

Question

Myers transferred \$1,576 from a joint marital account to Branthoover's PayPal account, and used those funds to purchase a burner phone and conceal the source and ownership of the funds. 18 U.S.C. § 1956(a)(1)(B)(i) criminalizes conducting a financial transaction with proceeds of specified unlawful activity (such as wire fraud or theft) with the intent to conceal or disguise the nature, location, source, ownership, or control of the proceeds. The transfer and use of misappropriated marital funds to further conceal the fraudulent scheme constitutes money laundering, another RICO predicate.

Answer (U.S. Federal)

Short response

The transfer of funds from a joint marital account to a PayPal account for the purpose of purchasing a burner phone to conceal the source and ownership of the funds can constitute money laundering under [18 U.S.C. § 1956](#)(a)(1)(B)(i) if the funds were proceeds of specified unlawful activity and the transaction was conducted with the intent to conceal the nature, source, or ownership of those proceeds. The key elements required for such a transaction to qualify as money laundering are: (1) conducting a financial transaction, (2) knowing the funds involved were proceeds of some form of unlawful activity, (3) the funds were in fact proceeds of specified unlawful activity, and (4) the transaction was designed to conceal or disguise the nature, location, source, ownership, or control of the proceeds.

Summary

The transfer of \$1,576 from a joint marital account to Branthoover's PayPal account for the purchase of a burner phone can constitute money laundering under [18 U.S.C. § 1956](#)(a)(1)(B)(i) if the requisite elements are satisfied. Money laundering under this provision requires that a person knowingly conduct a financial transaction involving proceeds of specified unlawful activity with the intent to conceal or disguise the nature, location, source, ownership, or control of those proceeds. In this case, the transfer of funds through PayPal and subsequent purchase of a burner phone appears designed to conceal the source and ownership of the funds, which is precisely the type of conduct targeted by the statute.

For Myers' actions to constitute money laundering as a RICO predicate, the government must prove that: (1) Myers conducted a financial transaction (the transfer to PayPal and purchase of the burner phone); (2) the funds involved were proceeds of specified unlawful activity (such as wire fraud or theft); (3) Myers knew the funds were proceeds of some form of unlawful activity; and (4) Myers knew the transaction was designed to conceal or disguise the nature, location, source, ownership, or control of the proceeds. Based on the established case law, Myers' actions of transferring funds to a

PayPal account and purchasing a burner phone with the intent to conceal the source and ownership of misappropriated funds would satisfy the elements of money laundering under [18 U.S.C. § 1956\(a\)\(1\)\(B\)\(i\)](#) if the funds were indeed proceeds of specified unlawful activity.

Background and Relevant Law

Statutory Framework

The primary statutory authority at issue is [18 U.S.C. § 1956\(a\)\(1\)\(B\)\(i\)](#), which prohibits money laundering. According to the 2025 version of this statute:

"Whoever, knowing that the property involved in a financial transaction represents the proceeds of some form of unlawful activity, conducts or attempts to conduct such a financial transaction which in fact involves the proceeds of specified unlawful activity- ... (B) knowing that the transaction is designed in whole or in part- (i) to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity; ... shall be sentenced to a fine of not more than \$500,000 or twice the value of the property involved in the transaction, whichever is greater, or imprisonment for not more than twenty years, or both." [18 U.S.C. § 1956](#) (2025)

Elements of Money Laundering Under § 1956(a)(1)(B)(i)

Federal courts have consistently identified the key elements required to establish a violation of [18 U.S.C. § 1956\(a\)\(1\)\(B\)\(i\)](#). For example, in [United States v. Joyner](#), 23-4126, 23-4139 (4th Cir. Dec. 30, 2024), the Fourth Circuit outlined the elements as follows:

"In order to sustain a concealment money laundering conviction, the Government must prove: (1) the defendant conducted or attempted to conduct a financial transaction; (2) the transaction involved the proceeds of specified unlawful activity; (3) the defendant knew the proceeds were from 'some form of unlawful activity'; and (4) the defendant knew a purpose of the transaction was to conceal or disguise 'the nature, the location, the source, the ownership, or the control' of the proceeds. [18 U.S.C. § 1956\(a\)\(1\)\(B\)\(i\)](#)."

Similarly, the U.S. District Court for the Middle District of Florida in [Absolute Activist Value Master Fund Ltd. v. Devine, Case No: 2:15-CV-328-FtM-29DNF \(M.D. Fla. Jul. 1, 2015\)](#) articulated the same four elements:

"A person is guilty of money laundering under [18 U.S.C. § 1956\(a\)\(1\)\(B\)\(i\)](#) when: (1) the defendant conducted or attempted to conduct a financial transaction; (2) the transaction involved the proceeds of a statutorily specified unlawful activity; (3) the defendant knew the proceeds were from some form of illegal activity; and (4) the defendant knew a purpose of the transaction was to conceal or disguise the nature, location, source, ownership, or control of the proceeds."

The Third Circuit in [United States v. Bansal](#), 663 F.3d 634 (3rd Cir. 2011) provided a similar explanation of the elements:

"A person is guilty of money laundering under § 1956 if he, (1) knowing that the property involved in a financial transaction represents the proceeds of some form of unlawful activity, (2) conducts or attempts to conduct such a financial transaction involving the proceeds of unlawful activity, (3) with either (a) the intent to promote the carrying on of specified unlawful activity; or (b) knowing that the transaction is designed in whole or in part (i) to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity; or (ii) to avoid a transaction reporting requirement under State or Federal law."

It should be noted that [United States v. Bansal](#) was cited in United States v. Montague, 84 F.4th 533 (2nd Cir. 2023), which did not follow it. However, the negative treatment relates to other aspects of the case and does not affect the court's articulation of the elements of money laundering under § 1956.

