

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
26-CR-20128-BECERRA/TORRES
CASE NO. _____

18 U.S.C. § 1015(f)

18 U.S.C. § 611

UNITED STATES OF AMERICA

v.

WILNER RENAUD,

Defendant.



INDICTMENT

The Grand Jury charges that:

COUNT 1

False Claim of Citizenship in Order to Vote
(18 U.S.C. § 1015(f))

On or about June 27, 2022, in Miami-Dade County, in the Southern District of Florida, the defendant,

WILNER RENAUD,

an alien, knowingly made a false statement and claim that he was a citizen of the United States, in order to register to vote and to vote in a Federal, State, and local election, in that he falsely stated and claimed that he was a United States citizen when registering to vote with the office of the supervisor of elections for Miami-Dade County, Florida, in violation of Title 18, United States Code, Section 1015(f).

COUNT 2

**False Claim of Citizenship in Order to Vote
(18 U.S.C. § 1015(f))**

On or about June 4, 2024, in Miami-Dade County, in the Southern District of Florida, the defendant,

WILNER RENAUD,

an alien, knowingly made a false statement and claim that he was a citizen of the United States, in order to register to vote and to vote in a Federal, State, and local election, in that he falsely stated and claimed that he was a United States citizen when registering to vote with the office of the supervisor of elections for Miami-Dade County, Florida, in violation of Title 18, United States Code, Section 1015(f).

COUNT 3

**False Claim of Citizenship in Order to Vote
(18 U.S.C. § 1015(f))**

On or about June 7, 2024, in Miami-Dade County, in the Southern District of Florida, the defendant,

WILNER RENAUD,

an alien, knowingly made a false statement and claim that he was a citizen of the United States, in order to register to vote and to vote in a Federal, State, and local election, in that he falsely stated and claimed that he was a United States citizen when registering to vote with the office of the supervisor of elections for Miami-Dade County, Florida, in violation of Title 18, United States Code, Section 1015(f).

COUNT 4

**False Claim of Citizenship in Order to Vote
(18 U.S.C. § 1015(f))**

On or about September 22, 2025, in Miami-Dade County, in the Southern District of Florida, the defendant,

WILNER RENAUD,

an alien, knowingly made a false statement and claim that he was a citizen of the United States, in order to register to vote and to vote in a Federal, State, and local election, in that he falsely stated and claimed that he was a United States citizen when registering to vote with the office of the supervisor of elections for Miami-Dade County, Florida, in violation of Title 18, United States Code, Section 1015(f).

COUNT 5

**Voting By Alien
(18 U.S.C. § 611)**

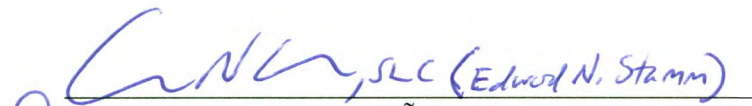
On or about November 8, 2022, in Miami-Dade County, in the Southern District of Florida, the defendant,

WILNER RENAUD,

an alien, fully knowing that he was not a United States citizen, did knowingly vote in an election held in part for the purpose of electing a candidate for United States Senator, and Member of the House of Representatives, in violation of Title 18, United States Code, Section 611.

TRUE BILL


FOREPERSON


JASON A. REDING QUIÑONES
UNITED STATES ATTORNEY


JEFFREY M. PIERCE
SPECIAL ASSISTANT UNITED STATES ATTORNEY

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

UNITED STATES OF AMERICA

CASE NO.: 26-CR-20128-BECERRA/TORRES

v.

WILNER RENAUD,

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, 28 U.S.C. §3161.
3. Interpreter: (Yes or No) No
List language and/or dialect: _____
4. This case will take 2 days for the parties to try.
5. Please check appropriate category and type of offense listed below:

(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	(Check only one) ☐ Petty ☐ Minor ☐ Misdemeanor ☒ Felony
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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, Judge _____ Magistrate Case No. _____
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) No
If yes, Judge _____ Case No. _____
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 Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? (Yes or No) No
14. Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No
15. Did this matter involve the participation of or consultation with Magistrate Judge Marty Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No
16. Did this matter involve the participation of or consultation with Magistrate Judge Ellen F. D'Angelo during her tenure at the U.S. Attorney's Office, which concluded on October 7, 2024? No

By: _____

JEFFREY M. PIERCE

Special Assistant United States Attorney

FL Bar No.

1002549

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

PENALTY SHEET

Defendant's Name: WILNER RENAUD

Case No: _____

Counts 1, 2, 3, 4:

False Claim of Citizenship in Order to Vote

Title 18, United States Code, Section 1015(f)

- * **Max. Term of Imprisonment: Five (5) years**
- * **Mandatory Min. Term of Imprisonment (if applicable): N/A**
- * **Max. Supervised Release: Three (3) Years**
- * **Max. Fine: \$250,000**

Count 5:

Voting by Alien

Title 18, United States Code, Section 611

- * **Max. Term of Imprisonment: One (1) year**
- * **Mandatory Min. Term of Imprisonment (if applicable): N/A**
- * **Max. Supervised Release: One (1) year**
- * **Max. Fine: \$100,000**

***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.**