

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

FELICIA ALMONTE,
ERICKSON CHECO-ALMONTE,
JULIO DE LA CRUZ-ACOSTA,
WILLY CRUZ-BONILLA,
JORDANO ABREU-DIAZ, and
ENMANUEL NUNEZ-REYES

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: **FILED UNDER SEAL**
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: Mag. No. 19-3497
:

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: **CRIMINAL COMPLAINT**
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I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

SEE ATTACHMENT A

I further state that this Complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.



Special Agent Leeanna E. Canuelas,
U.S. Drug Enforcement Administration

Sworn to before me and signed in my presence.

Date: November 12, 2019

City and State: Newark, New Jersey



HON. JAMES B. CLARK, III
United States Magistrate Judge

ATTACHMENT A

COUNT ONE

(Conspiracy to Commit Money Laundering)

From in or around July 2016 through in or around January 2019, in Passaic County, in the District of New Jersey, and elsewhere, the Defendants,

FELICIA ALMONTE,
ERICKSON CHECO-ALMONTE,
JULIO DE LA CRUZ-ACOSTA,
WILLY CRUZ-BONILLA,
JORDANO ABREU-DIAZ, and
ENMANUEL NUNEZ-REYES

did knowingly and intentionally conspire and agree with each other and other persons, known and unknown,

- (1) to conduct and attempt to conduct financial transactions in and affecting interstate and foreign commerce, which involved the proceeds of specified unlawful activity—that is, conspiracy to distribute and possess with intent to distribute a controlled substance—knowing that the transaction was 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 knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(B)(i); and
- (2) to knowingly engage and attempt to engage in a monetary transaction in criminally derived property of a value greater than \$10,000 and which is derived from specified unlawful activity—that is, conspiracy to distribute and possess with intent to distribute a controlled substance, contrary to Title 18, United States Code, Section 1957(a).

In violation of Title 18, United States Code, Sections 1956(h) and 2.

COUNT TWO

(Conducting an Unlicensed Money Transmitting Business)

From in or around July 2016 through in or around January 2019, the Defendants,

FELICIA ALMONTE,
ERICKSON CHECO-ALMONTE,
JULIO DE LA CRUZ-ACOSTA,
WILLY CRUZ-BONILLA,
JORDANO ABREU-DIAZ, and
ENMANUEL NUNEZ-REYES

knowingly conducted, controlled, managed, supervised, directed, and owned part and all 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 business affected interstate and foreign commerce, and: (a) was a business operated 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; (b) was a business required to register with the Financial Crimes Enforcement Network ("FinCEN"), an agency of the United States government, pursuant to Section 5330 of Title 31, United States Code; and (c) otherwise involved the transportation or transmission of funds that were known to the defendants to have been derived from a criminal offense and were intended to be used to promote or support unlawful activity.

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

ATTACHMENT B

I, Leeanna E. Canuelas, am a Special Agent with the United States Drug Enforcement Administration (“DEA”). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and items of evidence. Because this complaint is being submitted for the limited purpose of establishing probable cause, I have not set forth each and every fact that I know concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause. Unless specifically indicated, all dates, times, and transaction amounts referenced herein are approximate, and all conversations and statements described are related in substance and in part.

1. The DEA and the Internal Revenue Service-Criminal Investigation have been investigating a large-scale, international Money Laundering Organization (“MLO”) with networks of co-conspirators based in New Jersey, Florida, the Dominican Republic, and other locations. The investigation has revealed that the MLO facilitates the transfer of cash proceeds of illegal drug sales from the United States to drug trafficking organizations with ties to the Dominican Republic, Columbia, and elsewhere.

2. The MLO uses a number of methods to conceal the nature, source, ownership, and control of the illegal drug proceeds in order to avoid scrutiny by law enforcement and banking institutions. A common method used by the MLO to launder cash drug proceeds involves recruiting individuals, including but not limited to the Defendants, to take the cash to banks in which they hold accounts and purchase cashier’s checks made payable to companies and individuals as dictated by the MLO. Unlike a personal check, the funds for a cashier’s check are guaranteed by the bank, not by an individual account holder. As a result, the beneficiary of the check is guaranteed to have the funds available immediately without waiting for the check to “clear” the bank.

3. The Defendants were directed by a “money broker” (“CC-1”) who served as the conduit between the leaders of the MLO and coordinated money laundering activities on behalf of the MLO in New Jersey, New York, and Florida. Specifically, at the MLO’s direction, CC-1 arranged to pick up millions of dollars in cash drug proceeds in and around New Jersey, New York, and elsewhere. CC-1 then divided the cash into smaller amounts and distributed it to the Defendants with instructions to purchase cashier’s checks. CC-1 told the Defendants how many checks to purchase with the cash, the amount of each check, and the payee for each check.

4. The Defendants agreed to accept the cash and purchase the cashier’s checks in exchange for an agreed-upon fee per check. The Defendants were generally paid approximately \$150 to \$200 per check

purchased. CC-1 also told the Defendants that if they were asked by the banks about the source of the cash, they were to say that they worked at a liquor store and that the cash was related to that business.

