

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No: *08-80134-CR-Rejkamp/Hopkins*

18 U.S.C. § 152
18 U.S.C. § 1014
31 U.S.C. § 5324
28 U.S.C. § 2461
18 U.S.C. § 981
18 U.S.C. § 982
18 U.S.C. § 2

UNITED STATES OF AMERICA,
Plaintiff,

vs.

LINDA CASTRE GOSMAN,
a/k/a Lin Gosman,
Linda Castre,
Defendant.

INDICTMENT

The Grand Jury charges:

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

1. Defendant **LINDA CASTRE GOSMAN** held herself out as the spouse of A.G.
2. On or about March 2, 2001, A.G. filed a voluntary bankruptcy pursuant to Chapter 11 of the Bankruptcy Code, case no. 01-30953-BKC-PGH. Chapter 11 bankruptcies are considered "reorganization" bankruptcies. Under the Bankruptcy Code, in a Chapter 11 bankruptcy the debtor (the person who filed for bankruptcy) is given the opportunity to personally reorganize his debts and attempt to pay off his creditors.

3. On or about June 25, 2002, A.G. converted his Chapter 11 reorganization bankruptcy to a Chapter 7 liquidation bankruptcy. Under the Bankruptcy Code, in a Chapter 7 bankruptcy an independent trustee is appointed to marshal and liquidate the debtor's pre-bankruptcy assets and distribute the proceeds to his creditors. On or about July 1, 2002, the United States Bankruptcy Court appointed a Chapter 7 trustee in the A.G. bankruptcy (the "A.G. Bankruptcy Trustee").
4. On or about June 5, 2002, a Complaint was filed commencing an adversary proceeding, case no. 02-3155-BKC-SHF-A, against A.G. and the defendant, **LINDA CASTRE GOSMAN**, as part of A.G.'s bankruptcy case (the "Adversary Proceeding"). An adversary proceeding is a lawsuit filed in the bankruptcy court which is related to the debtor's bankruptcy case. The Complaint alleged, among other things, that certain property which A.G. had transferred to the defendant, **LINDA CASTRE GOSMAN**, was in fact property of the bankruptcy estate of A.G. and should be returned to the estate for distribution to A.G.'s creditors.
5. On or about March 1, 2005, a judgment was issued in the Adversary Proceeding against the defendant, **LINDA CASTRE GOSMAN**, in the amount of \$66,539,181.01 (sixty-six million, five hundred thirty nine thousand, one hundred eighty one dollars and one cent).
6. On or about April 10, 2005, the defendant, **LINDA CASTRE GOSMAN**, rented a storage unit from United Stor-All Centers.
7. On or about April 25, 2005, the defendant, **LINDA CASTRE GOSMAN**, was questioned under oath in a deposition taken as part of the Adversary Proceeding.
8. On or about April 27, 2005, the defendant, **LINDA CASTRE GOSMAN**, rented a storage unit from Public Storage, Inc.

9. On or about June 10, 2005, the defendant, **LINDA CASTRE GOSMAN**, was questioned under oath in a deposition taken as part of the Adversary Proceeding.
10. On or about June 22, 2005, a “break order” issued by the United States Bankruptcy Court was executed at a storage unit at Public Storage, Inc., rented by the defendant, **LINDA CASTRE GOSMAN**. The “break order” allowed the A.G. Bankruptcy Trustee, accompanied by United States Marshals, to enter the storage unit without the knowledge or permission of the defendant, **LINDA CASTRE GOSMAN**. Upon entering the storage unit, the A.G. Bankruptcy Trustee found valuable furniture, artwork, and other significant items.
11. On or about July 1, 2005, a “break order” issued by the United States Bankruptcy Court was executed at Villa Jasmine, a luxury unit within the Colony Hotel, located in Palm Beach, Florida, at which the defendant, **LINDA CASTRE GOSMAN**, resided at that time. A locked safe was found at the residence. On or about July 22, 2005, a “break order” issued by the United States Bankruptcy Court was executed on the safe found at Villa Jasmine. A triple strand Tahitian pearl necklace with a diamond encrusted clasp and a pair of pave and baguette diamond earrings were discovered by the A.G. Bankruptcy Trustee in the Villa Jasmine safe.
12. On or about July 1, 2005, the defendant, **LINDA CASTRE GOSMAN**, moved out of the storage unit she had rented from United Stor-All Centers.
13. On or about September 19, 2005, the defendant, **LINDA CASTRE GOSMAN**, opened EuroBank account -----8901. On or about August 14, 2006, the account was closed by EuroBank.

