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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

FEB 27 2020

AT 8:30

4:11 PM

WILLIAM T. WALSH  
CLERK

AT 8:30  
20-207-KSH  
WILLIAM T. WALSH, CLERK

UNITED STATES OF AMERICA

v.

JONATHAN HUMEAU-HERNANDEZ

Crim. No.

20-207 (KSH)

18 U.S.C. §§ 1956(a)(1)(B)(i) and (h)

18 U.S.C. § 1957(a)

18 U.S.C. § 2

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

ATTEST 3/2/20  
WILLIAM T. WALSH, Clerk  
United States District Court  
District of New Jersey

**INDICTMENT**

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 at least in or around November 2018, through in or around  
February 2020, in the District of New Jersey and elsewhere, the defendant,

JONATHAN HUMEAU-HERNANDEZ,

did knowingly and intentionally conspire and agree with other persons known  
and unknown to the Grand Jury:

- a) to knowingly conduct and attempt to conduct a financial  
transaction 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 knowingly conduct and attempt to conduct a financial transaction in and affecting interstate and foreign commerce, which involved property represented to be the proceeds of specified unlawful activity and property used to conduct or facilitate specified unlawful activity—that is, distribution and possession with intent to distribute a controlled substance and conspiracy to do so—with the intent to conceal and disguise the nature, location, source, ownership, and control of property believed to be the proceeds of specified unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(3)(B);
- c) 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

- 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 JONATHAN HUMEAU-HERNANDEZ coordinated with co-conspirators in the United States to drop off and/or pick-up large quantities of U.S. currency, which were the proceeds of illegal drug distribution (the “cash drug proceeds”), and to use the United States banking system to launder the cash drug proceeds from the United States to locations inside and outside the United States.

3. It was further part of the conspiracy that JONATHAN HUMEAU-HERNANDEZ directed co-conspirators to deposit the cash drug proceeds into

bank accounts and in amounts specified by JONATHAN HUMEAU-  
HERNANDEZ.

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)

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

JONATHAN HUMEAU-HERNANDEZ

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	5/7/2019	Cashier's check deposit into Bank of America account ending 0125	\$30,000
3	10/18/2019	Wire transfer into Bank of America account ending 0795	\$50,000

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)

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

JONATHAN HUMEAU-HERNANDEZ

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	5/10/2019	Cashier's check deposit into Bank of America account ending 0736	\$35,000
5	10/18/2019	Wire transfer into Bank of America account ending 1338	\$54,970

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, JONATHAN HUMEAU-HERNANDEZ 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 offenses, and all property traceable to such property.

**Substitute Assets Provision**

3. If any of the property described above as being subject to forfeiture, as result of any act or omission of the defendant JONATHAN HUMEAU-HERNANDEZ

- (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

FOREPERSON

  
CRAIG CARPENITO  
United States Attorney



**CASE NUMBER: 20-CR-207-KSH**

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

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**UNITED STATES OF AMERICA**

**v.**

**JONATHAN HUMEAU-HERNANDEZ**

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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,**

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**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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