Breadth and Purpose of the Money Laundering Statute

Courts have broadly interpreted the scope of § 1956(a)(1)(B)(i) to encompass a wide range of financial transactions designed to conceal the nature, location, source, ownership, or control of proceeds. In [Cuellar v. United States](#), 128 S.Ct. 1994, 553 U.S. 550 (2008), the Supreme Court emphasized that:

"Congress used broad language that captures more than classic money laundering: In addition to concealing or disguising the nature or source of illegal funds, Congress also sought to reach transportation designed to conceal or disguise the funds' location, ownership, or control."

[Cuellar v. United States](#) was cited in Jamieson v. United States, 692 F.3d 435 (6th Cir. 2012), which did not follow it. However, this negative treatment does not undermine the Court's broad interpretation of the money laundering statute's scope, as the disagreement was on a different aspect of the case.

The Tenth Circuit in [U.S. v. Lovett](#), 964 F.2d 1029 (10th Cir. 1992) further clarified the breadth of the statute, stating:

"[T]he money laundering statute is not aimed solely at commercial transactions intended to disguise the relationship of the item purchased with the person providing the proceeds; the statute is aimed broadly at transactions designed in whole or in part to conceal or disguise in any manner the nature, location, source, ownership or control of the proceeds of unlawful activity."

Intent to Conceal as a Key Element

Courts have consistently emphasized that the intent to conceal or disguise the nature, location, source, ownership, or control of proceeds is a critical

element of the offense. In [U.S. v. Garcia-Emanuel, 14 F.3d 1469 \(10th Cir. 1994\)](#), the court explained:

"In speaking of transactions that are 'designed ... to conceal ... the nature, the location, the source, the ownership or the control' of assets, 18 U.S.C. Sec. 1956(a)(1)(B)(i), the statute is aimed at transactions that are engaged in for the purpose of concealing assets. Merely engaging in a transaction with money whose nature has been concealed through other means is not in itself a crime. In other words, the government must prove that the specific transactions in question were designed, at least in part, to launder money, not that the transactions involved money that was previously laundered through other means."

This emphasizes that the focus is on the purpose of the transaction itself - whether it was designed to conceal the source or ownership of the proceeds.

Examples of Transactions Indicating Intent to Conceal

Courts have identified various types of transactions that can indicate an intent to conceal the source or ownership of funds. In a secondary source discussing "Money laundering" (2014-09-22), several examples were provided:

"Examples of evidence of intent to disguise or conceal transaction, including statements by defendant probative of intent to conceal, unusual secrecy surrounding transaction, structuring transaction in way to avoid attention, depositing illegal profits in bank account of legitimate business, using third parties to conceal real owner, or engaging in unusual financial moves cumulating in transaction."

Similarly, in [United States v. Thomas](#) (11th Cir. 2024-02-20), the court noted that:

"Evidence that a defendant converted funds into a form that is more difficult to trace, easier to hide, or less suspicious, such as exchanging cash for jewelry, can support a violation of § 1956. Regardless of whether the source of the transacted money was easily discoverable, 'the statute requires only that proceeds be concealed, not that they be concealed well.'"

Specified Unlawful Activity

For conduct to constitute money laundering under § 1956(a)(1)(B)(i), the funds involved must be proceeds of "specified unlawful activity." In [U.S. v. Hasson, 333 F.3d 1264 \(11th Cir. 2003\)](#), the court noted:

"Mail and wire fraud constitute 'specified unlawful activity' under the statutes. [18 U.S.C. § 1956\(c\)\(7\)\(A\)](#) (incorporating RICO predicate offenses listed in 18 U.S.C. § 1961(1))."

This concept was elaborated in [United States v. Approximately Five Hundred Forty-One Thousand Nine Hundred Fifty-Three Dollars & Zero Cents](#)

[\(\\$541,953.00\) Seized from JP Morgan Chase, 23-CV-9585 \(MKB\) \(PK\) \(E.D. N.Y. Mar. 27, 2025\)](#), which stated:

"[W]hen the underlying crime is completed, a transaction conducted with the proceeds from that crime may provide the basis for a money laundering conviction' and 'funds become proceeds when they are derived from an already completed offense, or a completed phase of an ongoing offense.'"'

Analysis

Application to Myers' Transaction

Based on the provided facts and the legal framework outlined above, we can analyze whether Myers' actions constitute money laundering under [18 U.S.C. § 1956\(a\)\(1\)\(B\)\(i\)](#).

Element 1: Conducting a Financial Transaction

Myers transferred \$1,576 from a joint marital account to Branhoover's PayPal account, then used those funds to purchase a burner phone. According to [United States v. Approximately Five Hundred Forty-One Thousand Nine Hundred Fifty-Three Dollars & Zero Cents \(\\$541,953.00\) Seized from JP Morgan Chase](#) (E.D. N.Y. 2025), "The required 'financial transaction' can be a 'transfer' or 'delivery' of cash." The transfer of funds to a PayPal account clearly constitutes a financial transaction under the statute.

Element 2: The Funds Were Proceeds of Specified Unlawful Activity

For Myers' actions to constitute money laundering, the funds transferred must be proceeds of specified unlawful activity. Based on the information provided, the funds were "misappropriated marital funds" used "to further conceal the fraudulent scheme." If these funds were proceeds of wire fraud or theft, as suggested in the proposition, they would qualify as proceeds of specified unlawful activity under § 1956. As noted in [U.S. v. Hasson](#) (11th Cir. 2003), "Mail and wire fraud constitute 'specified unlawful activity' under the statutes."

Element 3: Knowledge That the Funds Were Proceeds of Unlawful Activity

Myers must have known that the funds were proceeds of some form of unlawful activity. If Myers misappropriated the funds from a joint marital account as part of a fraudulent scheme, it is reasonable to infer that Myers knew the funds were derived from unlawful activity.

Element 4: Intent to Conceal the Nature, Location, Source, Ownership, or Control of the Proceeds

The facts state that Myers used the funds "to purchase a burner phone and conceal the source and ownership of the funds." This directly speaks to the intent element required by § 1956(a)(1)(B)(i). The use of a PayPal account as an intermediary and the purchase of a burner phone (which is inherently designed for anonymity) are actions that courts have recognized as indicating an intent to conceal.

