

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**24 MAG 1492**

UNITED STATES OF AMERICA

v.

DAVID ELIGOOOLA,

Defendant.

**SEALED COMPLAINT**

Violation of 18 U.S.C. § 1956(h)

COUNTY OF OFFENSE:  
NEW YORK

SOUTHERN DISTRICT OF NEW YORK, ss.:

LARISSA MONTES, being duly sworn, deposes and says that she is a Special Agent with the Federal Bureau of Investigation (“FBI”), and charges as follows:

**COUNT ONE**  
**(Money Laundering Conspiracy)**

1. From at least in or about June 2022 up to and including in or about July 2023, in the Southern District of New York and elsewhere, DAVID ELIGOOOLA, the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit money laundering, in violation of Title 18, United States Code, Section 1956(a)(3)(B).

2. It was a part and an object of the conspiracy that DAVID ELIGOOOLA, the defendant, and others known and unknown, 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, to wit, narcotics trafficking, in violation of Title 21, United States Code, Section 841, would and did conduct and attempt to conduct a financial transaction, which transaction affected interstate and foreign commerce and involved the use of a financial institution which was engaged in, and the activities of which affected, interstate and foreign commerce, involving property represented to be the proceeds of specified unlawful activity, to wit, the proceeds of narcotics trafficking, in violation of Title 21, United States Code, Section 841, in violation of Title 18, United States Code, Section 1956(a)(3)(B).

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

**Summary**

3. The father (“CC-1”) of DAVID ELIGOOOLA, the defendant, arranged to launder money for an individual he understood to be working on behalf of drug cartels in South America, who was, in truth and in fact, an undercover agent with the FBI (“UC-1”). Specifically, UC-1 gave CC-1 large amounts of cash, and CC-1 transferred the funds back to UC-1 via cryptocurrency and

bank wires. CC-1 specifically asked UC-1 if the money constituted drug proceeds, and UC-1 said yes. CC-1 laundered over half a million dollars represented by UC-1 to be narcotics proceeds.

4. That half a million dollars was transferred by undercover agents in cash over several transactions to, variously, DAVID ELIGOOOLA, the defendant, CC-1, and an additional coconspirator. ELIGOOOLA personally received two cash handoffs—one of \$60,000 on March 22, 2023, and one of \$116,000, on May 22, 2023. In ELIGOOOLA’s conversations with those undercover agents, it was clear that he understood that the cash represented proceeds of narcotics trafficking that he was assisting in laundering.

#### **CC-1’s Initial Conversations with FBI Undercover Officers**

5. In or about June 2022, UC-1 began communicating with CC-1 by phone.<sup>1</sup> UC-1 and CC-1 discussed UC-1 transferring money to CC-1.

6. On or about January 17, 2023, CC-1 and UC-1 met in person. That meeting was consensually recorded. Based on my review of the recording and my discussions with other law enforcement officers, I know that the following, in substance and in part, took place at the meeting:

a. CC-1 discussed how he could receive any amount of cash and could transfer it back to UC-1 within five days.

b. CC-1 said that if he received cash from UC-1 in New York and transferred it back to a New York bank account, he would charge a rate of 10 to 12 percent.

c. CC-1 said that an individual working for him would pick up the cash from UC-1.

d. CC-1 said that UC-1 should tell him what CC-1 should tell his bank about why he was wiring the money to UC-1.

e. CC-1 asked if the cash that UC-1 planned to give him was “from drugs.” UC-1 said yes, that the money was from drugs, and that he was “dealing with Colombians.”

f. CC-1 told UC-1 he would charge a lower fee if UC-1 would accept cryptocurrency in exchange for his cash.

g. CC-1 told UC-1 that they should use encrypted messaging applications to discuss their transactions.

h. CC-1 told UC-1 that when UC-1 received the wires from CC-1, “the bank will never ask you a question.”

7. On or about February 14, 2023, CC-1 and UC-1 met in person in New York, New York. That meeting was consensually recorded. Based on my review of the recording and my

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<sup>1</sup> The communications involving FBI undercover agents were recorded, and I know about those communications from reviewing the recordings and reports summarizing the recordings.

discussions with other law enforcement officers, I know that the following, in substance and in part, took place at the meeting:

a. CC-1 told UC-1 that he could launder up to \$1 million in cash per day if CC-1 could transfer the money back to UC-1 in the form of cryptocurrency.

b. UC-1 offered to hand CC-1 \$28,000 in cash at the meeting, in order for CC-1 to launder that cash, but CC-1 told UC-1 that the amount of money was too small, and he would not accept less than \$50,000 in cash at a time.

c. UC-1 and CC-1 discussed that UC-1 would shortly transfer cash to CC-1, and that CC-1 would return the money to him in the form of cryptocurrency and a bank wire.

d. CC-1 and UC-1 discussed what they would tell the bank about the wire transfers. In that context, CC-1 told UC-1 to tell him what UC-1's company was doing. I understand from my training and experience and my involvement in this investigation that CC-1 asked this question in order to effectively deceive the bank when he made a money laundering transfer to UC-1's company.

