

SEP 03, 2009

STEVEN M. LARIMORE
CLERK U.S. DIST. CT.
S.D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 00-00899-CR-MORENO(s)(s)

21 U.S.C. § 963
21 U.S.C. § 846
18 U.S.C. § 1956(h)
21 U.S.C. § 952(a)
21 U.S.C. § 841(a)
21 U.S.C. § 853

UNITED STATES OF AMERICA

vs.

CAMILLA BROE,

Defendant.

SECOND SUPERSEDING INDICTMENT

The Grand Jury charges that:

COUNT 1

Beginning in or about January 1995, and continuing thereafter until in or about October 2000, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

CAMILLA BROE,

did knowingly and willfully combine, conspire, confederate, and agree with Fernando Maria Luminati-Tonelli, Michell Luminati-Tonnelli, Fortunato Ivano Cornelli, and other persons known and unknown to the Grand Jury, to import into the United States from a place outside thereof, a Schedule I controlled substance, that is, a mixture and substance containing a detectable amount of 3, 4 Methylenedioxymethamphetamine (MDMA), also known as "ecstasy," in violation of Title 21,

United States Code, Section 952(a); all in violation of Title 21, United States Code, Section 963.

COUNT 2

Beginning in or about January 1995, and continuing thereafter until in or about October 2000, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

CAMILLA BROE,

did knowingly and intentionally combine, conspire, confederate, and agree with Fernando Maria Luminati-Tonelli, Michell Luminati-Tonnelli, Fortunato Ivano Cornelli, and other persons known and unknown to the Grand Jury, to possess with intent to distribute, a Schedule I controlled substance, that is, a mixture and substance containing a detectable amount of 3, 4 Methylenedioxymethamphetamine (MDMA), also known as “ecstasy,” in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846.

COUNT 3

Beginning in or about January 1995, and continuing thereafter until in or about October 2000, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

CAMILLA BROE,

did knowingly and willfully combine, conspire, confederate, and agree with Fernando Maria Luminati-Tonelli, Michell Luminati-Tonnelli, Fortunato Ivano Cornelli, and other persons known and unknown to the Grand Jury, to knowingly transport, transmit, transfer monetary instruments, that is, United States currency, from a place inside the United States to a place outside of the United States, knowing that such transportation, transmission, and transfer is designed in whole or in part to conceal and disguise the nature, location, source, ownership and the control of the proceeds of specified unlawful activity, that is, the felonious importation and possession with intent to distribute

of a controlled substance and listed chemicals (as defined in Section 102 of the Controlled Substances Act) punishable under the laws of the United States, and knowing that the monetary instruments involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i). All in violation of Title 18, United States Code, Section 1956(h).

COUNT 4

On or about June 30, 1997, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

CAMILLA BROE,

did knowingly and intentionally import into the United States, from a place outside thereof, a controlled substance, in violation of Title 21, United States Code, Section 952(a) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 960(b)(3), it is further alleged that this violation involved a mixture and substance containing a detectable amount of 3, 4 Methylendioxyamphetamine (MDMA), also known as "ecstasy," a Schedule I controlled substance.

COUNT 5

On or about July 10, 1997, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

CAMILLA BROE,

did knowingly and intentionally import into the United States, from a place outside thereof, a controlled substance, in violation of Title 21, United States Code, Section 952(a) and Title 18,

United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 960(b)(3), it is further alleged that this violation involved a mixture and substance containing a detectable amount of 3, 4 Methylendioxyamphetamine (MDMA), also known as “ecstasy,” a Schedule I controlled substance.

COUNT 6

On or about October 12, 1997, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

CAMILLA BROE,

did knowingly and intentionally import into the United States, from a place outside thereof, a controlled substance, in violation of Title 21, United States Code, Section 952(a) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 960(b)(3), it is further alleged that this violation involved a mixture and substance containing a detectable amount of 3, 4 Methylendioxyamphetamine (MDMA), also known as “ecstasy,” a Schedule I controlled substance.

COUNT 7

On or about October 31, 1997, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

CAMILLA BROE,

did knowingly and intentionally import into the United States, from a place outside thereof, a controlled substance, in violation of Title 21, United States Code, Section 952(a) and Title 18,

United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 960(b)(3), it is further alleged that this violation involved a mixture and substance containing a detectable amount of 3, 4 Methylendioxyamphetamine (MDMA), also known as "ecstasy," a Schedule I controlled substance.

