

IN CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

The UNITED MEXICAN STATES, as represented
by the FINANCIAL INTELLIGENCE UNIT of the
MEXICAN MINISTRY OF FINANCE AND
PUBLIC CREDIT, and the agencies and entities it
has the power to represent,

Plaintiff,

v.

GENARO GARCIA LUNA,
LINDA CRISTINA PEREYRA DE GARCIA,
MAURICIO SAMUEL WEINBERG LOPEZ,
JONATHAN ALEXIS WEINBERG PINTO,
SYLVIA DONNA PINTO DE WEINBERG,
NATAN WANCIER TAUB,

CASE NO:

Complex Business Litigation
Division

2. Plaintiff is seeking to recover at least USD \$250,000,000 stolen from the government of MEXICO by its former *Secretario de Seguridad Pública* [Minister of Public Security] GENARO GARCIA LUNA ("GARCIA LUNA") and his coconspirators who concealed the funds stolen from the government of MEXICO and the proceeds thereof and hindered the recovery thereof by laundering the proceeds through the transfer of the stolen funds out of Mexico to bank accounts in Barbados, the United States, and elsewhere. GARCIA LUNA and his coconspirators committed these acts at least in part while in Miami-Dade County, Florida.

3. As described herein, GARCIA LUNA and his coconspirators then used these stolen funds to acquire, control, and/or maintain a large and sophisticated money-laundering Enterprise, principally through the purchase and maintenance of personal and real property located in Florida and elsewhere. Significant amounts of the real property acquired in the money-laundering scheme are located in Miami-Dade County, Florida.