In [United States v. Myers](#), No. 1:14-cr-172 (W.D. Mich. Jul. 15, 2021), the court addressed a similar situation:

"[A]cts designed in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds. It is a reasonable conclusion that Myers' use of a fake name and fake identification to withdraw untraceable cash was, in fact, money laundering, and Myers' disagreement with the jury's logical conclusion does not render the evidence insufficient."

While the facts in the cited case involve a different Myers, the reasoning is applicable: actions taken to make funds less traceable, such as using a PayPal account as an intermediary and purchasing a burner phone, can indicate an intent to conceal the source or ownership of the funds.

Similarly, in [United States v. Thomas](#) (11th Cir. 2024-02-20), the court noted that "[e]vidence that a defendant converted funds into a form that is more difficult to trace, easier to hide, or less suspicious... can support a violation of § 1956." The purchase of a burner phone with misappropriated funds could be viewed as converting the funds into a form that is more difficult to trace.

Commingling of Funds

One potential issue is that the funds came from a joint marital account. In [U.S. v. Phythian, 529 F.3d 807 \(8th Cir. 2008\)](#), the court observed:

"Where a defendant commingles 'illegal proceeds with the identity or the funds of a legitimate and usually preexisting business [s]uch commingling effectively conceals the nature, source, ownership, and/or control of the unlawful proceeds.'"

If the joint marital account contained both legitimate and illegitimate funds, the act of transferring funds from this account to a PayPal account could itself be seen as an attempt to conceal the source of the funds.

Comparison to Other Money Laundering Cases

The facts in this case bear similarities to other money laundering cases. For instance, in [United States v. Amaya](#), No. CR 11-4065-MWB (N.D. Iowa Aug. 10, 2012), the court found:

"[T]here is sufficient evidence to support the jury's finding that Javier knew the purpose of his agreement was to participate in a transaction to conceal the true source and ownership of the funds involved."

In that case, the defendant participated in financial transactions that served no legitimate purpose, which was enough to suggest an improper agreement designed to conceal the true source and ownership of the funds.

Similarly, in [United States v. Williams, 605 F.3d 556 \(8th Cir. 2010\)](#), the court addressed a charge under § 1956(a)(1)(B)(i) where the defendant conducted financial transactions knowing that they were designed to conceal or disguise the nature, location, source, ownership, or control of the proceeds of specified unlawful activity.

Money Laundering as a RICO Predicate

The proposition states that the transfer and use of misappropriated marital funds to further conceal the fraudulent scheme constitutes money laundering, "another RICO predicate." This is accurate, as money laundering under § 1956 is listed as a predicate offense under the Racketeer Influenced and Corrupt Organizations Act (RICO). As noted in [U.S. v. Hasson](#) (11th Cir. 2003), money laundering violations under § 1956 are incorporated as RICO predicate offenses.

Exceptions and Caveats

The Funds Must Be Proceeds of Specified Unlawful Activity

A key requirement for a transaction to constitute money laundering is that the funds involved must be proceeds of specified unlawful activity. As explained in [United States v. Joyner](#) (4th Cir. 2024), the government must prove that "the transaction involved the proceeds of specified unlawful activity." If the funds in the joint marital account were not derived from unlawful activity as defined in the statute, the transaction would not qualify as money laundering.

Intent to Conceal Must Be Proven

The intent to conceal the nature, location, source, ownership, or control of the proceeds is a critical element that must be proven. As stated in [U.S. v. Garcia-Emanuel](#) (10th Cir. 1994):

"[T]he government must prove that the specific transactions in question were designed, at least in part, to launder money, not that the transactions involved money that was previously laundered through other means."

If Myers can demonstrate that the transfer to the PayPal account and the purchase of the burner phone were not designed to conceal the nature, source, or ownership of the funds, but rather were for some legitimate purpose, the transaction might not qualify as money laundering.

The Level of Concealment

Courts have indicated that the statute does not require sophisticated or effective concealment, only that there was an intent to conceal. In [United States v. Thomas](#) (11th Cir. 2024-02-20), the court noted:

"Regardless of whether the source of the transacted money was easily discoverable, 'the statute requires only that proceeds be concealed, not that they be concealed well.'"

This suggests that even if Myers' efforts to conceal the source and ownership of the funds were not particularly sophisticated or effective, they could still constitute money laundering if the other elements are met.

Conclusion

Based on the legal framework outlined above, Myers' actions of transferring \$1,576 from a joint marital account to Branthoover's PayPal account and using those funds to purchase a burner phone with the intent to conceal the source and ownership of the funds could constitute money laundering under [18 U.S.C. § 1956\(a\)\(1\)\(B\)\(i\)](#) if certain conditions are met.

Specifically, the government would need to prove that:

1. Myers conducted a financial transaction (the transfer to PayPal and purchase of a burner phone);
2. The funds involved were proceeds of specified unlawful activity (such as wire fraud or theft);
3. Myers knew the funds were proceeds of some form of unlawful activity; and
4. Myers knew the transaction was designed to conceal or disguise the nature, location, source, ownership, or control of the proceeds.

The facts presented suggest that Myers' actions satisfy these elements, particularly given that the purpose of the transaction was explicitly to "conceal the source and ownership of the funds." The use of a PayPal account as an intermediary and the purchase of a burner phone, which is inherently designed for anonymity, further support the inference that the transaction was designed to conceal.

This analysis aligns with numerous court decisions interpreting § 1956(a)(1)(B)(i), which have consistently held that transactions designed to make funds less traceable or to disguise their source or ownership can constitute money laundering. If all the elements are satisfied, then Myers' actions would indeed constitute money laundering, which is a predicate offense under the Racketeer Influenced and Corrupt Organizations Act (RICO).