14. On or about August 7, 2006, the defendant, **LINDA CASTRE GOSMAN**, opened Wachovia Bank account -----9596.
15. Title 31, United States Code, Sections 5311 through 5330, and the regulations promulgated thereunder, include a requirement that a bank file with the United States Department of the Treasury a currency transaction report ("CTR") for each single-day transaction in cash in excess of \$10,000. In preparing CTR's, a bank is required to verify and record the name and address of the individual presenting the transaction, as well as record the identity, account number, and social security or taxpayer identification number, if any, of any person or entity on whose behalf such transaction is to be effected.
16. Structuring occurs when a person, acting alone, or in conjunction with, or on behalf of, other persons, conducts or attempts to conduct one or more transactions in currency, in any amount, at one or more financial institutions, on one or more days, in any manner, for the purpose of evading the reporting requirements of filing a CTR. Structuring includes the practice of subdividing an amount of currency in excess of \$10,000 into amounts of \$10,000 or less and then conducting separate transactions in currency with those amounts in related accounts or over multiple days to evade the requirement of filing a CTR.

COUNT ONE

(False Oath in Bankruptcy)

17. The General Allegations of this Indictment are re-alleged and incorporated herein by reference.
18. On or about April 25, 2005, at Palm Beach County, in the Southern District of Florida, the defendant,

**LINDA CASTRE GOSMAN,
a/k/a Lin Gosman,
Linda Castre,**

did knowingly and fraudulently make a material false oath and account in and in relation to the Chapter 7 bankruptcy of A.G., case number 01-30953-BKC-PGH, filed under Title 11, the Bankruptcy Code, in the United States Bankruptcy Court in the Southern District of Florida, in that she gave false testimony under oath during a deposition taken in the Adversary Proceeding as follows (false statements underlined):

Q: Do you have – other than that Jupiter Self Storage and the U&ME Storage, what other storage facilities do you have?

A: There is an old storage facility I believe it's called Extra Space that I've had for ten years.

Q: Anything else?

A: No.

Q: Other than Extra Space, U&ME and Jupiter Self Storage you have no other storage facilities that you're using now?

A: No.

when in fact, as the defendant, **LINDA CASTRE GOSMAN**, well knew and believed, there was at least one other storage facility that she was using at that time.

All in violation of Title 18, United States Code, Sections 152(2) and 2.

COUNT TWO
(False Oath in Bankruptcy)

19. The General Allegations of this Indictment are re-alleged and incorporated herein by reference.
20. On or about June 10, 2005, at Palm Beach County, in the Southern District of Florida, the defendant,

**LINDA CASTRE GOSMAN,
a/k/a Lin Gosman,
Linda Castre,**

did knowingly and fraudulently make a material false oath and account in and in relation to the Chapter 7 bankruptcy of A.G., case number 01-30953-BKC-PGH, filed under Title 11, the Bankruptcy Code, in the United States Bankruptcy Court in the Southern District of Florida, in that she gave false testimony under oath during a deposition in the Adversary Proceeding as follows (false statements underlined):

- Q: Other than the storage facilities that we've discussed, do you have any other storage facilities anywhere in the world that you rent?
- Q: For the record, we've discussed Extra Space, U & Me, something like Jupiter self storage, and the storage area in Atlanta.
- A: That's all.
- Q: Are there any storage facilities anywhere in the world, other than the ones we've mentioned, that you use, may not be rented in your name, but that you use?
- A: No.

