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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

FILED

JAN 30 2020

AT 8:30                      PM  
WILLIAM T. WALSH, CLERK  
406 JB

UNITED STATES OF AMERICA

v.

LUIS EDUARDO VELAZQUEZ-  
CORDERO,

a/k/a "El Pequeño"

Crim. No. 20-106 (KSH)

18 U.S.C. §§ 1956(a)(1)(B)(i) and (h)

18 U.S.C. § 1957(a)

18 U.S.C. § 2

I HEREBY CERTIFY that the above and  
foregoing is a true and correct copy of  
the original on file in my office.

ATTEST 1-31-2020  
WILLIAM T. WALSH, Clerk  
United States District Court  
District of New Jersey

**INDICTMENT**

By:                                       
Deputy Clerk

The Grand Jury in and for the District of New Jersey, sitting at Newark,  
charges:

**COUNT ONE**

(Conspiracy to Launder Monetary Instruments and Engage in Monetary  
Transactions in Property Derived from Specified Unlawful Activity)

**THE CONSPIRACY**

1. From an unknown date, but from at least in or around August  
2016, through in or around December 2019, in the District of New Jersey and  
elsewhere, the defendant,

LUIS EDUARDO VELAZQUEZ-CORDERO,  
a/k/a "El Pequeño,"

did knowingly and intentionally conspire and agree with other persons known  
and unknown to the Grand Jury to commit offenses against the United States  
in violation of Title 18, United States Code, Sections 1956 and 1957, to wit:

- a) to knowingly conduct and attempt to conduct financial  
transactions in and affecting interstate and foreign commerce,

which involved the proceeds of specified unlawful activity—that is, distribution and possession with intent to distribute a controlled substance and conspiracy to do so—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, 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);

- b) to transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds involving the proceeds of specified unlawful activity—that is, distribution and possession with intent to distribute a controlled substance and conspiracy to do so—from a place in the United States to and through a place outside the United States, namely the Dominican Republic and elsewhere, knowing that the monetary instrument and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer 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, contrary to Title 18, United States Code, Section 1956(a)(2)(B)(i); and

- c) to transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds represented by a law enforcement officer or by another person at the direction of, or with the approval of, a Federal official, to be the proceeds of specified unlawful activity—that is, distribution and possession with intent to distribute a controlled substance and conspiracy to do so—from a place in the United States to and through a place outside the United States, namely, the Dominican Republic and elsewhere, believing that the monetary instrument and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and that such transportation, transmission, and transfer 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, contrary to Title 18, United States Code, Section 1956(a)(2)(B)(i); and
- d) 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).

### **MANNER AND MEANS OF THE CONSPIRACY**

2. It was part of the conspiracy that LUIS EDUARDO VELAZQUEZ-CORDERO directed co-conspirators in the United States to pick-up large quantities of U.S. currency, which were proceeds of illegal drug distribution (the "cash drug proceeds"), and to use the United States banking system to launder the cash drug proceeds and facilitate the return of the cash drug proceeds to drug trafficking organizations.

3. It was further part of the conspiracy that LUIS EDUARDO VELAZQUEZ-CORDERO directed co-conspirators to convert the cash drug proceeds into cashier's checks.

4. It was further part of the conspiracy that LUIS EDUARDO VELAZQUEZ-CORDERO provided co-conspirators with instructions regarding the amount of each cashier's check and the name of the payee of each cashier's check.

5. It was further part of the conspiracy that LUIS EDUARDO VELAZQUEZ-CORDERO directed co-conspirators to deposit the cashier's checks into bank accounts he specified.

6. It was further part of the conspiracy that LUIS EDUARDO VELAZQUEZ-CORDERO directed co-conspirators to send the cashier's checks to other co-conspirators in the United States and the Dominican Republic to be cashed or deposited.

7. It was further part of the conspiracy that LUIS EDUARDO VELAZQUEZ-CORDERO also directed others to deposit the cash drug proceeds in bank accounts and then conduct wire transfers of the funds to other bank accounts.