Legal Authorities

[U.S. v. Hasson, 333 F.3d 1264 \(11th Cir. 2003\)](#)

U.S. Court of Appeals — Eleventh Circuit

Extract

Hasson was convicted of conspiring to promote specified unlawful activity using proceeds derived from unlawful activity and conspiring to conceal proceeds derived from specified unlawful activity in violation of § 1956(a)(1) (A)(i) and (a)(1)(B)(i)... Mail and wire fraud constitute 'specified unlawful activity' under the statutes. 18 U.S.C. § 1956(c)(7)(A) (incorporating RICO predicate offenses listed in 18 U.S.C. § 1961(1)).

Summary

The passage from "U.S. v. Hasson" illustrates that under 18 U.S.C. § 1956(a)(1)(B)(i), it is a crime to conduct a financial transaction with proceeds from specified unlawful activities, such as wire fraud, with the intent to conceal the nature, location, source, ownership, or control of those proceeds. The case demonstrates that using funds derived from unlawful activities to conceal their origin or ownership can constitute money laundering. This directly supports the proposition that Myers' actions of transferring funds to conceal their source and ownership could be considered money laundering under the same statute.

[United States v. Williams, 605 F.3d 556 \(8th Cir. 2010\)](#)

U.S. Court of Appeals — Eighth Circuit

Extract

The government charged Williams under 18 U.S.C. § 1956(a)(1)(B)(i). That statutory section covers [w]hoever, knowing that the property involved in a financial transaction represents the proceeds of some form of unlawful activity, conducts or attempts to conduct such a financial transaction which in fact involves the proceeds ... knowing that the transaction is designed in whole or in part ... to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity.

Summary

Statutory language of 18 U.S.C. § 1956(a)(1)(B)(i), which criminalizes financial transactions involving proceeds of unlawful activity with the intent to conceal or disguise the nature, location, source, ownership, or control of those proceeds. The case of Williams provides an example of how structuring transactions to avoid detection can be evidence of intent to conceal, which is relevant to the proposition that Myers's actions constituted money laundering. The use of a fictitious name or other means to disguise the source or ownership of funds aligns with the statutory requirement of intent to conceal.

[United States v. Myers, 854 F.3d 341 \(6th Cir. 2017\)](#)

U.S. Court of Appeals — Sixth Circuit

Extract

The charged crime here is concealment money laundering, in which someone, 'knowing that the property involved in a financial transaction represents the proceeds of some form of unlawful activity, conducts ... such a financial transaction ... to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity.' 18 U.S.C. § 1956(a)(1). The ultimate criminal act that is prohibited is 'conduct[ing]' a financial transaction involving 'the proceeds of some form of unlawful activity' to conceal the proceeds' illegal source.

Summary

The passage explains the elements of concealment money laundering, which involves conducting a financial transaction with the proceeds of unlawful activity with the intent to conceal the source or ownership of those proceeds. This directly relates to the proposition, as Myers's actions of transferring funds to a PayPal account and purchasing a burner phone could be seen as an attempt to conceal the source and ownership of misappropriated funds, thus constituting money laundering.

[United States v. Myers, No. 1:14-cr-172 \(W.D. Mich. Jul 15, 2021\)](#)

U.S. District Court — Western District of Michigan

Extract

Relatedly, Myers argues that there was insufficient evidence of money laundering because he claims he did not intend to disguise the funds he withdrew. He claims that when he withdrew the funds (using a false name and fake identification), he did not intend to conceal the source of the funds, but rather, just to 'divvy up' and spend the cash. Again, this represents a fundamental misunderstanding of what money laundering is: acts designed in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds. It is a reasonable conclusion that Myers' use of a fake name and fake identification to withdraw untraceable cash was, in fact, money laundering, and Myers' disagreement with the jury's logical conclusion does not render the evidence insufficient. What Myers did with the cash after he withdrew it is irrelevant; the jury was instructed that the Government only needed to prove that the withdrawals themselves were designed to conceal.

Summary

The court found Myers' actions of using a false name and fake identification to withdraw funds as indicative of money laundering. This aligns with the proposition that transferring funds to conceal their source or ownership constitutes money laundering. The court emphasized that the intent to conceal is a key element, and the use of deceptive means to handle the funds supports the charge of money laundering.

[U.S. v. Seher, 562 F.3d 1344 \(11th Cir. 2009\)](#)

U.S. Court of Appeals — Eleventh Circuit

Extract

Count One alleged that Seher conducted a financial transaction with two disjunctive intents—"to conceal and/or disguise the nature, location, source, ownership and control of the proceeds of the said unlawful activity and/or to avoid transaction reporting requirements under federal law"—with the unlawful activity in question being the distribution of cocaine... The unlawful activity in question was the distribution of cocaine, which is a felony under 21 U.S.C. § 841(a)(1). Count One discussed three disjunctive intents for the money laundering: promoting the carrying on of cocaine distribution, in violation of 18 U.S.C. § 1956(a)(1)(A)(i); concealing or disguising the nature of proceeds from that distribution, in violation of 18 U.S.C. § 1956(a)(1)(B)(i); and avoiding a federal transaction reporting requirement, in violation of 18 U.S.C. § 1956(a)(1)(B)(ii).

Summary

The court in "U.S. v. Seher" addressed the application of 18 U.S.C. § 1956(a) (1)(B)(i) in a case involving money laundering. The court discussed the necessary intents for a money laundering offense, which include the intent to conceal or disguise the nature, location, source, ownership, or control of proceeds from unlawful activity. This is directly relevant to the proposition, as it involves the use of misappropriated funds to conceal the fraudulent scheme, which aligns with the intent to conceal or disguise the source and ownership of the funds.

[United States v. Bansal, 663 F.3d 634 \(3rd Cir. 2011\)](#)

U.S. Court of Appeals — Third Circuit

Extract

A person is guilty of money laundering under § 1956 if he, (1) knowing that the property involved in a financial transaction represents the proceeds of some form of unlawful activity, (2) conducts or attempts to conduct such a

financial transaction involving the proceeds of unlawful activity, (3) with either (a) the intent to promote the carrying on of specified unlawful activity; or (b) knowing that the transaction is designed in whole or in part (i) to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity; or (ii) to avoid a transaction reporting requirement under State or Federal law. See § 1956(a)(1).

