

ATTACHMENT A

COUNT ONE

(Conspiracy to Commit Money Laundering)

From in or around August 2020 through on or about October 27, 2020, in Bergen County, in the District of New Jersey, the defendant,

RAMFIS MINAYA,

did knowingly and intentionally conspire and agree with others to conduct a financial transaction affecting interstate and foreign commerce, which in fact involved the proceeds of a specified unlawful activity, that is, the distribution of a controlled substance, with the intent to promote the carrying on of such specified unlawful activity, and knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(A)(i).

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

ATTACHMENT B

I, Robert Fernandez, am a Task Force Officer with the United States Drug Enforcement Administration. 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 photographs of the evidence. Where statements of others are related herein, they are related in substance and part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. Since in or around 2019, the United States Drug Enforcement Administration (“DEA”) has been investigating a drug trafficking and money laundering organization (“DTO/MLO”) operating in Mexico, New York, New Jersey, and elsewhere. During the course of this investigation, law enforcement has learned that the DTO/MLO conducts money laundering transactions through the use of couriers with the objective of repatriating narcotics proceeds to narcotics source countries.

2. In or around August 2020, law enforcement identified defendant Ramfis Minaya (“MINAYA”) as a member of the DTO/MLO who is responsible for the transportation and delivery of significant quantities of narcotics proceeds. Moreover, since in or around August 2020 through on or about October 27, 2020, law enforcement has seized more than five million dollars (\$5,000,000) in United States currency from money laundering transactions and stashes of narcotics proceeds in which MINAYA was directly involved.

3. For example, on or about the week of August 24, 2020, law enforcement observed MINAYA meet with an individual (“Individual-1”) in the area of Queens, New York. At that time, MINAYA provided Individual-1 with a large weighted suitcase. As a result of law enforcement’s observations, and the investigation, the DEA stopped Individual-1 and found the suitcase delivered by MINAYA to contain approximately one million dollars (\$1,000,000) in narcotics proceeds.

4. On or about October 27, 2020, law enforcement observed MINAYA meet with another individual (“Individual-2”) in the area of Englewood, New Jersey. At that time, law enforcement observed MINAYA exit his residence located in Englewood, New Jersey (the “Englewood residence”) and provide “Individual-2” with a weighed bag. As a result of law enforcement’s observations, and the investigation, the DEA stopped Individual-2 and found that the bag delivered by MINAYA to contain approximately one hundred thousand dollars (\$100,000) in narcotics proceeds.

5. Thereafter, law enforcement observed MINAYA exit his Englewood residence with a weighted bag. As a result of law enforcement's previous observations and the investigation to date, law enforcement stopped MINAYA and found him to be in possession of approximately one hundred thousand dollars (\$100,000) in narcotics proceeds.

6. After arresting MINAYA, law enforcement, pursuant to a search warrant, conducted a search of MINAYA's Englewood residence. Within the Englewood residence, law enforcement recovered more than five million dollars (\$5,000,000) in narcotics proceeds, a money counter, a ledger, and various other indicia of money laundering activity. Based on law enforcement's review of this evidence, and the investigation to date, it is apparent that MINAYA is responsible for the laundering of millions of dollars in narcotics proceeds.