Q: He's including any storage area you may have with your husband, as opposed to just you, individually.

Q: Right, that you use.

A: Right.

Q: We've covered them all?

A: Yes.

when in fact, as the defendant, **LINDA CASTRE GOSMAN**, well knew and believed, there was at least one other storage facility that she was using at that time.

All in violation of Title 18, United States Code, Sections 152(2) and 2.

COUNT THREE
(False Oath in Bankruptcy)

21. The General Allegations of this Indictment are re-alleged and incorporated herein by reference.
22. On or about June 10, 2005, at Palm Beach County, in the Southern District of Florida, the defendant,

**LINDA CASTRE GOSMAN,
a/k/a Lin Gosman,
Linda Castre,**

did knowingly and fraudulently make a material false oath and account in and in relation to the Chapter 7 bankruptcy of A.G., case number 01-30953-BKC-PGH, filed under Title 11, the Bankruptcy Code, in the United States Bankruptcy Court in the Southern District of Florida, in that she gave false testimony under oath during a deposition in the Adversary Proceeding as follows (false statements underlined):

Q: Other than the property that is presently in the possession of the trustee, do you own any other furniture, other than the property in the possession of the trustee?

A: No.

when in fact, as the defendant, **LINDA CASTRE GOSMAN**, well knew and believed, she owned other furniture that was not in the possession of the A.G. Bankruptcy Trustee.

All in violation of Title 18, United States Code, Sections 152(2) and 2.

COUNT FOUR
(False Oath in Bankruptcy)

23. The General Allegations of this Indictment are re-alleged and incorporated herein by reference.
24. On or about June 10, 2005, at Palm Beach County, in the Southern District of Florida, the defendant,

**LINDA CASTRE GOSMAN,
a/k/a Lin Gosman,
Linda Castre,**

did knowingly and fraudulently make a material false oath and account in and in relation to the Chapter 7 bankruptcy of A.G., case number 01-30953-BKC-PGH, filed under Title 11, the Bankruptcy Code, in the United States Bankruptcy Court in the Southern District of Florida, in that she gave false testimony under oath during a deposition in the Adversary Proceeding as follows (false statements underlined):

Q: Okay. What about artwork, other than what's in the possession of the trustee, is there any artwork that you own?

A: No.

Q: There's none in any storage facilities?

Q: Just so we're clear, the artwork, we've already – there's already a written stipulation on the artwork that A.G. agreed to buy.

Q: Right, other than that.

Q: Assuming you aren't talking about that.

Q: Other than that and anything that may be in the possession of the trustee, is there any other artwork that you own?

Q: Okay. Now, let's do this, just so we're clear, let's get a definition of what artwork is with a dollar limit, so that, for example, if she's got a like a flower pot picture on something, that we're not talking – that's \$8.50, it's not artwork.

Q: Anything over a hundred dollars in value.

A: No.

when in fact, as the defendant, **LINDA CASTRE GOSMAN**, well knew and believed, she owned other artwork that was not in the possession of the A.G. Bankruptcy Trustee.

All in violation of Title 18, United States Code, Sections 152(2) and 2.

COUNT FIVE
(False Oath in Bankruptcy)

25. The General Allegations of this Indictment are re-alleged and incorporated herein by reference.

26. On or about June 10, 2005, at Palm Beach County, in the Southern District of Florida, the defendant,

**LINDA CASTRE GOSMAN,
a/k/a Lin Gosman,
Linda Castre,**

did knowingly and fraudulently make material false oaths and accounts in and in relation to the Chapter 7 bankruptcy of A.G., case number 01-30953-BKC-PGH, filed under Title 11, the Bankruptcy Code, in the United States Bankruptcy Court in the Southern District of Florida, in that she gave false testimony under oath during a deposition in the Adversary Proceeding as follows (false statements underlined):

Q: Other than what's in the possession of the trustee, what jewelry do you presently own?

A: Nothing.

Q: You have those earring on.

A: My earrings.

