

FJN:PP/AA  
F. #2023R00676

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

- against -

ALAIN TZVI BIBLIOWICZ  
MITRANI,  
also known as "Alain  
Bibliowicz,"

Defendant.

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THE GRAND JURY CHARGES:

### INTRODUCTION

At all times relevant to this Indictment, unless otherwise indicated:

I. The Defendant

1. The defendant ALAIN TZVI BIBLIOWICZ MITRANI, also known as "Alain Bibliowicz," was a citizen of France and Colombia and a resident of Miami, Florida.

II. The Money Laundering Scheme

2. From approximately 2020 to 2024, the defendant ALAIN TZVI BIBLIOWICZ MITRANI was a co-owner of Company-1, the identity of which is known to the Grand Jury. Company-1's purported purpose was the creation of digital tools that allowed for the international transfer of money. In fact, Company-1's primary purpose was the laundering of the proceeds of illegal activity, including narcotics trafficking, through the United States, Colombia and other countries.

FILED  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.  
\* JANUARY 30, 2025 \*  
BROOKLYN OFFICE

### I N D I C T M E N T

Cr. No. 25-CR-39  
(T. 18, U.S.C., §§ 371, 982(a)(1),  
982(b)(1), 1956(h) and 3551 et seq.;  
T. 21, U.S.C., § 853(p))

Judge Brian M. Cogan  
Magistrate Judge Robert M. Levy

3. As part of the scheme, the defendant ALAIN TZVI BIBLIOWICZ MITRANI, together with others, laundered approximately \$300 million dollars through Company-1 and its affiliates by means of rapid wire transfers, cryptocurrency exchanges and fraudulent shell companies. BIBLIOWICZ MITRANI laundered these funds despite knowing that they represented the proceeds of criminal activity including narcotics trafficking.

4. The Bank Secrecy Act, as amended and codified at Title 31, United States Code, Sections 5313 through 5326, was a set of laws and regulations enacted by Congress to address an increase in criminal money laundering through financial institutions. Title 31, United States Code, Section 5330(a), and the regulations promulgated under it, required individuals who owned or controlled a money transmitting business to register with the U.S. government. To obscure the source of the proceeds and protect the scheme, Company-1, BIBLIOWICZ MITRANI and others failed to register as money remitters.

COUNT ONE  
(Money Laundering Conspiracy)

5. The allegations contained in paragraphs one through four are realleged and incorporated as if fully set forth in this paragraph.

6. In or about and between July 2020 and May 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ALAIN TZVI BIBLIOWICZ MITRANI, also known as “Alain Bibliowicz,” together with others, did knowingly and intentionally conspire to conduct one or more financial transactions in and affecting interstate and foreign commerce, including deposits, transfers and withdrawals of funds and monetary instruments, which in fact involved the proceeds of specified unlawful activity, to wit: narcotics trafficking, in violation of Title 21, United States Code, Sections 841(a)(1), 846 and 959, knowing that the property involved in the financial transactions

represented the proceeds of some form of unlawful activity, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of the specified unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(B)(i).

(Title 18, United States Code, Sections 1956(h) and 3551 et seq.)

COUNT TWO  
(Money Laundering Conspiracy)

7. The allegations contained in paragraphs one through four are realleged and incorporated as if fully set forth in this paragraph.

8. In or about and between July 2020 and May 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ALAIN TZVI BIBLIOWICZ MITRANI, also known as “Alain Bibliowicz,” together with others, did knowingly and intentionally conspire to engage in one or more financial transactions, to wit: deposits, withdrawals and transfers of funds and monetary instruments, in and affecting interstate and foreign commerce, by, through and to one or more financial institutions, in criminally derived property that was of a value greater than \$10,000 and that was derived from specified unlawful activity, to wit: narcotics trafficking, in violation of Title 21, United States Code, Sections 841(a)(1), 846 and 959, contrary to Title 18, United States Code, Section 1957(a).

(Title 18, United States Code, Sections 1956(h) and 3551 et seq.)

COUNT THREE  
(Conspiracy to Operate an Unlicensed Money Transmitting Business)

9. The allegations contained in paragraphs one through four are realleged and incorporated as if fully set forth in this paragraph.

10. In or about and between July 2020 and May 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ALAIN TZVI BIBLIOWICZ MITRANI, also known as “Alain Bibliowicz,” together with others, did knowingly and willfully conspire to conduct, control, manage, supervise, direct and own all or part of an unlicensed money transmitting business which affected interstate and foreign commerce, to wit: Company-1 and its affiliates, which (a) operated without an appropriate money transmitting license in the State of Florida, where such operation is punishable as a felony under Florida law; (b) failed to comply with the money transmitting business registration requirements under Title 31, United States Code, Section 5330 and the regulations prescribed thereunder; and (c) involved the transportation and transmission of funds known to the defendant to have been derived from a criminal offense and intended to be used to promote and support unlawful activity, contrary to Title 18, United States Code, Section 1960.

11. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendant ALAIN TZVI BIBLIOWICZ MITRANI, also known as “Alain Bibliowicz,” did commit and cause the commission of, among others, the following:

OVERT ACTS

(a) On or about December 9, 2021, BIBLIOWICZ MITRANI, together with others, established Shell Company-A, the identity of which is known to the Grand Jury, as a Florida limited liability corporation.

(b) On or about January 15, 2021, BIBLIOWICZ MITRANI, together with others, established Shell Company-B, the identity of which is known to the Grand Jury, as a Florida limited liability corporation.

(c) On or about November 15, 2022, BIBLIOWICZ MITRANI caused the transfer of \$235,000 from a bank account in the name of Shell Company-B, the identity of which is known to the Grand Jury, to another bank account he controlled.

(d) On or about November 4, 2023, BIBLIOWICZ MITRANI sent a message via an encrypted application to co-conspirators, individuals whose identities are known to the Grand Jury.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

#### CRIMINAL FORFEITURE ALLEGATION

12. The United States hereby gives notice to the defendant that, upon his conviction of any of the offenses charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(1), which requires any person convicted of such offenses to forfeit any property, real or personal, involved in such offenses, or any property traceable to such property, including, but not limited to, the real property and premises located at 18850 NE 22nd Ave, Miami, Florida 33180, together with its appurtenances, improvements, fixtures, easements, furnishings and attachments thereon, as well as all leases, rents and profits therefrom, and all proceeds traceable thereto.

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

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;

- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 982(a)(1) and 982(b)(1); Title 21, United States Code, Section 853(p))

A TRUE BILL

  
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FOREPERSON

*By Carolyn Pokorny, Assistant U.S. Attorney*  
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JOHN J. DURHAM  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK