

provide training to each of their agents on the money laundering laws and currency reporting requirements. These companies provide manuals and updates to all of their agents specifically advising agents as to the laws regarding illegal money laundering, the sanctions for illegal money laundering, and the requirements for reporting suspicious transactions.

4. Defendant ANA MILAGROS MOLINA received training manuals and other documentation and information from Western Union, Girosol Corporation, Moneygram and Remesas Costamar regarding the reporting requirements and the possible criminal penalties associated with violating the anti-money laundering and currency transaction reporting requirements of the Bank Secrecy Act. Defendant MOLINA retained these training manuals and other documents and information on the premises of AMIS.

5. Defendant ANA MILAGROS MOLINA conducted international financial transactions involving approximately \$400,000 of proceeds from illegal drug trafficking, in violation of Title 21, United States Code, Section 841. Specifically, with regard to these funds, defendant MOLINA arranged for international transfers of money to Colombia and the Dominican Republic. Defendant MOLINA knowingly transported, transmitted, and transferred funds that were the proceeds of unlawful activity to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity and structured the transactions to evade and defeat the currency transaction reporting requirements and permitted the use of false identification and fictitious names to prevent discovery of the sender's true identity and to evade the reporting requirements.

6. On or about the dates set forth below, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ANA MILAGROS MOLINA

knowingly conducted, attempted to conduct, and aided and abetted the conducting of, the following international financial transactions affecting interstate and foreign commerce:

COUNT	DATE	AMOUNT LAUNDERED	COUNTRY OF ORIGIN	DESTINATION COUNTRY
ONE	11/6/01	\$4,000	United States	Dominican Republic
TWO	3/27/02	\$2,720	United States	Colombia
THREE	5/1/02	\$2,757	United States	Colombia
FOUR	10/7/02	\$2,000	United States	Dominican Republic
FIVE	2/18/03	\$3,000	United States	Dominican Republic
SIX	2/19/03	\$5,000	United States	Dominican Republic

7. When conducting the international financial transactions described in paragraph six above, defendant ANA MILAGROS MOLINA knowingly transported, transmitted, and transferred, attempted to transport, transmit, and transfer, and aided and abetted the transport, transmission, and transfer of, monetary instruments and funds from a place in the United States to a place outside the United States knowing that the funds transported, transmitted, and transferred represented the proceeds of some form of unlawful activity and knowing that the transportation, transmission, and transfer in whole and in part was designed to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, and to avoid a transaction reporting requirement under state or federal law.

All in violation of Title 18, United States Code, Sections 1956(a)(2)(B)(i) and (ii)

and 2.

PATRICK L. MEEHAN
UNITED STATES ATTORNEY