Defendant Attorney Q: Are you talking about those little earrings that look like costume jewelry and are probably worth about 12 bucks each?

Q: How much are they?

Defendant Attorney Q: Wait, wait, hold on, let me do one thing. I assumed, and I didn't object, because I assumed you were talking about real jewelry rather than costume jewelry when you asked your question.

Q: Yes.

Defendant Attorney Q: Was I mistaken in that?

Q: No, real jewelry is fine.

Q: What are those earrings made of that you're wearing?

A: They're gold.

Q: How much did you pay for them?

A: They were a gift, I don't know.

Q: When did – when did you receive them?

A: Years and years ago.

Q: From whom?

A: From a friend of mine for my birthday.

Q: Are there diamonds in them, as well?

A: I think they're little –

Defendant Attorney Q: Baguette is what they're called.

A: They're little.

Q: Other than the earrings you're wearing, what other jewelry do you own?

A: I have a – a gold wedding band.

Q: You don't know where your wedding band is?

A: I don't.

Q: When was the last time you saw it?

A: I think it's at the Colony and maybe it's in one of the drawers, I'm not sure.

Q: Other than the earrings you're wearing and the gold wedding band, what other jewelry do you own?

A: Nothing.

Q: That's it?

Defendant Attorney Q: You mean other than what the trustee has already taken?

Q: Other than what is in the possession of the trustee.

A: Nothing.

Defendant Attorney Q: And, again, we're talking real jewelry as opposed to costume jewelry.

Q: Non-costume jewelry.

A: Right.

Q: You don't own any other pairs of earrings?

A: No.

Q: You don't own any other rings?

A: No.

Q: You don't own any bracelets?

A: No.

Q: Necklaces?

A: No.

Q: Toe rings, any other jewelry?

Defendant Attorney Q: I'm sorry, I apologize. Hold on. No, we'll stipulate there's no toe rings.

when in fact, as the defendant, **LINDA CASTRE GOSMAN**, well knew and believed, she owned other jewelry that was not in the possession of the A.G. Bankruptcy Trustee.

All in violation of Title 18, United States Code, Sections 152(2) and 2.

COUNT SIX
(Bank Loan Application Fraud)

27. The General Allegations of this Indictment are re-alleged and incorporated herein by reference.
28. On or about December 29, 2004, at Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

LINDA CASTRE GOSMAN,

a/k/a Lin Gosman,

Linda Castre,

did knowingly make and cause to be made a false statement, for the purpose of influencing the actions of a financial institution, to wit, Washington Mutual Bank, FA, the accounts of which were insured by the Federal Deposit Insurance Corporation, in connection with a \$1,140,000.00 (one million, one hundred forty thousand dollar) mortgage loan for certain property located on South Flagler Drive, West Palm Beach, Florida, in that on her application for the mortgage loan the defendant, **LINDA CASTRE GOSMAN**, claimed she was not a party to a lawsuit when in fact, as the defendant,

LINDA CASTRE GOSMAN, well knew and believed, she was a party to the Adversary Proceeding.

All in violation of Title 18, United States Code, Sections 1014 and 2.

COUNT SEVEN
(Bank Loan Application Fraud)

29. The General Allegations of this Indictment are re-alleged and incorporated herein by reference.
30. On or about March 30, 2005, at Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

LINDA CASTRE GOSMAN,
a/k/a Lin Gosman,
Linda Castre,

did knowingly make and cause to be made a false statement, for the purpose of influencing the actions of a financial institution, to wit, Washington Mutual Bank, FA, the accounts of which were insured by the Federal Deposit Insurance Corporation, in connection with a \$350,000.00 (three hundred fifty thousand dollar) refinancing cashback mortgage loan on certain property located on Sea Steppes Court, Jupiter Florida, in that on her application for the loan the defendant, **LINDA CASTRE GOSMAN**, claimed there were no outstanding judgments against her when in fact, as the defendant, **LINDA CASTRE GOSMAN**, well knew and believed, there was a \$66,539,181.01 (sixty-six million, five hundred thirty nine thousand, one hundred eighty one dollars and one cent) outstanding judgment against her in the Adversary Proceeding.

