

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon.
	:	
	:	Crim. No.
v.	:	
	:	
	:	18 U.S.C. §§ 1960(a) and (b)
ISABELLA VALDERRAMA OSPINA	:	18 U.S.C. § 2

I N F O R M A T I O N

(Operating an Unlicensed Money Transmitting Business)

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

From in or around August 2024, through in or around July 2025, in the District of New Jersey, and elsewhere, the defendant,

ISABELLA VALDERRAMA OSPINA,

knowingly conducted, controlled, managed, supervised, directed, and owned all or part of an unlicensed money transmitting business, and aided and abetted the conduct, control, management, supervision, direction, and ownership of such a money transmitting business, which performed business affecting interstate and foreign commerce, and was a business (i) operating without an appropriate money transmitting license in a state where such operation is punishable as a misdemeanor or a felony under state law, that is, the State of New Jersey, and (ii) required to register with the Financial Crimes Enforcement Network (“FinCEN”), an agency of

the United States government, pursuant to Title 31, United States Code, Section 5330.

In violation of Title 18, United State Code, Sections 1960(a), (b)(1)(A) and (b)(1)(B) and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

Upon conviction of the offense alleged in this Information, the defendant, ISABELLA VALDERRAMA OSPINA, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in such offense, and all property traceable to such property.

SUBSTITUTE ASSETS PROVISION

If any of the property described above, 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,

the United States shall be entitled, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), to forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

TODD BLANCHE
U.S. Deputy Attorney General

PHILIP LAMPARELLO
Senior Counsel

/s/ Robert L. Toll
Assistant U.S. Attorney

Approved:



Bradley A. Harsch
Chief, Criminal Division