

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
:
UNITED STATES OF AMERICA :
:
- v. - :
:
JEREMIAS JIMENEZ CRUZ, and :
JESSIKA FUENTES SANCHEZ, :
:
Defendants. :
:
- - - - - X

SEALED
INDICTMENT

19 Cr.
19 CRIM 326

COUNT ONE

The Grand Jury charges:

1. From at least in or about 2015, up to and including the present, in the Southern District of New York and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district, JEREMIAS JIMENEZ CRUZ and JESSIKA FUENTES SANCHEZ, the defendants, who are expected to be first brought to and arrested in the Southern District of New York, and whose port of entry is expected to be the Southern District of New York, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that JEREMIAS JIMENEZ CRUZ and JESSIKA FUENTES SANCHEZ, the defendants, and others known and unknown, would and did

knowingly and intentionally import into the United States and into the customs territory of the United States from a place outside thereof controlled substances, in violation of Title 21, United States Code, Sections 952(a) and 960(a)(1).

3. It was further a part and an object of the conspiracy that JEREMIAS JIMENEZ CRUZ and JESSIKA FUENTES SANCHEZ, the defendants, would and did manufacture, possess with intent to distribute, and distribute a controlled substance, intending, knowing, and having reasonable cause to believe that such substance would be unlawfully imported into the United States and into waters within 12 miles of the coast of the United States, in violation of Title 21, United States Code, Sections 959(a) and 960(a)(3).

4. The controlled substance involved in the offense was five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 960(b)(1)(B)(ii).

(Title 21, United States Code, Sections 952(a), 959(a), 959(d), 960(2), 960(b)(1)(B)(ii), and 963; Title 18, United States Code, Section 3230.)

COUNT TWO

The Grand Jury further charges:

5. From at least in or about 2015 up to and including the present, in the Southern District of New York and elsewhere, and in an offense begun and committed out of the jurisdiction of any

particular State or district, JEREMIAS JIMENEZ CRUZ and JESSIKA FUENTES SANCHEZ, the defendants, who are expected to be first brought to and arrested in the Southern District of New York, and whose port of entry is expected to be the Southern District of New York, and other known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Sections 1956(a)(2) and 1956(a)(3).

6. It was a part and an object of the conspiracy that JEREMIAS JIMENEZ CRUZ and JESSIKA FUENTES SANCHEZ, the defendants, and others known and unknown, would and did transport, transmit, and transfer, and attempt 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 unlawful importation into the United States of controlled substances, in violation of Title 21, United States Code, Sections 952(a) and 959(a), in violation of Title 18, United States Code, Section 1956(a)(2)(A).

7. It was a further part and an object of the conspiracy that JEREMIAS JIMENEZ CRUZ and JESSIKA FUENTES SANCHEZ, the defendants, and others known and unknown, would and did

transport, transmit, and transfer, and attempt 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, knowing that the monetary instrument and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership and the control of the proceeds of specified unlawful activity, to wit, the unlawful importation into the United States of controlled substances, in violation of Title 21, United States Code, Sections 952(a) and 959(a), in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i).

8. It was a further part and an object of the conspiracy that JEREMIAS JIMENEZ CRUZ and JESSIKA FUENTES SANCHEZ, the defendants, and others known and unknown, with the intent to (a) promote the carrying on of specified unlawful activity, and (b) conceal and disguise the nature, location, source, ownership, and control of property believed to be the proceeds of specified unlawful activity, would and did conduct and attempt to conduct financial transactions involving property represented to be the proceeds of that specified unlawful activity, and property used

to conduct and facilitate that specified unlawful activity, to wit, JIMENEZ CRUZ and FUENTES SANCHEZ transferred approximately \$100,000, which was represented to JIMENEZ CRUZ and FUENTES SANCHEZ to be the proceeds of narcotics trafficking, from New York, New York to Colombia, in violation of Title 18, United States Code, Section 1956(3).

(Title 18, United States Code, Sections 1956(a)(2), 1956(a)(3), 1956(h), and 3238.)

FORFEITURE ALLEGATIONS

9. As a result of committing the offense alleged in Count One of this Indictment, JEREMIAS JIMENEZ CRUZ and JESSIKA FUENTES SANCHEZ, the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

10. As a result of committing the offense alleged in Count Two of this Indictment, JEREMIAS JIMENEZ CRUZ and JESSIKA FUENTES SANCHEZ, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section

982(a)(1), any and all property, real and personal, involved in said offense, or 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.

Substitute Asset Provision

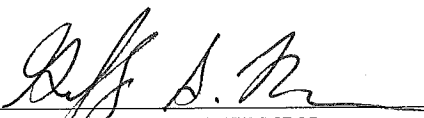
11. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- 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;

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 defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982;
United States Code, Section 853; and
United States Code, Section 2461.)

FOREPERSON


GEOFFREY S. BERMAN
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

JEREMIAS JIMENEZ CRUZ and JESSIKA
FUENTES SANCHEZ,

Defendants.

INDICTMENT

19 Cr.

(18 U.S.C. §§ 1956(a)(2), 1956(a)(3),
1956(h), & 3230; 21 U.S.C. §§ 952(a),
959(a), 959(d), 960(2),
960(b)(1)(B)(ii), & 963.)

GEOFFREY S. BERMAN _____