All in violation of Title 18, United States Code, Sections 1014 and 2.

COUNT EIGHT
(Structuring Currency Transactions)

- 31. The General Allegations of this Indictment are re-alleged and incorporated herein by reference.
- 32. On or about September 26, 2005, a \$24,980.00 international wire transfer from Sender: Swiss Bank Corporation, Originator: Charm Enterprises, Ltd., Tortola BVI, was deposited into EuroBank account number -----8901 in the United States.
- 33. From on or about September 26, 2005, to on or about October 31, 2005, at Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

LINDA CASTRE GOSMAN,
a/k/a Lin Gosman,
Linda Castre,

as part of a pattern of illegal activity involving more than \$100,000 in a 12 month period, did knowingly and for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a), and the regulations promulgated thereunder, structure and assist in structuring transactions with domestic financial institutions, that is, the following withdrawals of cash from EuroBank account number -----8901, on or about the following dates:

DATE	AMOUNT
September 30, 2005	\$9,500.00
October 11, 2005	\$9,900.00

All in violation of Title 31, United States Code, Section 5324(a)(3) and (d)(2); Title 31, Code of Federal Regulations, Section 103.11; and Title 18, United States Code, Section 2.

COUNT NINE

(Structuring Currency Transactions)

34. The General Allegations of this Indictment are re-alleged and incorporated herein by reference.
35. On or about November 1, 2005, a \$39,980.00 international wire transfer from Sender: Swiss Bank Corporation, Originator: Charm Enterprises, Ltd., Tortola BVI, was deposited into EuroBank account number -----8901 in the United States.
36. From on or about November 1, 2005, to on or about January 29, 2006 at Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

**LINDA CASTRE GOSMAN,
a/k/a Lin Gosman,
Linda Castre,**

as part of a pattern of illegal activity involving more than \$100,000 in a 12 month period, did knowingly and for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a), and the regulations promulgated thereunder, structure and assist in structuring, transactions with domestic financial institutions, that is, the following withdrawals of cash from EuroBank account number -----8901, on or about

the following dates:

DATE	AMOUNT
November 2, 2005	\$9,500.00
November 4, 2005	\$5,000.00
December 2, 2005	\$9,500.00
December 7, 2005	\$9,000.00

All in violation of Title 31, United States Code, Section 5324(a)(3) and (d)(2); Title 31, Code of Federal Regulations, Section 103.11; and Title 18, United States Code, Section 2.

COUNT TEN
(Structuring Currency Transactions)

37. The General Allegations of this Indictment are re-alleged and incorporated herein by reference.
38. On or about January 30, 2006, a \$59,980.00 international wire transfer from Sender: Swiss Bank Corporation, Originator: Charm Enterprises, Ltd., Tortola BVI, was deposited into EuroBank account number -----8901 in the United States.
39. From on or about January 30, 2006, to on or about April 3, 2006, at Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

**LINDA CASTRE GOSMAN,
a/k/a Lin Gosman,
Linda Castre,**

as part of a pattern of illegal activity involving more than \$100,000 in a 12 month period, did knowingly and for the purpose of evading the reporting requirements of Title 31,

United States Code, Section 5313(a), and the regulations promulgated thereunder, structure and assist in structuring, transactions with domestic financial institutions, that is, the following withdrawals of cash from EuroBank account number -----8901, on or about the following dates:

DATE	AMOUNT
January 30, 2006	\$9,900.00
February 3, 2006	\$9,500.00
February 14, 2006	\$9,500.00
February 24, 2006	\$9,500.00
March 10, 2006	\$9,000.00

All in violation of Title 31, United States Code, Section 5324(a)(3) and (d)(2); Title 31, Code of Federal Regulations, Section 103.11; and Title 18, United States Code, Section 2.

