

FILED by **MM** D.C.  
**Nov 17, 2022**  
ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S.D. OF FLA. - MIAMI

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
22-20563-CR-SEITZ/REID**  
Case No. \_\_\_\_\_

18 U.S.C. § 1957  
18 U.S.C. § 982(a)(1)

**UNITED STATES OF AMERICA**

vs.

**CHRISTIAN JOSE GONZALEZ,**

**Defendant.**

\_\_\_\_\_ /

**INDICTMENT**

The Grand Jury charges that:

**GENERAL ALLEGATIONS**

At all times relevant to this Indictment:

**Relevant Terms**

1. A “merchant cash advance,” also called an “MCA,” is a form of alternative financing that provides a business fast access to funds based on their previous income or sales. An MCA company typically provides the client business, referred to as a “merchant,” upfront financing in exchange for a portion of the merchant’s future receivables at a discount or fixed periodic payments taken directly from the merchant’s bank account. MCA financing is typically used by small and medium-sized businesses in need of short-term financing. Although MCA financing is often more expensive than traditional small business loans, it is often faster and easier to obtain.

2. A “Ponzi” or “Ponzi scheme” is an investment fraud scheme that involves the payment of claimed returns to existing investors from funds contributed by new investors. *Ponzi*

scheme organizers often solicit new investors by promising to invest funds in opportunities claimed to generate high returns with little or no risk. In many *Ponzi* schemes, the participants focus on attracting new investments to make promised payments to earlier-stage investors to create the false appearance that investors are profiting from a legitimate business. *Ponzi* schemes require a consistent flow of new investor funds to continue and tend to collapse when it becomes difficult to obtain sufficient new investor funds or when a large number of investors ask for their investment principal back.

### **The Defendant and the Relevant Entities and Individuals**

3. United Capital Solutions LLC (“United Capital Solutions”) was a Florida limited liability company with its listed place of business in Coral Gables, Florida. Defendant **CHRISTIAN JOSE GONZALEZ** founded United Capital Solutions in or around August 2016 and was its sole member.

4. MJ Capital Funding, LLC (“MJ Capital”) was a Florida limited liability company with its listed place of business in Pompano Beach, Florida. MJ Capital was purportedly in the MCA lending business. Individual 1 founded MJ Capital in or around June 2020.

5. Pavel Ruiz MJCF LLC (“Pavel Ruiz MJCF”) was a Florida limited liability company with its listed place of business in Plantation, Florida. Pavel Ramon Ruiz Hernandez, a/k/a “Pavel Ruiz,” founded Pavel Ruiz MJCF in or around March 2021 and was its sole member.

6. MJCF, LLC (“MJCF”) was a Florida limited liability company with its listed place of business in Pompano Beach, Florida. Defendant **CHRISTIAN JOSE GONZALEZ** founded MJCF in or around April 2021. **GONZALEZ** and Individual 1 were members of MJCF.

7. Individual 1, a resident of Broward County, Florida, was an authorized member, and the President and Chief Executive Officer (“CEO”) of MJ Capital. Individual 1 exercised

ultimate control over the operations of MJ Capital and maintained significant involvement in the company's daily operations.

8. Pavel Ramon Ruiz Hernandez, a resident of Broward County, Florida, helped Individual 1 manage the operations of MJ Capital.

9. Defendant **CHRISTIAN JOSE GONZALEZ**, a resident of Broward County, Florida, did business through United Capital Solutions and did work as a consultant for MJ Capital.

**COUNTS 1-2**  
**Money Laundering**  
**(18 U.S.C. § 1957)**

1. The General Allegations section of this Indictment is realleged and fully incorporated herein by reference.

2. On or about the dates specified as to each count below, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

**CHRISTIAN JOSE GONZALEZ,**

did knowingly engage in, and attempt to engage in, a monetary transaction affecting interstate commerce, by, through, and to a financial institution, in criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity, and knowing that the property involved in the monetary transaction represented the proceeds of some form of unlawful activity, as more particularly described in each Count below:

<b>Count</b>	<b>Approximate Date</b>	<b>Monetary Transaction</b>
1	12/14/2021	Withdrawal in the approximate amount of \$159,936 from MJCF's JP Morgan Chase Bank account ending in 6678.
2	12/14/2021	Deposit in the approximate amount of \$155,000 into United Capital Solutions' JP Morgan Chase Bank account ending in 7833.

It is further alleged that the specified unlawful activity was wire fraud, in violation of Title 18, United States Code, Section 1343.

In violation of Title 18, United States Code, Section 1957.

**FORFEITURE ALLEGATIONS**

1. The allegations of this Indictment are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendant, **CHRISTIAN JOSE GONZALEZ**, has an interest.

2. Upon conviction of a violation of Title 18, United States Code, Section 1957, as alleged in this Indictment; the defendant shall forfeit to the United States any property, real or personal, involved in such offense, and any property traceable to such property, pursuant to Title 18, United States Code, Section 982(a)(1).

3. If any of the property subject to forfeiture, 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 divided without difficulty,

the United States shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p).

All pursuant to Title 18, United States Code, Section 982(a)(1), and the procedures set forth in Title 21, United States Code, Section 853, as incorporated by Title 18, United States Code, Section 982(b)(1).

A TRUE BILL

FOREPERSON

  
\_\_\_\_\_  
JUAN ANTONIO GONZALEZ  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
ERIC E. MORALES  
ASSISTANT U.S. ATTORNEY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO.:

v.

CHRISTIAN JOSE GONZALEZ,

CERTIFICATE OF TRIAL ATTORNEY\*

\_\_\_\_\_/

Defendant.

Court Division (select one)


- Miami
- Key West
- FTP
- FTL
- WPB

Superseding Case Information:

- New Defendant(s) (Yes or No)
- Number of New Defendants
- Total number of New 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. §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  Petty  
 II  6 to 10 days  Minor  
 III  11 to 20 days  Misdemeanor  
 IV  21 to 60 days  Felony  
 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. \_\_\_\_\_
7. Has a complaint been filed in this matter? (Yes or No) No  
If yes, Magistrate Case No. \_\_\_\_\_
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) Yes  
If yes, Judge Smith Case No. 22-20400-CR-Smith
9. Defendant(s) in federal custody as of \_\_\_\_\_
10. Defendant(s) in state custody as of \_\_\_\_\_
11. Rule 20 from the \_\_\_\_\_ District of \_\_\_\_\_
12. Is this a potential death penalty case? (Yes or No) No
13. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard? (Yes or No) No
14. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss? (Yes or No) No

By:   
 Eric E. Morales  
 Assistant United States Attorney  
 FLA Bar No. 1010791

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: CHRISTIAN JOSE GONZALEZ

Case No: \_\_\_\_\_

Counts #: 1-2

Title 18, United States Code, Section 1957

Money Laundering

\* **Max. Term of Imprisonment:** 10 years

\* **Mandatory Min. Term of Imprisonment (if applicable):** N/A

\* **Max. Supervised Release:** 3 years

\* **Max. Fine:** \$250,000 fine or twice the value of the criminally derived property

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