

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

CASE NO. 22-20311-CR-WILLIAMS

UNITED STATES OF AMERICA

v.

CRISTIAN PATRICIO PINTADO GARCIA,

Defendant.

PRELIMINARY ORDER OF FORFEITURE

THIS MATTER is before the Court upon the United States of America's Unopposed Motion for Preliminary Order of Forfeiture ("Motion") [ECF No. 100] against Defendant **CRISTIAN PATRICIO PINTADO GARCIA** (the "Defendant"). The Court has considered the Motion, is otherwise advised in the premises, and finds as follows:

On or around July 14, 2022, a federal grand jury returned an Indictment charging the Defendant, as relevant here, in Count 3 with conspiracy to commit money laundering in violation of 18 U.S.C. § 1956(h), with 18 U.S.C. § 1957 as the object of the conspiracy, among other counts. Indictment, [ECF No. 3]. The Indictment also contained forfeiture allegations, which alleged, in relevant part, that upon conviction of a violation of 18 U.S.C. § 1957, the Defendant shall forfeit to the United States any property, real or personal, involved in such offense, or any property traceable to such property, pursuant to 18 § U.S.C. 982(a)(1). (*See id.* at 16–17).

On April 23, 2025, the Court accepted the Defendant's guilty plea to Count 3 of the Indictment. (*See* Minute Entry, [ECF No. 90]; Plea Agreement ¶ 1, [ECF No. 91]). As part of the guilty plea, the Defendant agreed to the forfeiture of a forfeiture money judgment in the amount of \$2,653,720 in U.S. currency. (*See* Plea Agreement ¶ 10, [ECF No. 91]).

In support of the guilty plea, the Defendant executed a Factual Proffer, and the Court found that there was a factual basis to support the Defendant's conviction. (*See* Factual Proffer, [ECF No. 92]).

As set forth in the Factual Proffer, for several years, the Defendant and others participated in a bribery scheme to pay at least approximately \$2,796,783 in bribes to several Ecuadorian government officials in order to influence those officials in their official capacity and to secure an improper advantage in order to assist the Defendant and others in obtaining and retaining business from two state-owned and state-controlled insurance companies in Ecuador, Seguros Sucre, S.A. ("Seguros Sucre") and Seguros Rocafuerte, S.A. ("Seguros Rocafuerte"). (*See* Factual Proffer at 1 – 2).

The Defendant was a general manager of two companies registered in Panama and Ecuador which operated in Miami, Florida and acted as intermediaries for reinsurance companies (collectively, "Intermediary Company"). (*See id.* at 2). Intermediary Company helped companies, including two U.K.-based reinsurance brokers, H.W. Wood Limited ("H.W. Wood") and Tysers Insurance Brokers Limited (formerly known as and doing business during the relevant period as Integro Insurance Brokers Limited or "Integro"), obtain and retain reinsurance business with Seguros Sucre and Seguros Rocafuerte in exchange for receiving a commission. (*See id.* at 2).

Over the course of several years in an illegal bribery scheme, the Defendant and others, including co-defendants Esteban Eduardo Merlo Hidalgo ("Merlo") and Luis Lenin Maldonado Matute ("Maldonado"), paid at least approximately \$2,796,747 in bribes to several Ecuadorian officials, including Juan Ribas Domenech ("Ribas"), the chairman of Seguros Sucre and Seguros Rocafuerte and advisor to the then-president of Ecuador who had authority over the awarding of Seguros Sucre and Seguros Rocafuerte business during the relevant time period, in order to

influence those officials in their official capacity and to secure an improper advantage in order to assist the Defendant and others in obtaining and retaining business for Intermediary Company, H.W .Wood, and Integro with Seguros Sucre and Seguros Rocafuerte("the Illegal Bribery Scheme"). (*See id.* at 2 – 3). The Defendant understood that the payments he received or caused to be made to or for the benefit of his co-conspirators were derived, in whole or in part, from the proceeds of the illegal bribery scheme and the business Intermediary Company corruptly obtained from Seguros Sucre and Seguros Rocafuerte. (*See id.* at 3).

Through the Illegal Bribery Scheme, accounts in the Defendant's name received approximately \$2,956,720, and the Defendant knew this conduct was unlawful. (*See id.*).

Based on the record in this case, the total value of the property involved in the offense of conviction is \$2,653,720 in U.S. currency, which represents the total amount received through accounts in the Defendant's name less approximately \$303,000 in U.S. currency that was transferred to an account for a co-defendant's benefit, and which sum may be sought as a forfeiture money judgment pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

Accordingly, based on the foregoing, the evidence in the record, and for good cause shown, the Motion [ECF No. 100] is **GRANTED**, and it is hereby **ORDERED** that:

1. Pursuant to 18 § U.S.C. 982(a)(1), and Rule 32.2 of the Federal Rules of Criminal Procedure, a forfeiture money judgment in the amount of \$2,653,720 in U.S. currency is hereby entered against the Defendant.

2. The United States is authorized to conduct any discovery that might be necessary to identify, locate, or dispose of forfeited property, and to resolve any third-party petition, pursuant to Rule 32.2(b)(3), (c)(1)(B) of the Federal Rules of Criminal Procedure and 21 U.S.C. § 853(m).

3. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, this Order is final as to the Defendant.

4. The Court shall retain jurisdiction in this matter for the purpose of enforcing this Order, and pursuant to Rule 32.2(e)(1) of the Federal Rules of Criminal Procedure, shall amend this Order, or enter other orders as necessary, to forfeit additional specific property when identified.

DONE AND ORDERED in Miami, Florida, this 24th day of June 2025.



KATHLEEN M. WILLIAMS
UNITED STATES DISTRICT JUDGE