COUNT ELEVEN
(Structuring Currency Transactions)

40. The General Allegations of this Indictment are re-alleged and incorporated herein by reference.
41. On or about April 4, 2006, a \$24,980.00 international wire transfer from Sender: Swiss Bank Corporation, Originator: Charm Enterprises, Ltd., Tortola BVI, was deposited into EuroBank account number -----8901 in the United States.

42. From on or about April 4, 2006, to on or about June 7, 2006 at Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

**LINDA CASTRE GOSMAN,
a/k/a Lin Gosman,
Linda Castre,**

as part of a pattern of illegal activity involving more than \$100,000 in a 12 month period, did knowingly and for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a), and the regulations promulgated thereunder, structure and assist in structuring, transactions with domestic financial institutions, that is, the following withdrawals of cash from EuroBank account number -----8901, on or about the following dates:

DATE	AMOUNT
April 11, 2006	\$9,000.00
April 25, 2006	\$9,000.00

All in violation of Title 31, United States Code, Section 5324(a)(3) and (d)(2); Title 31, Code of Federal Regulations, Section 103.11; and Title 18, United States Code, Section 2.

COUNT TWELVE
(Structuring Currency Transactions)

43. The General Allegations of this Indictment are re-alleged and incorporated herein by reference.

44. On or about June 8, 2006, a \$49,980.00 international wire transfer from Sender: Swiss Bank Corporation, Originator: Charm Enterprises, Ltd., Tortola BVI, was deposited into EuroBank account number -----8901 in the United States.
45. From on or about June 8, 2006, to on or about July 11, 2006 at Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

**LINDA CASTRE GOSMAN,
a/k/a Lin Gosman,
Linda Castre,**

as part of a pattern of illegal activity involving more than \$100,000 in a 12 month period, did knowingly and for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a), and the regulations promulgated thereunder, structure and assist in structuring, transactions with domestic financial institutions, that is, the following withdrawals of cash from EuroBank account number -----8901, on or about the following dates:

DATE	AMOUNT
June 9, 2006	\$9,500.00
June 12, 2006	\$9,500.00
June 16, 2006	\$9,500.00
July 5, 2006	\$5,000.00

All in violation of Title 31, United States Code, Section 5324(a)(3) and (d)(2); Title 31, Code of Federal Regulations, Section 103.11; and Title 18, United States Code, Section 2.

COUNT THIRTEEN
(Structuring Currency Transactions)

46. The General Allegations of this Indictment are re-alleged and incorporated herein by reference.
47. On or about July 12, 2006, a \$39,980.00 international wire transfer from Sender: Swiss Bank Corporation, Originator: Charm Enterprises, Ltd., Tortola BVI, was deposited into EuroBank account number -----8901 in the United States.
48. From on or about July 12, 2006, to on or about August 14, 2006, at Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

**LINDA CASTRE GOSMAN,
a/k/a Lin Gosman,
Linda Castre,**

as part of a pattern of illegal activity involving more than \$100,000 in a 12 month period, did knowingly and for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a), and the regulations promulgated thereunder, structure and assist in structuring, transactions with domestic financial institutions, that is, the following withdrawals of cash from EuroBank account number -----8901, on or about

the following dates:

DATE	AMOUNT
July 17, 2006	\$9,500.00
July 31, 2006	\$9,500.00
August 7, 2006	\$9,500.00
August 11, 2006	\$9,000.00

All in violation of Title 31, United States Code, Section 5324(a)(3) and (d)(2); Title 31, Code of Federal Regulations, Section 103.11; and Title 18, United States Code, Section 2.