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

**COUNTS TWO AND THREE**  
(Money Laundering)

8. On or about the dates set forth below, in the District of New Jersey and elsewhere, the defendant,

LUIS EDUARDO VELAZQUEZ-CORDERO,  
a/k/a "El Pequeño,"

did knowingly conduct and attempt to conduct the following financial transactions affecting interstate and foreign commerce, which in fact involved the proceeds of specified unlawful activity—that is, distribution and possession with intent to distribute a controlled substance and conspiracy to do so—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 the specified unlawful activity and that the property involved in the financial transactions represented the proceeds of some form of unlawful activity.

COUNT	DATE	TRANSACTION	AMOUNT
2	1/26/2017	Cashier's check purchase with U.S. currency from JP Morgan Chase bank	\$27,972
3	4/24/2018	Cashier's check purchase with U.S. currency from Wells Fargo bank	\$35,550

All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i)  
and Title 18, United States Code, Section 2.

**COUNTS FOUR AND FIVE**  
(Engaging in Monetary Transactions in Property  
Derived from Specified Unlawful Activity)

9. On or about the dates set forth below, in the District of New Jersey  
and elsewhere, the defendant,

LUIS EDUARDO VELAZQUEZ-CORDERO,  
a/k/a "El Pequeño,"

did knowingly engage and attempt to engage in the monetary transactions set  
forth below, by, through, and 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.

COUNT	DATE	TRANSACTION	AMOUNT
4	9/21/2017	Cashier's check purchase with U.S. currency from Capital One bank	\$32,000
5	4/12/2018	Cashier's check purchase with U.S. currency from Wells Fargo bank	\$30,330

All in violation of Title 18, United States Code, Section 1957(a) and Title  
18, United States Code, Section 2.

### **Forfeiture Allegations**

1. The allegations contained in all paragraphs of Counts One through Five of this Indictment are incorporated by reference as if set forth in full herein for the purpose of noticing forfeitures.

2. Upon conviction of the money laundering offenses in violation of 18 U.S.C. §§ 1956 and 1957 alleged in Counts One through Five of this Indictment, LUIS EDUARDO VELAZQUEZ-CORDERO shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), all property, real and personal, involved in the money laundering offense, and all property traceable to such property.

3. The property to be forfeited includes, but is not limited to, a money judgment in the amount of \$80,000,000 representing the property involved in the money laundering offenses charged in Counts One through Five and all property traceable to such property; and all right, title, and all Defendant's interest in the following:

- A. A total of approximately \$1,484,456.45 in United States currency comprised of:
  - 1) Approximately \$1,136,997.41 formerly contained in the Citibank account ending in 4061, held in the name of OASM International Services, Inc.;
  - 2) Approximately \$347,459.04 formerly contained in the Bank of America Account ending in 1560, held in the name of OASM International Services, Inc;

(hereinafter referred to collectively as the "Specific Properties").

**Substitute Assets Provision**

4. If any of the property described above as being subject to forfeiture, as result of any act or omission of the defendant LUIS EDUARDO VELAZQUEZ-CORDERO

(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

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property.

A TRUE BILL

FOREP

  
CRAIG CARPENITO  
United States Attorney



CASE NUMBER: 20-106(KSH)

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**United States District Court  
District of New Jersey**

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**UNITED STATES OF AMERICA**

**v.**

**LUIS EDUARDO VELAZQUEZ-CORDERO  
a/k/a "El Pequeño"**

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**INDICTMENT FOR**

18 U.S.C. §§ 1956(a) and (h)  
18 U.S.C. § 1957  
18 U.S.C. § 2

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**A True Bill,**

  
**Foreperson**

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**CRAIG CARPENITO**

*UNITED STATES ATTORNEY  
FOR THE DISTRICT OF NEW JERSEY*

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**JONATHAN M. PECK**

*ASSISTANT UNITED STATES ATTORNEY*

*NEWARK, NEW JERSEY  
(973) 645-2700*

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