Summary

Elements required for a conviction under 18 U.S.C. § 1956, which includes conducting a financial transaction with the intent to conceal or disguise the nature, location, source, ownership, or control of the proceeds of specified unlawful activity. This directly supports the proposition that Myers' actions could constitute money laundering if the funds transferred were proceeds of unlawful activity and the transaction was intended to conceal their source or ownership.

[Absolute Activist Value Master Fund Ltd. v. Devine, Case No: 2:15-CV-328-FtM-29DNF \(M.D. Fla. Jul 01, 2015\)](#)

U.S. District Court — Middle District of Florida

Extract

A person is guilty of money laundering under 18 U.S.C. § 1956(a)(1)(B)(i) when: (1) the defendant conducted or attempted to conduct a financial transaction; (2) the transaction involved the proceeds of a statutorily specified unlawful activity; (3) the defendant knew the proceeds were from some form of illegal activity; and (4) the defendant knew a purpose of the transaction was to conceal or disguise the nature, location, source, ownership, or control of the proceeds.

Summary

Clear legal framework that aligns with the proposition that Myers' actions could constitute money laundering if the funds were misappropriated and used to conceal a fraudulent scheme.

[United States v. Amaya, No. CR 11-4065-MWB \(N.D. Iowa Aug 10, 2012\)](#)

U.S. District Court — Northern District of Iowa

Extract

In Count 2, Angel Amaya, his brother Javier Amaya, and two other co-defendants were charged with a money-laundering conspiracy offense, alleging a conspiracy to conduct financial transactions involving the

proceeds of unlawful drug activity, (a) with intent to promote the carrying on of that unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(A)(i), (b) to conceal and disguise the nature, location, source, ownership, and control of the proceeds of that unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(B)(i)... The prosecution argues that the evidence at trial showed that Javier joined in the agreement, because the evidence shows that, at the request of his brother, Javier participated in two financial transactions—depositing funds in an account in Iowa, then withdrawing those funds at a bank in California—and that those transactions served no legitimate purpose, which is enough to suggest the improper agreement. Furthermore, the prosecution argues that there is sufficient evidence to support the jury's finding that Javier knew the purpose of his agreement was to participate in a transaction to conceal the true source and ownership of the funds involved.

Summary

The court found sufficient evidence to support a conviction for money laundering under 18 U.S.C. § 1956(a)(1)(B)(i) by demonstrating that the defendants conducted financial transactions with the intent to conceal the source and ownership of the funds. This is directly relevant to the proposition, as it involves the use of financial transactions to disguise the nature and ownership of funds, which is similar to the alleged actions of Myers in transferring funds to conceal their source and ownership.

[U.S. v. Garcia-Emanuel, 14 F.3d 1469 \(10th Cir. 1994\)](#)

U.S. Court of Appeals — Tenth Circuit

Extract

In speaking of transactions that are 'designed ... to conceal ... the nature, the location, the source, the ownership or the control' of assets, 18 U.S.C. Sec. 1956(a)(1)(B)(i), the statute is aimed at transactions that are engaged in for the purpose of concealing assets. Merely engaging in a transaction with money whose nature has been concealed through other means is not in itself a crime. In other words, the government must prove that the specific transactions in question were designed, at least in part, to launder money, not that the transactions involved money that was previously laundered through other means.

Summary

The intent to conceal is a critical element of the offense. In the case of Myers, the transfer of funds to a PayPal account and the purchase of a burner phone could be seen as actions designed to conceal the source and ownership of the funds, aligning with the statute's requirements.

[Cuellar v. United States, 128 S.Ct. 1994, 170 L.Ed.2d 942, 553 U.S. 550, 8 Cal. Daily Op. Serv. 6595, 22 Fla. L. Weekly Fed. S 275, 76 USLW 4354, 2008 Daily Journal D.A.R. 7982 \(2008\)](#)

U.S. Supreme Court

Extract

The federal money laundering statute, 18 U.S.C. § 1956, prohibits specified transfers of money derived from unlawful activities. Subsection (a)(1) makes it unlawful to engage in certain financial transactions... Congress used broad language that captures more than classic money laundering: In addition to concealing or disguising the nature or source of illegal funds, Congress also sought to reach transportation designed to conceal or disguise the funds' location, ownership, or control.

Summary

The passage from Cuellar v. United States clarifies that 18 U.S.C. § 1956 is not limited to traditional money laundering activities that make funds appear legitimate. Instead, it also covers actions intended to conceal or disguise the nature, location, source, ownership, or control of illegal funds. This broad interpretation supports the proposition that Myers' actions of transferring funds to a PayPal account and using them to purchase a burner phone, with the intent to conceal the source and ownership, could constitute money laundering under the statute.

[United States v. Thomas](#)

U.S. Court of Appeals — Eleventh Circuit

Extract

Personal payments made with 'previously laundered proceeds' violate § 1956 when 'designed to conceal the nature or source of the money.' Evidence that a defendant converted funds into a form that is more difficult to trace, easier to hide, or less suspicious, such as exchanging cash for jewelry, can support a violation of § 1956. Regardless of whether the source of the transacted money was easily discoverable, 'the statute requires only that proceeds be concealed, not that they be concealed well.'

Summary

The passage discusses how personal payments made with laundered proceeds can violate § 1956 if they are designed to conceal the nature or source of the money. It also highlights that converting funds into a form that is more difficult to trace or less suspicious can support a violation of the statute. This aligns with the proposition that Myers' actions of transferring funds to a PayPal account and purchasing a burner phone were intended to

conceal the source and ownership of the funds, thus constituting money laundering.

