

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

	:
	: Hon. Katharine S. Hayden
UNITED STATES OF AMERICA	:
	: Crim. No.
v.	:
	: 18 U.S.C. § 1956(h)
EDWIN DELEON-BATISTA	: 18 U.S.C. § 1028(a)(7) & (b)(2)
	: 18 U.S.C. § 2
	:

I N F O R M A T I O N

The Defendant having waived in open court prosecution by indictment, the Acting United States Attorney for the District of New Jersey charges:

COUNT ONE
(Conspiracy to Launder Monetary Instruments)

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

EDWIN DELEON-BATISTA

did knowingly and intentionally conspire and agree with other persons to knowingly engage and attempt to engage in monetary transactions by, through, or to a financial institution, in and affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, derived from a specified unlawful activity—that is, distribution and possession with intent to distribute a controlled substance and conspiracy to do so, 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
(Identify Theft)

From in or around May 2019 through in or around October 2019, in the District of New Jersey, and elsewhere, 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 in #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).

In violation of Title 18, United States Code, Section 1028(a)(7) & (b)(2).

FORFEITURE ALLEGATION AS TO COUNT ONE

1. As a result of committing the money laundering offense charged in Count One of this Information, defendant EDWIN DELEON-BATISTA shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), all property, real or personal, involved in such money laundering offense, and all property traceable to such property.

FORFEITURE ALLEGATION AS TO COUNT TWO

2. As a result of committing the offenses in violation of 18 U.S.C. § 1028 alleged in Count Two of this Information, defendant EDWIN DELEON-BATISTA shall forfeit to the United States:

- a. pursuant to 18 U.S.C. § 982(a)(2)(B), any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such offenses; and
- b. pursuant to 18 U.S.C. § 1028(h), any and all illicit authentication features, identification documents, document-making implements and means of identification.

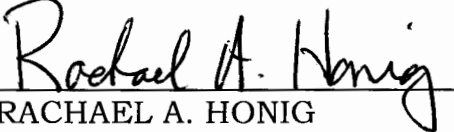
SUBSTITUTE ASSETS PROVISION
(Applicable to All Forfeiture Allegations)

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

- 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 21 U.S.C. § 853(p) (as incorporated by 28 U.S.C. § 2461(c), and 18 U.S.C. § 982(b)), to forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.


RACHAEL A. HONIG
Acting United States Attorney

CASE NUMBER: _____

**United States District Court
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UNITED STATES OF AMERICA

v.

EDWIN DELEON-BATISTA

INFORMATION FOR

**18 U.S.C. § 1956(h)
18 U.S.C. § 1028(a)(7) & (b)(2)
18 U.S.C. § 2**

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