COUNT FOURTEEN
(Structuring Currency Transactions)

49. The General Allegations of this Indictment are re-alleged and incorporated herein by reference.
50. On or about September 11, 2006, a \$51,426.11 international wire transfer from Sender: Swiss Bank Corporation, Originator: Charm Enterprises, Ltd., Tortola BVI, was deposited into Wachovia account number -----9596 in the United States.
51. From on or about September 11, 2006, to on or about October 19, 2006, at Broward County, in the Southern District of Florida, and elsewhere, the defendant,

**LINDA CASTRE GOSMAN,
a/k/a Lin Gosman,
Linda Castre,**

as part of a pattern of illegal activity involving more than \$100,000 in a 12 month period, did knowingly and for the purpose of evading the reporting requirements of Title 31,

United States Code, Section 5313(a), and the regulations promulgated thereunder, structure and assist in structuring, transactions with domestic financial institutions, that is, the following withdrawals of cash from Wachovia Bank, account number -----9596, on or about the following dates:

DATE	AMOUNT
September 12, 2006	\$9,500.00
September 22, 2006	\$9,000.00
September 27, 2006	\$9,500.00
September 29, 2006	\$9,000.00
October 2, 2006	\$9,500.00
October 5, 2006	\$3,300.00

All in violation of Title 31, United States Code, Section 5324(a)(3) and (d)(2); Title 31, Code of Federal Regulations, Section 103.11; and Title 18, United States Code, Section 2.

COUNT FIFTEEN
(Structuring Currency Transactions)

52. The General Allegations of this Indictment are re-alleged and incorporated herein by reference.
53. On or about October 20, 2006, a \$53,000.00 international wire transfer from Sender: Brown Brothers Harriman & Co/Citibank, Originator: Time Worldwide Ventures Ltd., Tortola BVI, was deposited into Wachovia account number -----9596 in the United States.

54. From on or about October 20, 2006, to on or about December 13, 2006, at Broward County, in the Southern District of Florida, and elsewhere, the defendant,

**LINDA CASTRE GOSMAN,
a/k/a Lin Gosman,
Linda Castre,**

as part of a pattern of illegal activity involving more than \$100,000 in a 12 month period, did knowingly and for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a), and the regulations promulgated thereunder, structure and assist in structuring, transactions with domestic financial institutions, that is, the following withdrawals of cash from Wachovia Bank, account number -----9596, on or about the following dates:

DATE	AMOUNT
October 17, 2006	\$9,500.00
October 31, 2006	\$9,500.00
November 2, 2006	\$4,000.00
November 10, 2006	\$4,000.00
November 16, 2006	\$5,000.00
November 17, 2006	\$2,000.00
December 1, 2006	\$5,000.00

All in violation of Title 31, United States Code, Section 5324(a)(3) and (d)(2); Title 31, Code of Federal Regulations, Section 103.11; and Title 18, United States Code, Section 2.

COUNT SIXTEEN
(Structuring Currency Transactions)

55. The General Allegations of this Indictment are re-alleged and incorporated herein by reference.
56. On or about December 14, 2006, a \$75,000.00 international wire transfer from Sender: Brown Brothers Harriman & Co/Citibank, Originator: Time Worldwide Ventures Ltd., Tortola BVI, was deposited into Wachovia account number -----9596 in the United States.
57. From on or about December 14, 2006, to on or about March 15, 2007, at Broward County, in the Southern District of Florida, and elsewhere, the defendant,

**LINDA CASTRE GOSMAN,
a/k/a Lin Gosman,
Linda Castre,**

as part of a pattern of illegal activity involving more than \$100,000 in a 12 month period, did knowingly and for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a), and the regulations promulgated thereunder, structure and assist in structuring, transactions with domestic financial institutions, that is, the following withdrawals of cash from Wachovia Bank account number -----9596, on or

about the following dates:

DATE	AMOUNT
December 21, 2006	\$4,999.00
December 22, 2006	\$4,500.00
December 28, 2006	\$4,500.00
January 3, 2007	\$6,500.00
January 9, 2007	\$4,500.00
January 18, 2007	\$4,500.00
January 29, 2007	\$9,500.00
January 31, 2007	\$4,000.00
February 9, 2007	\$4,500.00
February 16, 2007	\$4,500.00
February 27, 2007	\$9,500.00
February 28, 2007	\$4,900.00

All in violation of Title 31, United States Code, Section 5324(a)(3) and (d)(2); Title 31, Code of Federal Regulations, Section 103.11; and Title 18, United States Code, Section 2.