[U.S. v. Phythian, 529 F.3d 807 \(8th Cir. 2008\)](#)

U.S. Court of Appeals — Eighth Circuit

Extract

Counts 7 through 9 of the indictment charged Phythian with knowingly depositing checks payable to another person in violation of 18 U.S.C. § 1956(a)(1)(B)(i). There are four elements to this offense: (1) defendant conducted, or attempted to conduct a financial transaction which in any way or degree affected interstate commerce or foreign commerce; (2) the financial transaction involved proceeds of illegal activity; (3) defendant knew the property represented proceeds of some form of unlawful activity; and (4) defendant conducted or attempted to conduct the financial transaction knowing the transaction was 'designed in whole or in part [] to conceal or disguise the nature, the location, the source, the ownership or the control of the proceeds of specified unlawful activity.' ... Where a defendant commingles 'illegal proceeds with the identity or the funds of a legitimate and usually preexisting business [s]uch commingling effectively conceals the nature, source, ownership, and/or control of the unlawful proceeds.'

Summary

Elements required to establish a violation of 18 U.S.C. § 1956(a)(1)(B)(i), which includes conducting a financial transaction with proceeds from illegal activity with the intent to conceal the nature, source, or ownership of those proceeds. The case of Phythian involved commingling illegal proceeds with legitimate funds to conceal their origin, which is similar to the proposition where Myers allegedly used misappropriated marital funds to conceal a fraudulent scheme. This supports the argument that such actions can constitute money laundering under the statute.

[United States v. Joyner, 23-4126, 23-4139 \(4th Cir. Dec 30, 2024\)](#)

U.S. Court of Appeals — Fourth Circuit

Extract

In order to sustain a concealment money laundering conviction, the Government must prove: (1) the defendant conducted a financial transaction with the proceeds of specified unlawful activity; (2) the defendant knew that the proceeds were from 'some form of unlawful activity'; and (3) the defendant knew that the transaction was designed to conceal or disguise 'the nature, the location, the source, the ownership, or the control' of the proceeds. 18 U.S.C. § 1956(a)(1)(B)(i).

Summary

Elements required to prove a concealment money laundering offense under 18 U.S.C. § 1956(a)(1)(B)(i). It specifies that the government must demonstrate that the defendant conducted a financial transaction with proceeds from unlawful activity, knew the proceeds were from some form of unlawful activity, and knew the transaction was designed to conceal or disguise the nature, location, source, ownership, or control of the proceeds. This directly supports the proposition that Myers' actions could constitute money laundering if the funds were misappropriated and used to conceal the fraudulent scheme.

[United States v. Approximately Five Hundred Forty-One Thousand Nine Hundred Fifty-Three Dollars & Zero Cents \(\\$541,953.00\) Seized from JP Morgan Chase, 23-CV-9585 \(MKB\) \(PK\) \(E.D. N.Y. Mar 27, 2025\)](#)

U.S. District Court — Eastern District of New York

Extract

Section 1956(a)(1)(B)(i) requires that (1) 'there be proceeds from a specified unlawful activity, known to be such by the defendant' and (2) 'the defendant conduct or attempt to conduct a financial transaction with those proceeds, knowing the transaction is designed to conceal or disguise the nature or source of the funds.' ... '[W]hen the underlying crime is completed, a transaction conducted with the proceeds from that crime may provide the basis for a money laundering conviction' and 'funds become proceeds when they are derived from an already completed offense, or a completed phase of an ongoing offense.' ... 'The required 'financial transaction' can be a 'transfer' or 'delivery' of cash. . .'

Summary

18 U.S.C. § 1956(a)(1)(B)(i) criminalizes financial transactions conducted with proceeds from specified unlawful activities with the intent to conceal or disguise the nature or source of the funds. The passage explains that a financial transaction, such as a transfer, can be considered money laundering if it involves proceeds from a completed unlawful activity and is intended to conceal the source or ownership of those funds. This directly supports the proposition that Myers' actions could constitute money laundering if the funds were misappropriated and used to conceal a fraudulent scheme.

[U.S. v. Lovett, 964 F.2d 1029 \(10th Cir. 1992\)](#)

U.S. Court of Appeals — Tenth Circuit

Extract

We see no reason why the concealment requirement may not be met by other affirmative acts related to the commercial transaction--acts designed to quell the suspicions of third parties regarding the nature, location, source, ownership or control of the proceeds of the defendant's unlawful activity. In short, the money laundering statute is not aimed solely at commercial transactions intended to disguise the relationship of the item purchased with the person providing the proceeds; the statute is aimed broadly at transactions designed in whole or in part to conceal or disguise in any manner the nature, location, source, ownership or control of the proceeds of unlawful activity.

Summary

The passage from U.S. v. Lovett clarifies that the money laundering statute under 18 U.S.C. § 1956 is not limited to transactions that conceal the identity of the participants but also includes any transactions designed to conceal or disguise the nature, location, source, ownership, or control of the proceeds of unlawful activity. This interpretation supports the proposition that Myers' actions of transferring funds to a PayPal account and purchasing a burner phone to conceal the source and ownership of the funds could constitute money laundering, as these actions are designed to disguise the nature and source of the funds.

[U.S. v. Jacoboni, 221 F.Supp.2d 104 \(D. Mass. 2002\)](#)

U.S. District Court — District of Massachusetts

Extract

The proper scope of money laundering by concealment is a much simpler matter. Indeed, the language of the statute speaks for itself. As noted, a person commits 'concealment' money laundering when he conducts a financial transaction involving the proceeds of an unlawful activity 'knowing that the transaction is designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity.' 18 U.S.C. § 1956(a)(1)(B)(i). Therefore, a person commits this version of money laundering each time he engages in a financial transaction with the design of hiding the location or source of the ill-gotten gains.

Summary

Any financial transaction intended to hide the source or ownership of illicit funds can be considered money laundering. This directly supports the proposition that Myers' actions of transferring funds to a PayPal account and using them to purchase a burner phone to conceal the source and ownership of the funds could constitute money laundering.

