

FILED

MAY 25 2022

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

RUEBEN SCHWARTZ,

Defendant.

) INDICTMENT

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CASE NO. **1 : 22 CR 281**

Title 18, United States Code,
Section 1956(h)

JUDGE NUGENT

MAG. JUDGE HENDERSON

COUNT 1

(Conspiracy to Launder Monetary Instruments, 18 U.S.C. § 1956(h))

The Grand Jury charges:

1. From on or about October 21, 2019 until on or about May 19, 2022, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant RUEBEN SCHWARTZ did knowingly combine, conspire, and agree with M.M. (an individual known to the grand jury but not indicted herein) and other persons known and unknown to the Grand Jury, to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit: knowingly conduct and attempt to conduct financial transactions affecting interstate commerce, that is, cash purchases of properties in and around Conneaut, Ohio, which transactions involved the proceeds of a specified unlawful activity, that is distribution of controlled substances, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the

proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

All in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE

The Grand Jury further charges:

2. The allegations contained in Count 1 are hereby re-alleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 982(a)(1). As a result of this offense, defendant RUEBEN SCHWARTZ shall forfeit to the United States all property, real and personal, involved in such offense, and all property traceable to such property; including, but not limited to, the following:

a.) \$15,000.00 U.S. Currency seized on February 22, 2022, at a location in Conneaut, Ohio.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.