

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

UNITED STATES OF AMERICA	:	Hon. Brian R. Martinotti
	:	
v.	:	Crim. No.
	:	
GILBERTO MARTINEZ	:	18 U.S.C. § 1956(h)
	:	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 United States Attorney for the District of New Jersey charges:

COUNT ONE
(Conspiracy to Launder Monetary Instruments)

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

GILBERTO MARTINEZ,

did knowingly and intentionally conspire and agree with other persons, known and unknown, to conduct and attempt to conduct financial transactions 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 transactions were 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).

In violation of Title 18, United State Code, Section 1956(h) and Section 2.

FORFEITURE ALLEGATION


1. As a result of committing the offense charged in Count One of this Information, defendant GILBERTO MARTINEZ 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 defendant:

- 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.



PHILIP R. SELLINGER
United States Attorney

CASE NUMBER: _____

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v.

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INFORMATION FOR

18 U.S.C. § 1956(h)

18 U.S.C. § 2

PHILIP R. SELLINGER
UNITED STATES ATTORNEY
FOR THE DISTRICT OF NEW JERSEY

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