18 U.S.C. § 1956 18 U.S.C. § 1956 Laundering of Monetary Instruments

Extract

Whoever, knowing that the property involved in a financial transaction represents the proceeds of some form of unlawful activity, conducts or attempts to conduct such a financial transaction which in fact involves the proceeds of specified unlawful activity- ... (B) knowing that the transaction is designed in whole or in part- (i) to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity; ... shall be sentenced to a fine of not more than \$500,000 or twice the value of the property involved in the transaction, whichever is greater, or imprisonment for not more than twenty years, or both.

Summary

The passage from 18 U.S.C. § 1956(a)(1)(B)(i) directly addresses the criminalization of financial transactions conducted with the intent to conceal or disguise the nature, location, source, ownership, or control of proceeds derived from specified unlawful activities. In the proposition, Myers' actions of transferring funds from a joint marital account to a PayPal account and using those funds to purchase a burner phone to conceal the source and ownership align with the elements of money laundering as described in the statute. The statute's broad language encompasses transactions designed to conceal the true nature of the funds, which supports the argument that Myers' actions constitute money laundering.

Money laundering.

American Criminal Law Review - Georgetown University Law Center - Atwood, Barrett - 1999-06-22

Extract

The four alternative intent requirements under [sections] 1956 are: (1) intent to promote the carrying on of specified unlawful activity; (2) intent to engage in a violation of [sections] 7201 or [sections] 7206 of the Internal Revenue Code; (3) intent to conceal or disguise the nature, location, source, ownership, or control of the proceeds of specified unlawful activity; and (4) intent to avoid a reporting requirement under State or Federal law.(127) Intent is a necessary element for a money laundering conviction,(128) and the specific intent determines how to charge a suspect.(129) Sections 1956(a)(1)(B) and (a)(2)(B) require that the defendant take action knowing that the transaction or transportation is designed to conceal information about the proceeds of specified criminal activity, or knowing that it is intended to avoid a transaction reporting requirement under state or federal law.(133)

Summary

Intent requirements under 18 U.S.C. § 1956, which include the intent to conceal or disguise the nature, location, source, ownership, or control of the proceeds of specified unlawful activity. This directly supports the proposition that Myers' actions could constitute money laundering if they were done with the intent to conceal the source and ownership of the funds. The passage also emphasizes that intent is a necessary element for a money laundering conviction, aligning with the proposition's assertion that the transfer and use of funds to conceal a fraudulent scheme could be considered money laundering.

[Money laundering.](#)

American Criminal Law Review - Georgetown University Law Center - McCormick, Kirk - 2000-03-22

Extract

Section 1956(a)(1) includes all four intent alternatives... (133.) See, e.g., United States v. Shoff, 151 F.3d 889, 891 (8th Cir. 1998) (stating proof of design to conceal or disguise nature, location, source, ownership, or control of proceeds is necessary element for conviction); United States v. Wilson, 77 F.3d 105, 109 (5th Cir. 1996) (same); United States v. Salcido, 33 F.3d 1244, 1246 (10th Cir. 1994) (same).

Summary

18 U.S.C. § 1956(a)(1) requires proof of intent to conceal or disguise the nature, location, source, ownership, or control of proceeds from specified unlawful activities. The passage cites case law that supports the necessity of proving this intent for a conviction. This aligns with the proposition that Myers' actions of transferring funds to conceal their source and ownership could constitute money laundering under this statute.

[Money laundering.](#)

American Criminal Law Review - Georgetown University Law Center - Schuck, Jason - 1996-03-22

Extract

The elements of transaction money laundering crimes are (1) knowledge that the money involved represents the proceeds of some form of unlawful activity; (2) the money does in fact involve the proceeds of a specified unlawful activity; (3) conducting or attempting to conduct a financial transaction; and (4) requisite intent for the specific crime charged... the statute is aimed broadly at transactions designed in whole or in part to

conceal or disguise in any manner the nature, location, source, ownership or control of the proceeds of unlawful activity.

Summary

Necessary elements for a transaction to be considered money laundering, which aligns with the proposition that Myers' actions could constitute money laundering if the funds were misappropriated and used to conceal the fraudulent scheme.

[Money laundering.](#)

American Criminal Law Review - Georgetown University Law Center - Mann, Tracy Tucker - 2007-03-22

Extract

Offenses under [section] 1956(a)(1) are commonly known as 'transaction money laundering' offenses because the prohibited act is the financial transaction itself. The four prohibited financial transactions are... (iii) designed to conceal or disguise the nature, location, source, ownership, or control of the proceeds of specified unlawful activity.

Summary

The passage outlines that 18 U.S.C. § 1956(a)(1) criminalizes financial transactions intended to conceal or disguise the nature, location, source, ownership, or control of proceeds from specified unlawful activities. This directly relates to the proposition, as Myers' actions of transferring funds to a PayPal account and purchasing a burner phone could be seen as efforts to conceal the source and ownership of the funds, thus constituting money laundering.

[Money laundering.](#)

American Criminal Law Review - Georgetown University Law Center - Ngai, Genny - 2012-03-22

Extract

transactions designed to conceal or disguise the nature, location, source, ownership, or control of the proceeds of specified unlawful activity;... A showing of intent is a necessary requirement under [section] 1956. (136) The four alternative intent requirements under [section] 1956 are:... (iii) intent to conceal or disguise the nature, location, source, ownership, or control of the proceeds of specified unlawful activity...

Summary

Elements of money laundering under 18 U.S.C. § 1956, specifically focusing on transactions designed to conceal or disguise the nature, location, source, ownership, or control of proceeds from unlawful activity. It also emphasizes the necessity of intent to conceal or disguise these aspects. This directly relates to the proposition, as Myers' actions of transferring funds to a PayPal account and purchasing a burner phone could be seen as efforts to conceal the source and ownership of the funds, thus meeting the intent requirement for money laundering.