COUNT 8

On or about November 10, 1997, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

CAMILLA BROE,

did knowingly and intentionally import into the United States, from a place outside thereof, a controlled substance, in violation of Title 21, United States Code, Section 952(a) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 960(b)(3), it is further alleged that this violation involved a mixture and substance containing a detectable amount of 3, 4 Methylendioxyamphetamine (MDMA), also known as "ecstasy," a Schedule I controlled substance.

COUNT 9

On or about November 16, 1997, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

CAMILLA BROE,

utilizing courier A.M.T., did knowingly and intentionally import into the United States, from a place outside thereof, a controlled substance, in violation of Title 21, United States Code, Section 952(a)

and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 960(b)(3), it is further alleged that this violation involved a mixture and substance containing a detectable amount of 3, 4 Methylenedioxyamphetamine (MDMA), also known as "ecstasy," a Schedule I controlled substance.

COUNT 10

On or about November 16, 1997, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

CAMILLA BROE,

utilizing courier C.G., did knowingly and intentionally import into the United States, from a place outside thereof, a controlled substance, in violation of Title 21, United States Code, Section 952(a) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 960(b)(3), it is further alleged that this violation involved a mixture and substance containing a detectable amount of 3, 4 Methylenedioxyamphetamine (MDMA), also known as "ecstasy," a Schedule I controlled substance.

COUNT 11

On or about November 19, 1997, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

CAMILLA BROE,

did knowingly and intentionally import into the United States, from a place outside thereof, a controlled substance, in violation of Title 21, United States Code, Section 952(a) and Title 18,

United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 960(b)(3), it is further alleged that this violation involved a mixture and substance containing a detectable amount of 3, 4 Methylenedioxymethamphetamine (MDMA), also known as “ecstasy,” a Schedule I controlled substance.

COUNT 12

On or about December 12, 1997, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

CAMILLA BROE,

did knowingly and intentionally import into the United States, from a place outside thereof, a controlled substance, in violation of Title 21, United States Code, Section 952(a) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 960(b)(3), it is further alleged that this violation involved a mixture and substance containing a detectable amount of 3, 4 Methylenedioxymethamphetamine (MDMA), also known as “ecstasy,” a Schedule I controlled substance.

COUNT 13

On or about February 22, 1998, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

CAMILLA BROE,

did knowingly and intentionally import into the United States, from a place outside thereof, a controlled substance, in violation of Title 21, United States Code, Section 952(a) and Title 18,

United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 960(b)(3), it is further alleged that this violation involved a mixture and substance containing a detectable amount of 3, 4 Methylenedioxymethamphetamine (MDMA), also known as “ecstasy,” a Schedule I controlled substance.

COUNT 14

On or about February 22, 1998, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

CAMILLA BROE,

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of 3, 4 Methylenedioxymethamphetamine (MDMA), also known as “ecstasy,” a Schedule I controlled substance.

FORFEITURE

1. The allegations contained in Counts 1 through 14 of this indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America of certain property in which the defendant, **CAMILLA BROE**, has an interest pursuant to the provisions of Title 18, United States Code, Section 982 and Title 21, United States Code, Section 853.

2. Upon conviction of the offenses alleged in Count 1 through 14 of this indictment, the

defendant shall forfeit to the United States any property in which the defendant has an interest constituting or derived from, any proceeds which the defendant obtained, directly or indirectly, as the result of such violation; and any property in which the defendant has an interest, which was used, or intended to be used, in any manner or part, to commit, or facilitate the commission of such violation; or any property, real or personal, in which the defendant has an interest, involved in such offense or traceable to such property.

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by reference by Title 18, United States Code, Section 982(b), if any of the above-described forfeitable property, as a result of any act or omission of the 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 which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b) and Title 21, United States Code, Section 853(p), to seek the forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.

4. All in accordance with Title 18, United States Code, Section 982(a)(1) and Title 21, United States Code, Sections 853(a)(1) and (a)(2).

A TRUE BILL

FOREPERSON U 1

Jeffrey H. SLOMAN
JEFFREY H. SLOMAN
ACTING UNITED STATES ATTORNEY

Armando Rosquete
ARMANDO ROSQUETE
ASSISTANT UNITED STATES ATTORNEY

Certified to be true and correct copy of the document on file
Steven M. Larimore, Clerk,
U.S. District Court
Southern District of Florida
By Maldon Clark
Deputy Clerk
Date 9-3-09

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO. 00-00899-CR-MORENO(s)(s)

vs.