5. Once the Defendants purchased the cashier's checks, they returned the checks to CC-1, who then deposited them directly into third-party accounts or sent them to the check beneficiaries or the MLO.

6. Converting cash into cashier's checks was a means used by the MLO, CC-1, and the Defendants to conceal the nature, source, ownership, and control of the illicit cash drug proceeds. That is because the cash used to purchase a cashier's check is generally not deposited into the Defendants' bank account. Hence, the transaction typically does not appear on the Defendants' bank statement. In rare situations where a particular bank did require a Defendant to deposit the cash into his or her account in order to purchase a cashier's check, the Defendants were told not to continue with the transaction and to use another bank account.

7. When permitted to do so by certain banks, the Defendants further attempted to conceal the nature, source, ownership, and control of the illicit funds by changing the name of the remitter (*i.e.*, the name of the person who paid for the cashier's check) to someone other than themselves.

8. At all times relevant to this Complaint, neither CC-1 nor any of the Defendants were registered as a money service business in New Jersey or with FinCEN.

9. Between in and around July 2016 through in or around January 2019, the Defendants, CC-1, and other co-conspirators converted over \$27,000,000 in U.S. currency into approximately 1,059 cashier's checks.

Felicia Almonte

10. Between on or about August 16, 2016 through on or about November 14, 2017, Defendant Felicia Almonte ("Almonte") converted approximately \$4,499,895.58 in U.S. currency into approximately 158 cashier's checks. Almonte provided a name other than hers to be listed as the remitter on at least 43 of the cashier's checks she purchased.

11. For example, on or about June 27, 2017, Almonte purchased four cashier's checks with U.S. currency totaling \$119,850.

12. On or about July 24, 2017, Almonte purchased four cashier's checks with U.S. currency totaling \$122,800.

13. On or about August 16, 2017, Almonte purchased five cashier's checks with U.S. currency totaling \$127,410.

Erickson Checo-Almonte

14. From on or about April 11, 2017 through on or about March 6, 2018, Defendant Erickson Checo-Almonte ("Checo-Almonte) converted approximately \$3,987,891.05 in U.S. currency into approximately 137 cashier's checks. Checo-Almonte provided a name other than his to be listed as the remitter on at least 28 of the cashier's checks he purchased.

15. For example, on or about July 26, 2017, Checo-Almonte purchased four cashier's checks with U.S. currency totaling \$86,344.

16. On or about August 12, 2017, Checo-Almonte purchased nine cashier's checks with U.S. currency totaling \$278,400.

17. On or about February 20, 2018, Checo-Almonte purchased four cashier's checks with U.S. currency totaling \$137,080.

Julio De La Cruz-Acosta

18. From on or about July 28, 2016 through on or about December 18, 2017, Defendant Julio De La Cruz-Acosta ("De La Cruz") converted approximately \$1,935,817.30 in U.S. currency into approximately 67 cashier's checks.

19. For example, on or about August 22, 2017, De La Cruz purchased three cashier's checks with U.S. currency totaling \$82,174.

20. On or about December 14, 2017, De La Cruz purchased five cashier's checks with U.S. currency totaling \$165,902.15.

Willy Cruz-Bonilla

21. From on or about August 24, 2016 through on or about August 28, 2017, Defendant Willy Cruz-Bonilla ("Cruz-Bonilla") converted approximately \$2,514,234.12 in U.S. currency into approximately 94 cashier's checks.

22. For example, on or about April 5, 2017, Cruz-Bonilla purchased four cashier's checks with U.S. currency totaling \$120,971.

23. On or about June 15, 2017, Cruz-Bonilla purchased three (3) cashier's checks with U.S. currency totaling \$58,000.

Jordano Abreu-Diaz

24. From on or about November 25, 2016 through on or about August 17, 2017, Defendant Jordano Abreu-Diaz (“Abreu-Diaz”) converted approximately \$1,082,250.35 in U.S. currency into approximately 39 cashier’s checks.

25. For example, on or about November 28, 2016, Abreu-Diaz purchased three cashier’s checks with U.S. currency totaling \$84,931.75.

26. On or about January 20, 2017, Abreu-Diaz purchased four cashier’s checks with U.S. currency totaling \$109,540.

27. On or about April 25, 2017, ABREU-DIAZ purchased four cashier’s checks with U.S. currency totaling \$115,211.

Enmanuel Nunez-Reyes

28. From on or about December 16, 2016 through on or about September 29, 2017, Defendant Enmanuel Nunez-Reyes (“Nunez-Reyes”) converted approximately \$2,883,257.80 in U.S. currency into approximately 103 cashier’s checks.

29. For example, on or about February 1, 2017, Nunez-Reyes purchased four (4) cashier’s checks with U.S. currency totaling \$111,348.

30. On or about July 26, 2017, Nunez-Reyes purchased five cashier’s checks with U.S. currency totaling \$119,000.