[Money laundering.](#)

American Criminal Law Review - Georgetown University Law Center - Provost, Mark A. - 2009-03-22

Extract

a financial transaction involving property that a law enforcement officer represents to be the proceeds of a specified unlawful activity with the intent to: (i) promote specified unlawful activity; (ii) conceal or disguise the nature, location, source, ownership, or control of the proceeds of specified unlawful activity; or (iii) avoid a state or federal transaction reporting requirement. Because this section requires only that a defendant believe that the money in question is criminally derived, informants and undercover officers are able to use money that is not actually criminally derived during sting operations.

Summary

Intent requirements under 18 U.S.C. § 1956, specifically highlighting the necessity of intent to conceal or disguise the nature, location, source, ownership, or control of proceeds from specified unlawful activities. This directly relates to the proposition, as Myers' actions of transferring funds to a PayPal account and purchasing a burner phone could be seen as attempts to conceal the source and ownership of the funds, thus meeting the intent requirement for money laundering under the statute.

[Money laundering.](#)

American Criminal Law Review - Georgetown University Law Center - Kaufman, Max - 1997-01-01

Extract

The offenses contained in this subsection result when an individual conducts or attempts to conduct a financial transaction with criminally derived money... (3) conducting a financial transaction designed to conceal or

disguise the nature, location, source, ownership, or control of the proceeds of specified unlawful activity.

Summary

The passage outlines that 18 U.S.C. § 1956(a)(1) criminalizes financial transactions conducted with the intent to conceal or disguise the nature, location, source, ownership, or control of proceeds from specified unlawful activities. This directly relates to the proposition, as Myers' actions of transferring funds to a PayPal account and purchasing a burner phone could be seen as attempts to conceal the source and ownership of the funds, thus constituting money laundering under this statute.

[Money laundering.](#)

American Criminal Law Review - Georgetown University Law Center - Hart, Carolyn L. - 2014-09-22

Extract

Offenses prohibited by [section] 1956(a)(1) are commonly known as 'transaction money laundering' offenses because the prohibited act is the financial transaction itself. (43) The four prohibited financial transactions are: ... (iii) transactions designed to conceal or disguise the nature, location, source, ownership, or control of the proceeds of specified unlawful activity; (47) ... Section 1956 requires proving one of four intents: ... (iii) intent to conceal or disguise the nature, location, source, ownership, or control of the proceeds of specified unlawful activity; ... Proving that the defendant possessed at least one of the required forms of intent is necessary for a conviction under [section] 1956. (141) ... United States v. Garcia-Emanuel, 14 F.3d 1469,1475-76 (10th Cir. 1994) (listing various examples of evidence of intent to disguise or conceal transaction, including statements by defendant probative of intent to conceal, unusual secrecy surrounding transaction, structuring transaction in way to avoid attention, depositing illegal profits in bank account of legitimate business, using third parties to conceal real owner, or engaging in unusual financial moves cumulating in transaction);

Summary

18 U.S.C. § 1956(a)(1) criminalizes financial transactions intended to conceal or disguise the nature, location, source, ownership, or control of proceeds from specified unlawful activities. The passage provides examples of actions that can demonstrate intent to conceal, such as using third parties or engaging in unusual financial transactions. This aligns with the proposition that Myers' actions of transferring funds to a PayPal account and purchasing a burner phone to conceal the source and ownership of the funds could constitute money laundering.

[Money laundering.](#)

American Criminal Law Review - Georgetown University Law Center - Nagel, Pancho - 2015-09-22

Extract

Section 1956 requires proving one of four intents: (i) intent to promote a specified unlawful activity; (ii) intent to engage in a violation of [section] 7201 or [section] 7206 of the Internal Revenue Code; (iii) intent to conceal or disguise the nature, location, source, ownership, or control of the proceeds of specified unlawful activity; or (iv) intent to avoid a reporting requirement under state or federal law. (139)

Summary

Intents required to establish a money laundering offense under 18 U.S.C. § 1956. Specifically, it highlights the intent to conceal or disguise the nature, location, source, ownership, or control of the proceeds of specified unlawful activity. This directly relates to the proposition, as Myers' actions of transferring funds to a PayPal account and purchasing a burner phone could be seen as efforts to conceal the source and ownership of the funds, thus satisfying the intent requirement for money laundering.

[Untangling Laundered Funds: The Tracing Requirement Under 18 U.S.C. \[section\] 1957.](#)

Stanford Law Review - Stanford Law School - Spensley, Audrey - 2023-05-01

Extract

a broad judicial interpretation of the 'concealing' prong in [section] 1956(a)(1)(B)(i). A defendant can be convicted under [section] 1956 for simply depositing illicit funds if the government can prove he did so to 'conceal or disguise' the nature of the money. See, e.g., United States v. Iacoboni, 221 F. Supp. 2d 104, 114-15 (D. Mass. 2002).

Summary

Broad interpretation of the "concealing" prong under 18 U.S.C. § 1956(a)(1)(B)(i), which is relevant to the proposition. It indicates that a defendant can be convicted for depositing illicit funds if the intent to conceal or disguise the nature of the money is proven. This aligns with the proposition that Myers' actions of transferring funds to a PayPal account and purchasing a burner phone were intended to conceal the source and ownership of the funds, thus constituting money laundering.

[Critical Tornado Cash Developments Have Significant Implications For DeFi AML And Sanctions Compliance](#)

Extract

With respect to conspiracy to commit money laundering, the indictment alleges a violation of 18 U.S.C. § 1956(a)(B)(i), which prohibits conduct where a person “knowing that the property involved in a financial transaction represents the proceeds of some form of unlawful activity, conducts or attempts to conduct such a financial transaction which in fact involves the proceeds of specified unlawful activity ... knowing that the transaction is designed in whole or in part ... to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity.”

Summary

Clear legal basis for considering such actions as money laundering under federal law.

This memo was compiled by Vincent AI based on vLex materials available as of June 20, 2025. [View full answer on vLex](#)