CRIMINAL FORFEITURE

FORFEITURE ONE

58. Upon conviction of the violation alleged in Count Seven of this indictment, the defendant,

**LINDA CASTRE GOSMAN,
a/k/a Lin Gosman,
Linda Castre,**

shall forfeit to the United States any property constituting, or derived from, proceeds she obtained directly or indirectly as a result of the said violation, including but not limited to at least, the following:

- a. the sum of \$350,000.00 in United States currency.

All pursuant to Title 18, United States Code, Section 982(a)(2).

59. If any of the forfeitable property described in the forfeiture section of this indictment, as a result of any act or omission of the defendant,

**LINDA CASTRE GOSMAN,
a/k/a Lin Gosman,
Linda Castre,**

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (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 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), to seek

forfeiture of any other property of the defendant up to the value of the above forfeitable property.

All pursuant to Title 18 United States Code, Section 982 and Title 21 United States Code, Section 853.

FORFEITURE TWO

60. Upon conviction of the violations alleged in Counts Eight through Sixteen of this indictment, the defendant,

**LINDA CASTRE GOSMAN,
a/k/a Lin Gosman,
Linda Castre,**

shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the violations, including, but not limited to at least, the following:

- a. the sum of \$343,999 in United States currency.

All pursuant to Title 28, United States Code, Section 2461, Title 18, United States Code, Section 981(a)(1)(C), and Title 21, United States Code, Section 853.

61. If the property described above as being subject to forfeiture, as a result of any act or omission of the defendant,

**LINDA CASTRE GOSMAN,
a/k/a Lin Gosman,
Linda Castre,**

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with a third person;
- (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 21, United States Code, Section 853(p) to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

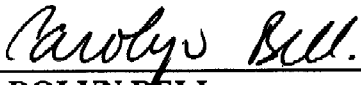
All pursuant to Title 28 United States Code, Section 2461, Title 18, United States Code, Section 981(a)(1)(C), and Title 21 United States Code, Section 853.

A TRUE BILL

FOREPERSON



R. ALEXANDER ACOSTA
UNITED STATES ATTORNEY



CAROLYN BELL
ASSISTANT UNITED STATES ATTORNEY



LYNN ROSENTHAL
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES OF AMERICA

CASE NO.

08-80134-CR-Bystromp/Hopkins

vs.

CERTIFICATE OF TRIAL ATTORNEY*

LINDA CASTRE GOSMAN,
aka LIN GOSMAN, aka LINDA CASTRE,

Defendant.

Superseding Case Information:

Court Division: (Select One)

New Defendant(s) Yes _____ No _____
Number of New Defendants _____
Total number of counts _____

_____ Miami _____ Key West
_____ FTL X WPB _____ FTP

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 10 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 _____	Petty _____
II 6 to 10 days <u>10</u> _____	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) No

If yes: Judge: _____ Case No. _____
(Attach copy of dispositive order)

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

If yes: Magistrate Case No. _____

Related Miscellaneous numbers: None

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 No 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 No No

Carolyn Bell

CAROLYN BELL
ASSISTANT UNITED STATES ATTORNEY
Admin. No./Court No. A5500286

*Penalty Sheet(s) attached

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: LINDA CASTRE GOSMAN, aka LIN GOSMAN, aka LINDA CASTRE

Case No: 08-80134-CR-Ryskamp/Hopkins

Count 1-5:

False oath in bankruptcy

Title 18, United States Code, Section 152(2)

***Max. Penalty:** 5 Years Imprisonment; \$250,000.00 fine, restitution
not more than 3 years supervised release

Count 6-7:

Loan application fraud

Title 18, United States Code, Section 1014

***Max. Penalty:** 30Years Imprisonment; \$1,000,000.00 fine, restitution
not more that 5 years supervised release

Count 8-16:

Structuring

Title 31, United States Code, Section 5324(a)(3) and (d)(2)

***Max. Penalty:** 10 Years Imprisonment; \$500,000.00 fine, restitution
not more that 3 years supervised release