

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 23-CR-20123-MOORE

UNITED STATES OF AMERICA

v.

GUILHERME CIPRIANI,

Defendant.

FACTUAL PROFFER

The United States of America and the Defendant, **GUILHERME CIPRIANI** (“**CIPRIANI**”), agree that, had this case gone to trial, the United States would have proven the following facts beyond a reasonable doubt:

On November 10, 2022, **CIPRIANI** arrived at Miami International Airport aboard American Airlines flight 906 from Sao Paulo, Brazil. Upon arrival, **CIPRIANI** was given a Customs and Border Protection (“**CBP**”) Form 6059B to fill out by a **CBP** officer. **CIPRIANI** did not declare any commercial merchandise or monetary instruments on the Form 6059B.

CBP officials selected **CIPRIANI** for random questioning. **CBP** questioned **CIPRIANI** and asked if he was truthful on his Form 6059B. **CIPRIANI** said he was being truthful. **CBP** also asked **CIPRIANI** if his carry-on bag and the belongings inside it were his. **CIPRIANI** confirmed that the bag and the belongings inside it were his. **CBP** subsequently searched **CIPRIANI**’s carry-on bag and found fourteen cut diamonds and 53 uncut diamonds hidden in an orange cosmetic bag. None of the diamonds were certified by the Kimberly Process Certification Scheme nor did **CIPRIANI** declare them on his Form 6059B.

CBP agents read **CIPRIANI** his *Miranda* rights and **CIPRIANI** agreed to be interviewed.

During the interview, CIPRIANI admitted that he purchased the diamonds from Brazil, knew he was bringing diamonds into the United States and needed to declare them, and that he was going to sell the diamonds in the United States for a profit. Text messages from CIPRIANI's phone confirmed this plan.

The information contained in this proffer is not a complete recitation of the facts and circumstances of this case, but the parties agree it is sufficient to prove beyond a reasonable doubt that CIPRIANI smuggled goods into the United States, in violation of Title 18, United States Code, Section 545.

DATE: 8/2/2023

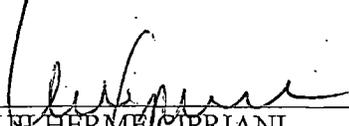
MARKENZY LAPOINTE
UNITED STATES ATTORNEY

BY: _____
STEFAN DIAZ ESPINOSA
ASSISTANT UNITED STATES ATTORNEY

DATE: 8/2/23


BY: _____
FRANK QUINTERO
COUNSEL FOR THE DEFENDANT

DATE: 8/2/23


BY: _____
GUYLHERME CIPRIANI
DEFENDANT