

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

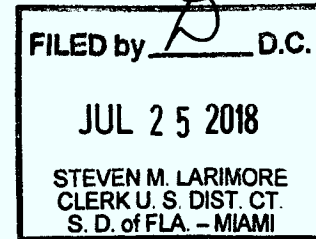
CASE NO. 18-20255-CR-CMA(s)

UNITED STATES OF AMERICA

-vs-

GUILLERMO RAVELO,

Defendant.



SUPERSEDING INFORMATION

The United States Attorney charges that:

GENERAL ALLEGATIONS

At all times relevant to this Superseding Information:

1. The Village of Biscayne Park Police Department (BPPD) was a law enforcement agency within the State of Florida responsible for enforcing state statutes and municipal ordinances within municipal boundaries in the Southern District of Florida. The BPPD was staffed by a force of approximately eleven full-time sworn police officers and approximately ten reserve sworn police officers.
2. Co-conspirator R.A. was a supervisor for the BPPD.
3. Defendant **GUILLERMO RAVELO** was a full-time police officer for the BPPD.
4. C.D. was arrested on or about January 23, 2013, on felony charges including residential burglaries that occurred on or about January 12, 2013 within the municipality of the Village of Biscayne Park.

5. E.B. was arrested on February 26, 2014, on felony charges including five separate burglaries to unoccupied conveyances that occurred on or about February 7, 2014 and February 8, 2014 within the municipality of the Village of Biscayne Park.

COUNT ONE
Deprivation of Rights Under Color of Law
(18 U.S.C. § 242)

On or about April 7, 2013, in Miami-Dade County, in the Southern District of Florida,
the defendant,

GUILLERMO RAVELO,

while employed as a police officer with the Village of Biscayne Park Police Department and acting under color of law, willfully deprived J.P. of the right, secured and protected by the Constitution and laws of the United States, to be free from unreasonable seizures by one acting under color of law, which includes the right to be free from the use of excessive force. Specifically, **RAVELO** assaulted J.P. during a traffic stop by striking J.P. with a closed fist when J.P. was handcuffed and compliant, resulting in bodily injury to J.P.

All in violation of Title 18, United States Code, Section 242.

COUNT TWO
Conspiracy Against Rights
18 U.S.C. § 241

1. Paragraphs 1 through 5 of the General Allegations section are re-alleged and incorporated fully herein by reference.

2. From on or about January 23, 2013 to on or about February 26, 2014, in Miami-Dade County, in the Southern District of Florida, the defendant,

GUILLERMO RAVELO,

acting under color of law, and with other persons known and unknown to the Grand Jury, willfully combined, conspired, and agreed to injure, oppress, threaten, and intimidate any person in the free exercise and enjoyment of a right secured and protected by the Constitution and laws of the United States, namely, the right to be free from unreasonable seizures by persons acting under color of law.

PURPOSE OF THE CONSPIRACY

It was the purpose of the conspiracy for the defendant and his co-conspirators to injure, oppress, threaten and intimidate persons in the free exercise and enjoyment of a right secured and protected by the Constitution and laws of the United States, namely, the right to be free from unreasonable seizures by people acting under color of law.

MANNER AND MEANS OF THE CONSPIRACY

The manner and means by which the defendant and his co-conspirators sought to accomplish the objects and purpose of the conspiracy, included, among other things, the following:

3. As a supervisor for the BPPD, R.A. caused and encouraged officers to arrest persons without a legal basis in order to have arrests effectuated for all reported burglaries. The existence of this fictitious 100% clearance rate of reported burglaries was used by R.A. to gain favor with elected officials and concerned citizens.

4. R.A. instructed Defendant **GUILLERMO RAVELO** to falsely arrest and charge C.D. with unsolved residential burglaries.

5. **GUILLERMO RAVELO**, in compliance with R.A.'s order, signed two arrest affidavits with false narratives to unlawfully charge C.D. with two unsolved residential burglaries.

6. R.A. instructed Defendant **GUILLERMO RAVELO** to falsely arrest and charge E.B. with five unsolved vehicle burglary cases.

7. **GUILLERMO RAVELO** agreed to write and sign five arrest affidavits with false narratives to unlawfully charge E.B. with five unsolved vehicle burglary cases.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish its objectives, the following overt acts, among others, were committed, and caused to be committed, in the Southern District of Florida:

1. On or about January 23, 2013, R.A. told **GUILLERMO RAVELO** that he wanted him to unlawfully arrest C.D. for unsolved residential burglaries despite knowing that there was no evidence that C.D. had committed the burglaries.

