

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	
	:	
- v. -	:	<u>SEALED</u>
	:	<u>INDICTMENT</u>
KASSEM HIJAZI,	:	
	:	21 Cr. _____
Defendant.	:	
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	x	

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

The Grand Jury charges:

1. In or about December 2019, in the Southern District of New York and elsewhere, KASSEM HIJAZI, the defendant, 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, conducted and attempted to conduct a financial transaction involving property represented to be the proceeds of specified unlawful activity, to wit, the proceeds of narcotics trafficking.

(Title 18, United States Code, Sections 1956(a)(3)(B) and 2.)

**COUNT TWO**  
**(Money Laundering)**

The Grand Jury further charges:

2. From at least in or about October 2020 through at least in or about December 2020, in the Southern District of New

York and elsewhere, KASSEM HIJAZI, the defendant, 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, conducted and attempted to conduct a financial transaction involving property represented to be the proceeds of specified unlawful activity, to wit, the proceeds of narcotics trafficking.

(Title 18, United States Code, Sections 1956(a)(3)(B) and 2.)

**COUNT THREE**

**(Operation of an Unlicensed Money Transmitting Business)**

The Grand Jury further charges:

3. From at least in or about 2018 up to and including at least in or about 2020, in the Southern District of New York and elsewhere, KASSEM HIJAZI, the defendant, knowingly conducted, controlled, managed, supervised, directed, and owned all and part of an unlicensed money transmitting business affecting interstate and foreign commerce, to wit, HIJAZI transmitted money into, through, and out of the United States, including to and from the Southern District of New York, without an appropriate state license, which conduct was punishable as a misdemeanor and felony under New York, Florida, Colorado, New Jersey, Michigan, Massachusetts, and South Carolina, and without

meeting the Federal registration requirements set forth for money transmitting businesses.

(Title 18, United States Code, Sections 1960 and 2.)

**COUNT FOUR**  
**(International Money Laundering)**

The Grand Jury further charges:

4. In or about December 2019, in the Southern District of New York and elsewhere, KASSEM HIJAZI, the defendant, transported, transmitted, and transferred, and attempted to transport, transmit, and transfer, a monetary instrument and funds from a place in the United States to and through a place outside the United States, and to a place in the United States from and through a place outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, the operation of an unlicensed money transmitting business, in violation of Title 18, United States Code, Section 1960.

(Title 18, United States Code, Sections 1956(a)(2)(A) and 2.)

**COUNT Five**  
**(International Money Laundering)**

The Grand Jury further charges:

5. From in or about October 2020 through in or about December 2020, in the Southern District of New York and elsewhere, KASSEM HIJAZI, the defendant, transported, transmitted, and transferred, and attempted to transport,

transmit, and transfer, a monetary instrument and funds from a place in the United States to and through a place outside the United States, and to a place in the United States from and through a place outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, the operation of an unlicensed money transmitting business, in violation of Title 18, United States Code, Section 1960.

(Title 18, United States Code, Sections 1956(a)(2)(A) and 2.)

**FORFEITURE ALLEGATION**

6. As a result of committing the offenses alleged in Counts One through Five of this Indictment, KASSEM HIJAZI, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real or personal, involved in the offenses alleged in Counts One through Three of this Indictment, and any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offense and the following specific property:

a. \$200,000 deposited into a bank account controlled by the Drug Enforcement Administration (the "DEA Account") between on or about August 16, 2019 and on or about August 22, 2019;

b. \$342,000 deposited into the DEA Account between on or about September 9, 2019 and on or about September 18, 2019;

c. \$342,727.31 deposited into the DEA Account between on or about September 23, 2019 and on or about November 13, 2019;

d. \$130,000 deposited into a bank account controlled by the Department of Homeland Security, Homeland Security Investigations (the "HSI Account") on or about December 17, 2019;

e. \$122,000 deposited into the DEA Account on or about December 17, 2019;

f. \$193,261.41 deposited into the DEA Account between on or about February 5, 2020 and on or about February 6, 2020;

g. \$346,390 deposited into the DEA Account between on or about October 7, 2020 and on or about October 22, 2020.

**Substitute Asset Provision**

7. If any of the above-described forfeitable property, 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;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants, up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982;  
Title 21, United States Code, Section 853(p); and  
Title 28, United States Code, Section 2461(c).)

  
FOREPERSON

*Audrey Strauss*

AUDREY STRAUSS  
United States Attorney

