

United States District Court  
District of New Jersey

NOV 20 2019

UNITED STATES OF AMERICA

v.

EDWIN DELEON-BATISTA

: **FILED UNDER SEAL**

: Mag. No. 19-8427

: **CRIMINAL COMPLAINT**

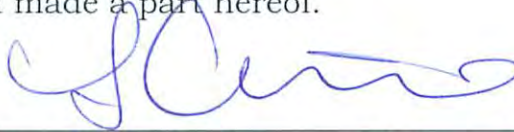
I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

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 20, 2019



City and State: Newark, New Jersey

HON. LEDA DUNN WETTRE  
United States Magistrate Judge

**ATTACHMENT A**

**COUNT ONE**

(Conspiracy to Commit Money Laundering)

From in or around March 2018 through in or around October 2019, in Essex County, in the District of New Jersey, and elsewhere, the Defendant,

EDWIN DELEON-BATISTA

did knowingly and intentionally conspire and agree with 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 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 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 monetary transactions 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**  
(Identity Fraud)

From in or around May 2019 through in or around October 2019, the Defendant,

EDWIN DELEON-BATISTA

did knowingly possess and use in or affecting interstate or foreign commerce, without lawful authority, a means of identification of another person, to wit, a Florida Driver's License ending #83630, knowing that the means of identification belonged to another actual person, with the intent to commit, or to aid or abet, or in connection with, any unlawful activity that constitutes a violation of Federal law, to wit, conspiracy to commit money laundering in violation of 18 U.S.C. § 1956(h), and as a result of the offense, the defendant or any other individual committing the offense, obtained anything of value aggregating \$1,000 or more during any 1 year period.

All in violation of Title 18, United States Code, Section 1028(a)(7) and (b)(1)(D).

## **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. A joint investigation by the DEA and the Internal Revenue Service-Criminal Investigation has revealed that the Defendant, EDWIN DELEON-BATISTA ("DELEON") is a money launderer operating in New Jersey, New York, and Florida. DELEON coordinates with co-conspirators to facilitate the transfer of cash proceeds of illegal drug sales in the United States to drug trafficking organizations with ties to the Dominican Republic, Colombia, and elsewhere.

2. The investigation has revealed that DELEON agreed with known and unknown co-conspirators to pick up large quantities of U.S. currency, which constituted proceeds of illegal drug sales in New Jersey and New York. DELEON then converted the cash proceeds to cashier's checks made payable to companies and individuals. Other co-conspirators with close ties to drug trafficking organizations provided DELEON with information regarding the individuals and companies to which the checks should be made payable as well as the amounts for each check. DELEON converted the cash to cashier's checks as part of a scheme designed to conceal the nature, source, ownership, and control of the illegal drug proceeds in order to avoid scrutiny by law enforcement and banking institutions.

3. Bank records obtained by law enforcement have revealed that between in or around March 2018 through in or around March 2019, DELEON converted over \$13,000,000 in U.S. currency into cashier's checks at banks in New Jersey, New York, and elsewhere. For this service, DELEON was paid approximately 1% of the total amount of U.S. currency that he converted into cashier's checks.

4. On or about April 16, 2019, DELEON was arrested in New York City after the police stopped his vehicle and discovered approximately \$451,799 in U.S. currency in a box. Based on this incident, DELEON was charged by criminal complaint in the Southern District of New York with conspiracy to commit money laundering. Those charges remain pending.

5. After his arrest on April 16, 2019, DELEON began using a stolen identity in order to continue his money laundering activities. Specifically, on or about May 16, 2019, DELEON fraudulently obtained a driver's license ending in #83630 issued by the Florida Department of Highway Safety and Motor Vehicles (the "Fraudulent License") in the name of another individual ("Individual-1") with an address in Miami, Florida. The official photograph on the Fraudulent License is that of DELEON.

6. That same day—on or about May 16, 2019—DELEON used the Fraudulent License as proof of identification to open a bank account in the name of Individual-1 at JP Morgan Chase Bank.

7. On or about June 10, 2019, a person purporting to be Individual-1 filed Articles of Incorporation in Florida for a limited liability company called IMX Financial Consultants, LLC ("IMX"). Individual-1 was listed as the Manager and Registered Agent of IMX.

8. Thereafter, in or around July 2019, DELEON used the Fraudulent License as proof of identification to open a bank account at TD Bank in the name of IMX. Individual-1 was listed as the sole signatory on the account.

9. Based on bank records obtained by law enforcement, DELEON also used the Fraudulent License to open bank accounts in the name of Individual-1 and/or IMX at other banks with nationwide branches including Wells Fargo and Bank of America.

10. Once the accounts were opened, DELEON used the same Fraudulent License to convert large sums of U.S. currency to cashier's checks in a pattern similar to that used by DELEON before his arrest. Based on bank records and surveillance videos and images obtained, law enforcement believes that from in or around June 2019 through in or around October 2019, DELEON used the Fraudulent License to convert over \$10,000,000 of U.S. currency into cashier's checks at bank branches in New Jersey, New York, and Florida as part of a continuing money laundering conspiracy.

11. On or about November 18, 2019, federal law enforcement agents interviewed Individual-1. Individual-1 stated that he has not traveled to New Jersey, New York, or Florida in approximately fifteen years, maintains no bank accounts, and has not permitted anyone to utilize his identity or sold his identity for monetary gain.