

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Crim. No. 11-
	:	
	:	
v.	:	18 U.S.C. § 1956(h)
	:	18 U.S.C. § 982(a)(1)
	:	
	:	
LEVI DEUTSCH, a/k/a "Levi Deutch," a/k/a "Levi Deutse"	:	<u>I N F O R M A T I O N</u>

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

1. At all times relevant to this Information:

a. Defendant LEVI DEUTSCH, a/k/a "Levi Deutch," a/k/a "Levi Deutse," (hereinafter, "defendant DEUTSCH") resided in Israel.

b. Mordchai Fish, a/k/a "Mordechai Fisch" (hereinafter, "Fish"), resided in Brooklyn, New York, and was the principal rabbi of a synagogue located in Brooklyn. Through his position as a rabbi, Fish operated or was affiliated with several purportedly charitable organizations, including Boyoner Gemilas Chesed.

c. Binyomin Spira, a/k/a "Benjamin Spira" (hereinafter, "Binyomin Spira"), resided in Brooklyn and was employed at a bakery in the Flatbush section of Brooklyn (hereinafter, "the

Bakery").

d. There was a cooperating witness (hereinafter, the "CW") who had been charged in a federal criminal complaint with bank fraud in or about May 2006. At the direction, and with the approval of, the Federal Bureau of Investigation ("FBI"), the CW represented to defendant DEUTSCH as well as to Fish and Spira that the CW sought to conceal and launder illicit funds through an already-established underground money transfer network to which defendant DEUTSCH, Fish and Spira had access. The CW also repeatedly represented to defendant DEUTSCH and Fish that the funds that the CW sought to conceal and launder were proceeds from the CW's illegal schemes and businesses, including the trafficking of counterfeit goods.

3. From in or about March 2009 to in or about July 2009, in Monmouth County, in the District of New Jersey and elsewhere, defendant

LEVI DEUTSCH,
a/k/a "Levi Deutch,"
a/k/a "Levi Deutse,"

knowingly and with intent to conceal and disguise the nature, location, source, ownership, and control of property believed to be the proceeds of a specified unlawful activity -- that is, trafficking of counterfeit goods, contrary to Title 18, United States Code, Section 2320 -- conspired and agreed with Mordchai Fish, Binyomin Spira and others to conduct financial transactions

affecting interstate commerce, involving property represented by the CW at the direction, and with the approval, of a federal official authorized to investigate and prosecute violations of Title 18, United States Code, Section 1956, to be the proceeds of a specified unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(3).

4. It was the object of the conspiracy for defendant DEUTSCH and others to obtain fees for laundering the CW's checks through bank accounts held in the names of Boyoner Gemilas Chesed and various individuals and returning cash to the CW through an international, underground money transfer network.

5. It was part of the conspiracy that:

a. Defendant DEUTSCH agreed to conceal and launder the CW's funds through the international, underground money transfer network.

b. Defendant DEUTSCH agreed to accept checks from the CW drawn upon an account based in Monmouth County, New Jersey and convert those checks into cash.

c. Defendant DEUTSCH or Fish directed the CW to make the checks payable to Boyoner Gemilas Chesed or specified individuals that were to be used as fronts or conduits for concealing and laundering the CW's money.

d. Defendant DEUTSCH agreed to accept and accepted checks from the CW that were represented by the CW to be the proceeds of

the specified unlawful activity.

e. Defendant DEUTSCH then caused to be deposited the CW's checks into banks accounts held in the names of Boyoner Gemilas Chesed or other individuals at various financial institutions.

f. The CW, at the direction of defendant DEUTSCH or Fish, retrieved the cash along with either defendant DEUTSCH, Fish or both, from individuals at certain locations, including from Binyomin Spira at the Bakery. These meetings with defendant DEUTSCH, Fish and Spira were coordinated by the CW placing telephone calls from New Jersey to defendant DEUTSCH or Fish at locations in New York and Israel.

g. Defendant DEUTSCH caused the CW to be provided with the cash due the CW in the amounts of the checks that had been provided by the CW, less a fee to be retained by defendant DEUTSCH and Fish.

h. Defendant DEUTSCH took measures to ensure that the money laundering transactions that he conducted for the CW went undetected by suggesting that he and the CW use code language when discussing money laundering transactions during telephone conversations.

i. Between in or about March 2009 and in or about July 2009, on the following dates, defendant DEUTSCH engaged in the following money laundering transactions with the CW and others:

<u>DATE</u>	<u>LOCATION</u>	<u>APPROXIMATE AMOUNT OF TRANSACTION</u>
May 7, 2009	The Bakery	\$100,000
May 14, 2009	The Bakery	\$100,000

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

FORFEITURE ALLEGATION

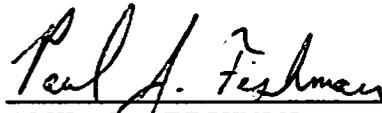
(18 U.S.C. § 982)

As the result of committing the aforementioned offense in violation of Title 18, United States Code, Section 1956(h), as alleged in this Information, defendant DEUTSCH shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), all property, real and personal, that was involved in such offense or traceable to such property, in the amount of \$25,000.

If any of the above-described forfeitable property, as a result of any act or omission of defendant DEUTSCH:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 18 U.S.C. § 982(b), to seek forfeiture of any other property of defendant DEUTSCH up to the value of the above forfeitable property.



PAUL J. FISHMAN
UNITED STATES ATTORNEY

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INFORMATION

**18 U.S.C. § 1956(a)(3)
18 U.S.C. § 1956(h)**

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