#### **The First Money-Laundering Transaction of \$60,000**

8. On or about March 22, 2023, DAVID ELIGOOOLA, the defendant, met with UC-1. That meeting was consensually recorded. Based on my review of the recording and my discussions with other law enforcement officers, I know that the following, in substance and in part, took place at the meeting:

a. UC-1 and ELIGOOOLA met at a restaurant. Shortly after meeting UC-1, ELIGOOOLA had a short video call with CC-1 in the presence of UC-1.

b. After the call, UC-1 confirmed that ELIGOOOLA was "familiar with everything." UC-1 explained that he had "60" on him—*i.e.*, \$60,000 in cash—which was part of an "initial test" to see "how fast" CC-1 would return the laundered funds.

c. UC-1 requested that, in addition to cryptocurrency, part of the laundered funds be returned via a bank wire. UC-1 stated that his "friend in South America" was also interested in bank wires. ELIGOOOLA replied that this arrangement should not be a problem.

d. UC-1 said he would also discuss the arrangement with CC-1, but did not like talking about such things over the phone. ELIGOOOLA stated he would tell CC-1 what UC-1 told him. UC-1 said he would also send CC-1 a note.

e. UC-1 then handed ELIGOOOLA a bag containing approximately \$60,000 in cash. After receiving the bag, ELIGOOOLA left for approximately ten minutes to count the cash. CC-1 then returned and confirmed to UC-1 that it was all there.

9. Based on my review of financial records and my discussions with other law enforcement officers, I know that, several days after the March 22, 2023, meeting between UC-1 and DAVID ELIGOOOLA, the defendant, UC-1 received approximately \$45,000 in cryptocurrency

and a bank wire for approximately \$9,000 into accounts that UC-1 had provided to CC-1, from an account held in the name of another individual. These transfers reflected that CC-1 had taken a fee of approximately 10% of the \$60,000 that CC-1 laundered on UC-1's behalf.

### **The Second Money-Laundering Transaction of \$100,000**

10. On or about April 27, 2023, a coconspirator not named herein ("CC-2") met with an additional FBI undercover agent ("UC-2") for a money exchange that had been arranged by UC-1 and CC-1. The meeting was consensually recorded. Based on my review of the recording and my discussions with other law enforcement officers, I know that the following, in substance and in part, took place at the meeting:

- a. UC-2 handed CC-2 approximately \$100,000 in cash.

11. Based on my review of financial records and my discussions with other law enforcement officers, I know that, several days later, UC-1 received approximately \$50,000 in cryptocurrency and a bank wire for approximately \$41,000 into accounts that UC-1 had provided to CC-1. UC-1 therefore paid CC-1 a fee of approximately 9% of the \$100,000 that CC-1 laundered on UC-1's behalf.

### **The Third Money-Laundering Transaction of \$116,000**

12. On or about May 22, 2023, DAVID ELIGOOOLA, the defendant, met with UC-2 for a money exchange that had been arranged by UC-1 and CC-1. The meeting was consensually recorded. Based on my review of the recording and my discussions with other law enforcement officers, I know that the following, in substance and in part, took place at the meeting:

- a. Upon meeting ELIGOOOLA in UC-2's car, UC-2 apologized for being late, and explained that UC-2 "had to meet up with our other cartel guys here to get the money."

- b. UC-2 handed ELIGOOOLA a white plastic bag containing approximately \$116,000 in cash. While still in UC-2's car, ELIGOOOLA proceeded to count the \$116,000 in cash.

13. Based on my review of financial records and my discussions with other law enforcement officers, I know that, several days later, UC-1 received approximately \$60,000 in cryptocurrency and a bank wire for approximately \$45,000 into accounts that UC-1 had provided to CC-1. UC-1 therefore paid CC-1 a fee of approximately 9% of the \$116,000 that CC-1 laundered on UC-1's behalf.

### **The Fourth Money-Laundering Transaction of \$120,000**

14. On or about June 14, 2023, CC-1, and UC-1 met in person in New York, New York. That meeting was consensually recorded. Based on my review of the recording and my discussions with other law enforcement officers, I know that the following, in substance and in part, took place at the meeting:

- a. UC-1 handed CC-1 approximately \$120,000 in cash.

b. CC-1 told UC-1 that he was disappointed that UC-1 was transferring such small amounts of cash to him, and said that he had expected to be receiving \$1 million per week from him.

15. Based on my review of financial records and my discussions with other law enforcement officers, I know that several days later, UC-1 received approximately \$100,000 in cryptocurrency and a bank wire for approximately \$8,000 into accounts that UC-1 had designated to CC-1. UC-1 therefore paid CC-1 a fee of approximately 9% of the \$120,000 that CC-1 laundered on UC-1's behalf.

**The Fifth Money-Laundering Transaction of \$150,000**

16. On or about July 21, 2023, CC-1, UC-1, and other undercover FBI agents met in person in Miami, Florida. That meeting was consensually recorded. Based on my review of the recording and my discussions with other law enforcement officers, I know that the following, in substance and in part, took place at the meeting:

a. UC-1 handed CC-1 approximately \$150,000 in cash.


17. Based on my review of financial records and my discussions with other law enforcement officers, I know that, several days after the July 21, 2023, meeting between CC-1, UC-1, and other undercover FBI agents, UC-1 received approximately \$90,000 in cryptocurrency and two bank wires totaling approximately \$45,000 into accounts that UC-1 had designated to CC-1. UC-1 therefore paid CC-1 a fee of approximately 9% of the \$150,000 that CC-1 laundered on UC-1's behalf.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of DAVID ELIGOOOLA, the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.

/s authorized electronic signature

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LARISSA MONTES  
Special Agent  
Federal Bureau of Investigation

Sworn to me through the transmission of this Complaint by reliable electronic means, this 13 day of April, 2024.

  
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THE HONORABLE SARAH NETBURN  
United States Magistrate Judge  
Southern District of New York