# UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.

:

v. : Crim. No. 22-

RODRIGO ALVARENGA PAREDES : 18 U.S.C. § 1960

#### INFORMATION

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

#### **COUNT ONE**

(Engaging in an Unlicensed Money Transmitting Business)

From in or around March 2018 through in or around November 2019, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

#### RODRIGO ALVARENGA PAREDES,

knowingly conducted, controlled, managed, supervised, directed, and owned a money transmitting business, which affected interstate or foreign commerce, while failing to comply with the money transmitting business registration requirements under 31 U.S.C. § 5330 or the regulations prescribed under that section.

In violation of Title 18, United States Code, Section 1960.

#### FORFEITURE ALLEGATION

1. As the result of committing the unlicensed money transmitting offense in violation of 18 U.S.C. § 1960 alleged in this Information, the defendant,

#### RODRIGO ALVARENGA PAREDES,

shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2), all property, real and personal involved in the offense and all property traceable to such property, including, but not limited to all of the defendant's right, title, or interest in \$119,049.00 in U.S. currency.

#### Substitute Assets Provision

- 2. If any of the property described above, 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 18 U.S.C. § 982(b), to forfeiture of any other property of the defendant's up to the value of the above-described forfeitable property. It is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture

of any other property of the said defendant up to the value of the above forfeitable property.

PHILIP R. SELLINGER

United States Attorney

| CASE | NUMBER: |  |
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# **United States District Court District of New Jersey**

# **UNITED STATES OF AMERICA**

V.

# **RODRIGO ALVARENGA PAREDES**

### **INFORMATION FOR**

18 U.S.C. § 1960

## PHILIP R. SELLINGER

UNITED STATES ATTORNEY, NEWARK, NEW JERSEY

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