his guilty plea and sentencing. The limited purpose of this statement of facts is to demonstrate that there exists a sufficient legal basis for Defendant’s plea of guilty to the charged offense in violation of Title 18, United States Code, Section 1960. The Government submits that had there been a trial in this matter, the Government would have proven each of the essential elements of the charge to which the Defendant is entering his plea.

Starting in or around 2013 through 2024, the defendant incorporated a total of seven (7) corporations in both the Southern District of Florida and elsewhere (hereinafter “Shell Companies”). These Shell Companies were either opened directly by the Defendant, or upon his instructions and orders to other co-conspirators. The evidence will show that these Shell Companies were, in fact, sham fronts without any legitimate business activity. Some of the Shell Companies were listed as being part of the “import or export” business or involved in the “freight

forwarding” industry, these descriptions were, in fact, false and misleading as none of the Shell Companies conducted any legitimate business.

The Defendant also opened many bank accounts associated with the Shell Companies in the Southern District of Florida (hereinafter, “Associated Bank Accounts”). These Associated Bank Accounts were opened either directly by the Defendant or on his instructions and orders to other co-conspirators. Financial records from the banking institutions show that financial activity in these Associated Bank Accounts was grossly disproportionate to the Shell Companies’ claimed annual revenues. For example, from January 2018 through March 2019, the Shell Companies received a combined total of approximately \$ 95.5 million (USD) in electronic (wire) transfer deposits or credits from sources originating in South America, mostly Argentina. These funds were sent in high dollar values to the accounts and were then almost immediately electronically (wire) transferred or withdrawn from the accounts resulting in very low monthly beginning and ending account balances. Many of the incoming wire transfers were in rounded dollar figures. Almost all of the outgoing wire transfers were in high value, rounded dollar figures that were unmatchable to any of the incoming wire transfers.

The evidence will further show that with the Shell Companies and Associated Bank Accounts in place in the Southern District of Florida, the Defendant and his co-conspirators received large quantities of Argentine pesos in Argentina. The Defendant and his co-conspirators created thousands of false invoices in the names of the various Shell Companies that were created by the Defendant and his co-conspirators specifically to facilitate the wire transfer of U.S. dollars from Argentina to the Defendant’s Associated Bank Accounts in the Southern District of Florida. For example, the Defendant ordered his co-conspirators to create fake invoices for one of his Shell Companies that was falsely listed as a “freight forwarder,” by inserting three (3) container numbers that were either false or completely fabricated, knowing that the information contained herein was

false. These fake invoices would support the wire transfers of U.S. Dollars to his Associate Bank Accounts. The Defendant and his co-conspirators would then wire transfer the U.S. dollars from his Associated Bank Accounts in the Southern District of Florida to other locations around the world.

These actions, were in fact, engaging in a money transmitting business and the evidence will show that the Defendant did not have the necessary license to engage in this business.

Some of the proceeds the Defendant earned through this conspiracy were deposited into bank accounts in the United States, including in the Southern District of Florida.

In March of 2022, the Defendant made aware of the requirements for a license to engaging in a money remitting business. Notwithstanding this direct knowledge, the Defendant and his co-conspirators continued to engage in an illegal and unlicensed money transmitting business.

The Parties agree that the above facts, which do not include all the facts known to the Government and the Defendant, are sufficient to prove the guilt of the Defendant in the above-referenced matter.

HAYDEN P. O'BYRNE  
UNITED STATES ATTORNEY

Date: 2.11.2025

By:



ANDREA GOLDBARG  
ASSISTANT UNITED STATES ATTORNEY

Date: 2-11-25

By:



MARSHALL DORE LOUIS, ESQ.  
COUNSEL FOR DEFENDANT

Date: 2/11/25

By:



PAUL OSWALD MORANI  
DEFENDANT