

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

	:	
	:	Hon. Katharine S. Hayden
UNITED STATES OF AMERICA	:	
	:	Crim. No.
v.	:	
	:	18 U.S.C. § 1960(a), (b)(1)(C)
WILLY CRUZ-BONILLA	:	18 U.S.C. § 2
	:	
	:	

I N F O R M A T I O N

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

COUNT ONE

(Aiding and Abetting Operation of an Unlicensed Money Transmitting Business)

From in or around August 2016 through in or around August 2017, in the District of New Jersey, and elsewhere, the Defendant,

WILLY CRUZ-BONILLA

knowingly conducted, controlled, managed, supervised, directed, and owned all or part of an unlicensed money transmitting business, and aided and abetted the conduct, control, management, supervision, direction, and ownership of such a money transmitting business, which business affected interstate and foreign commerce, and otherwise involved the transportation or transmission of funds that were known to the defendant to have been derived from a criminal offense and were intended to be used to promote or support unlawful activity.

In violation of Title 18, United State Code, Section 1960(a), (b)(1)(C), and Section 2.

FORFEITURE ALLEGATION


1. As a result of committing the offense charged in Count One of this Information, defendant WILLY CRUZ-BONILLA shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), all property, real or personal, involved in such offense, and all property traceable to such property.

SUBSTITUTE ASSETS PROVISION

2. 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;

the United States shall be entitled, pursuant to 21 U.S.C. § 853(p) (as incorporated by 28 U.S.C. § 2461(c), and 18 U.S.C. § 982(b)), to forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.


RACHAEL A. HONIG
Acting United States Attorney