2. On or about January 23, 2013, **GUILLERMO RAVELO** signed arrest affidavits charging C.D. with residential burglaries committed at the following locations in Miami-Dade County: A) January 12, 2013, at 11002 N.E. 4 Avenue; and B) January 12, 2013, at 1102 N.E. 116 Street.

3. On or about January 23, 2013, for each of the two residential burglaries, in compliance with R.A.'s order, **GUILLERMO RAVELO**, as the arresting officer, signed an arrest affidavit attesting that the contents were true and correct knowing the affidavit contained the false statement that C.D. had confessed to committing the burglary.

4. On or about July 9, 2013, at a meeting of the City Council for the Village of Biscayne Park, R.A. stated that the BPPD had a 100% clearance rate for burglaries.

5. On or about February 26, 2014, R.A. told **GUILLERMO RAVELO** that he wanted him to unlawfully arrest E.B. for five unsolved vehicle burglaries despite knowing that there was no evidence that E.B. had committed the vehicle burglaries.

6. On or about February 26, 2014, R.A. provided **GUILLERMO RAVELO** information for the five unsolved vehicle burglary cases knowing there was no evidence and no lawful basis to arrest and charge E.B. with the five unsolved vehicle burglaries.

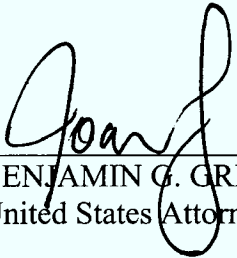
7. On or about February 26, 2014, **GUILLERMO RAVELO** completed arrest affidavits charging E.B. with vehicle burglaries committed at the following locations in Miami-Dade County: A) February 7, 2014 through February 8, 2014, at 12040 N.E. 8 Avenue; B) February 7, 2014 through February 8, 2014, at 12035 N.E. 5 Avenue; C) February 7, 2014 through February 8, 2014, at 1130 N.E. 5 Avenue; D) February 7, 2014 through February 8, 2014, at 11930 N.E. 5 Avenue; and E) February 7, 2014 through February 8, 2014, at 511 N.E. 119 Street.

8. On or about February 26, 2014, for each of the five vehicle burglaries, in compliance with R.A.'s order, **GUILLERMO RAVELO** falsely claimed in an arrest affidavit that E.B. had taken him to the site of the respective burglary and confessed to the items that E.B. had stolen.


9. On or about February 26, 2014, for each of the five vehicle burglaries, in compliance with R.A.'s order, **GUILLERMO RAVELO**, as the arresting officer, signed an arrest affidavit attesting that the contents were true and correct knowing the affidavit contained

the false statement that E.B. had taken him to the site of the respective burglary and confessed to the items that E.B. had stolen.

All in violation of Title 18, United States Code, Section 241.


BENJAMIN G. GREENBERG
United States Attorney

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Assistant United States Attorney


D.W. TUNNAGE
Trial Attorney
Civil Rights Division

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO. 18-CR-20255-MOORE

v.

CERTIFICATE OF TRIAL ATTORNEY*

GUILLERMO RAVELO

Defendant. /

Superseding Case Information:

Court Division: (Select One)

- Miami
- FTL
- Key West
- WPB
- FTP

New Defendant(s)

Yes No

Number of New Defendants _____

Total number of counts _____

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 0 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
- II 6 to 10 days
- III 11 to 20 days
- IV 21 to 60 days
- V 61 days and over

-
-
-
-
-

- Petty
- Minor
- Misdem.
- Felony

-
-
-
-

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) No

(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

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

Harry C. Wallace, Jr.

Harry C. Wallace, Jr.

ASSISTANT UNITED STATES ATTORNEY

Court I.D. No. A5501182

*Penalty Sheet(s) attached

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: GUILLERMO RAVELO

Case No: 18-CR-20255-MOORE

Count #: 1

Deprivation of Rights Under Color of Law

Title 18, United States Code, Section 242

***Max. Penalty:** 1 Year Imprisonment

Count #: 2

Conspiracy Against Rights

Title 18, United States Code, Section 241

***Max. Penalty:** 10 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.**