

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.  
: :  
v. : Crim. No.  
: :  
HANS PIERRE : 18 U.S.C. § 1956

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:

Background

1. At all times relevant to this Information:

a. CashApp was a web application provided by Square, Inc.

Cash App is an application that users could download onto an iOS or Android device. Once downloaded, the user then would provide the application his or her mobile number or email to create a unique username, called a “\$Cashtag.” Creation of a \$Cashtag automatically created a shareable web address through which others can make payments. The application also allowed users to link a bank account or debit card information to the account.

b. Zelle was an electronic money transfer program. A Zelle user could transfer money by enrolling an email account or mobile number, either through certain mobile banking applications or through Zelle’s application. After registering, to transfer money, the user would enter a preferred email address or mobile number of the recipient and the amount the user wanted to transfer to that recipient.

The Conspiracy

2. From in or around January 2018 through in or around October 2020, in Essex County, in the District of New Jersey and elsewhere, the defendant

**HANS PIERRE,**

did knowingly combine, conspire, and agree with others to conduct and attempt to conduct financial transactions affecting interstate commerce, which involved the proceeds of a specified unlawful activity, that is, bank fraud conspiracy, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, contrary to 1956(a)(1)(B)(i).

Goal of the Conspiracy

3. The goal of the conspiracy was for PIERRE and others to conduct financial transactions involving money obtained from fraudulently deposited checks to conceal and disguise the history and source of those funds.

Manner and Means of the Conspiracy

4. The coconspirators obtained checks written on bank accounts belonging to residents in the Newark, New Jersey area and elsewhere by stealing mail containing the checks from United States Post Office collection boxes.

5. The coconspirators took checks that were stolen from the mail and altered them so they appeared to be written payable to a different recipient and for a larger amount.

6. The coconspirators created counterfeit checks based on checks that were stolen from the mail in the Newark, New Jersey area.

7. The coconspirators, including PIERRE, solicited other coconspirators to deposit into their bank accounts the stolen, altered checks (the "Coconspirator Accounts").

8. The coconspirators, including PIERRE, deposited the stolen, altered checks and counterfeit checks into their own accounts and into the Coconspirator Accounts.

9. The coconspirators then withdrew money obtained from the illegally deposited checks, including by making cash withdrawals at ATM machines with other coconspirators' debit cards.

10. The coconspirators also transferred to other coconspirators, including PIERRE, money obtained from the illegally deposited checks, including by making transfers through CashApp and Zelle.

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

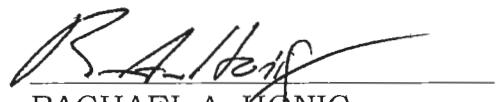
**FORFEITURE ALLEGATION**

1. As a result of committing the money laundering offense charged in this Information, the defendant 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.

2. 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,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of such defendant up to the value of the forfeitable property described in Forfeiture Allegation paragraph 1.



RACHAEL A. HONIG  
Acting United States Attorney