CERTIFICATE OF TRIAL ATTORNEY*

CAMILLA BROE,

Defendant.

Superseding Case Information:

Court Division: (Select One)

X Miami ___ Key West
___ FTL ___ WPB ___ FTP

New Defendant(s) Yes ___ No X
Number of New Defendants ___
Total number of counts 14

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.

2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.

3. Interpreter: (Yes or No) No
List language and/or dialect _____

4. This case will take 5 days for the parties to try.

5. Please check appropriate category and type of offense listed below:
(Check only one) (Check only one)

I	0 to 5 days	<u>X</u>	Petty	_____
II	6 to 10 days	_____	Minor	_____
III	11 to 20 days	_____	Misdem.	_____
IV	21 to 60 days	_____	Felony	<u>X</u>
V	61 days and over	_____		

6. Has this case been previously filed in this District Court? (Yes or No) Yes

If yes:

Judge: Federico Moreno Case No. 00-00899-CR(s)
(Attach copy of dispositive order)

Has a complaint been filed in this matter? (Yes or No) No

If yes:

Magistrate Case No. _____

Related Miscellaneous numbers: _____

Defendant(s) in federal custody as of _____

Defendant(s) in state custody as of _____

Rule 20 from the _____ District of _____

Is this a potential death penalty case? (Yes or No) No

7. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to October 14, 2003? ___ Yes X No

8. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to September 1, 2007? ___ Yes X No



ARMANDO ROSQUETE
ASSISTANT UNITED STATES ATTORNEY
Florida Bar No. 0648434

*Penalty Sheet(s) attached

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: CAMILLA BROE **Case No:** 00-00899-CR-FAM(s)(s)

Count 1:

Conspiracy to Import MDMA

Title 21, United States Code, Section 963

***Max. Penalty:** 20 Years' Imprisonment

Count 2:

Conspiracy to Possess with Intent to Distribute MDMA

Title 21, United States Code, Section 846

***Max. Penalty:** 20 Years' Imprisonment

Count 3:

Money Laundering

Title 18, United States Code, Section 1956

***Max. Penalty:** 20 Years' Imprisonment

Counts 4 through 13:

Importation of MDMA

Title 21, United States Code, Section 952(a)

***Max. Penalty:** 20 Years' Imprisonment

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

Count 14:

Possession with Intent to Distribute MDMA

Title 21, United States Code, Section 841(a)(1)

***Max. Penalty:** 20 Years' Imprisonment

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT

for the
Southern District of Florida

United States of America
v.

Camilla Broe,
Defendant.

Case No. 00-00899-CR-FAM(s)(s)

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) Camilla Broe,
who is accused of an offense or violation based on the following document filed with the court:

- Indictment
- Superseding Indictment
- Information
- Superseding Information
- Complaint
- Probation Violation Petition
- Supervised Release Violation Petition
- Violation Notice
- Order of the Court

This offense is briefly described as follows:

Importation of MDMA in violation of Title 21, United States Code, Section 952(a); possession with intent to distribute MDMA in violation of Title 21, United States Code, Section 841(a)(1); conspiracy to import MDMA in violation of Title 21, United States Code, Section 963; conspiracy to possess with intent to distribute MDMA in violation of Title 21, United States Code, Section 846); conspiracy to commit money laundering in violation of Title 18, United States Code, Section 1956(h).

Date:

9/3/09

Issuing officer's signature

Deputy Clerk

City and state:

Miami, Florida

Steven M. Larimore, Clerk of Court / Court Administrator

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____

Date:

Certified to be a true and correct copy of the document on file
Steven M. Larimore, Clerk,
U.S. District Court
Southern District of Florida
By Maldon Clark
Deputy Clerk
Date 9-3-09

Arresting officer's signature

Printed name and title

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NUMBER: 00-00899-CR-FAM(s)(s)

BOND RECOMMENDATION

DEFENDANT: Camilla Broe

Pre-Trial Detention
(Personal Surety) (Corporate Surety) (Cash) (Pre-Trial Detention)

By: 
AUSA: Armando Rosquete

Last Known Address: _____

What Facility: _____

Agent(s): _____

(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (**OTHER**)