NO. 25-

IN THE

SUPREME COURT OF THE UNITED STATES

DWAYNE SHERMAN,

Petitioner

v.

UNITED STATES OF AMERICA,

Respondent

On Petition for a Writ of Certiorari to the
United States Court of Appeals for the Third Circuit

PETITION FOR A WRIT OF CERTIORARI

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QUESTION PRESENTED

To sustain a conviction for money laundering under 18 U.S.C. § 1956(a)(2)(B)(i), there must be proof, among other things, that a defendant knew that the transportation of illicit funds across the border was *designed* to conceal or disguise the nature, location, source, ownership, or control of such funds. As this Court explained in *Regalado Cuellar v. United States*, 553 U.S. 550 (2008), "design" means purpose or plan, not merely effect, so substantial efforts to conceal money are insufficient to support a conviction.

Following *Regalado Cuellar*, two Circuits, the Third and the Nineth, have loosened the above standard, while the Second Circuit has adhered to *Regalado Cuello*. Should this Court thus resolve the existing divide over the breadth of the money laundering statute?

PARTIES TO THE PROCEEDINGS

Petitioner, the defendant-appellant below, is Dwayne Sherman.

Respondent, the appellee below, is the United States of America.

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PETITION FOR A WRIT OF CERTIORARI

The Petitioner, Dwayne Sherman, hereby petitions this Court for a writ of certiorari to review the final order of the Court of Appeals for the Third Circuit.

OPINIONS BELOW

The opinion of the Court of Appeals for the Third Circuit is reported at *United States v. Sherman*, 126 F.4th 224 (3d Cir. 2025), and reproduced at Petition Appendix ("Pet. App.") 1a-18a. The district court's opinion is available at *United States v. Sherman*, No. 1:20-CR-00157, 2023 WL 5182600 (M.D. Pa. Aug. 11, 2023), and reproduced at Pet. App. 19a-60a.

JURISDICTION

The Court of Appeals entered judgment on January 16, 2025, Pet. App. 18a. This Court thus has jurisdiction under 28 U.S.C. § 1254(1).

STATUTORY PROVISION

Laundering of monetary instruments

(2) Whoever transports, transmits, or transfers, or attempts to transport, transmit, or transfer a monetary instrument or funds from a place in the United States to or through a place outside the United States or to a place in the United States from or through a place outside the United States—

* * *

(B) knowing that the monetary instrument or funds involved in the transportation, transmission, or transfer represent the proceeds of some form of unlawful activity and knowing that such transportation, transmission, or transfer 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 monetary instrument or funds involved in the transportation, transmission, or transfer, whichever is greater, or imprisonment for not more than twenty years, or both. For the purpose of the offense described in subparagraph (B), the defendant's knowledge may be established by proof that a law enforcement officer represented the matter specified in subparagraph (B) as true, and the defendant's subsequent statements or actions indicate that the defendant believed such representations to be true.

18 U.S.C. § 1956(a)(2)(B)(i).

INTRODUCTION

When does a bulk cash transfer become money laundering under 18 U.S.C. § 1956(a)(2)(B)(i)? This Court answered that question in *Regalado Cuellar,* that is, when the purpose—not the effect—of the transfer is to conceal or disguise a listed attribute of the cash. Efforts, even substantial ones, of concealment during transportation are not enough. Yet in Petitioner, Dwayne Sherman's case, the government argued that his conduct became money laundering under subsection (2)(B)(i) when he referred to the money as "titles" and when the transporting individual concealed it. The Third Circuit agreed, aligning itself with the Ninth Circuit on this issue. In so doing, the court expanded the breadth of the money laundering statute, departed from this Court's holding in *Regalado Cuellar*, and deepened a circuit split.

A writ of certiorari should be granted so that this Court may clarify the reach of the money laundering statute.

STATEMENT OF THE CASE

A.

Background

The government indicted Petitioner, Dwayne Sherman, for drug trafficking, conspiracy to traffic drugs in Pennsylvania and California, as well as money laundering and conspiracy to launder money. Pet App. 3a. Of import here, three of the money laundering counts were brought under 18 U.S.C. § 1956(a)(2)(B)(i), which proscribes transporting or transferring illegal proceeds to conceal or disguise their nature, location, source, ownership, or control. The facts surrounding these charges follows.

B.

The money drops and Beltran organization

The government introduced evidence related to the three money drop offs through the testimony of FBI agents Juan Pablo Salazar, Dario Duarte, and Eric Rardain, Pennsylvania State Trooper Shawn Wolfe, and a government informant identified under the alias "Ruben Martin." Pet. App. 3a-5a, 21a-24a. On each of those instances, which occurred on October 27, 2015, December 2, 2015, and January 15, 2016, either Martin or another confidential human source/informant ("CHS 1") arranged a meet up with Mr. Sherman in a public parking lot outside Harrisburg, Pennsylvania, where Mr. Sherman gave them cash. *See id*.

Agent Salazar testified that law enforcement was initially led to Harrisburg, Pennsylvania, while conducting a drug trafficking investigation focused on individuals associated with a money exchange ("*casa de cambio*") in Tijuana, Mexico.

Pet. App. 21a. During that investigation, law enforcement relied on Martin and CHS 1 to gather information about the targeted individuals. *See* Third Circuit Appendix 277 ("C.A. ___").

Salazar testified that an unspecified target in Tijuana wanted Martin and CHS 1 to pick up money in Harrisburg, Pennsylvania. Pet. App. 21a. Salazar claimed that the informants recorded a conversation in which the target provided them with a phone number and a code word to use to arrange the pickup, as well as an approximate amount of money to expect. *Id*. No such recorded conversation was introduced at trial and Martin testified that FBI agents, not a target from Tijuana, provided him with the phone number and told him the amount of money he should expect to pick up in Harrisburg. C.A. 336–37.

In October 2015, Salazar and Martin traveled to Harrisburg to collect the money. Pet. App. 4a, 22a. On October 26, Martin called the number provided to him and said he was calling "on behalf of your brother," which was the passcode he had been told to use. *See id*. At the time, law enforcement did not know who the phone number belonged to. C.A. 278. A person later determined to be Mr. Sherman answered the phone and agreed to meet Martin the next day. Pet. App, 4a, 22a.

The next day, Martin called Mr. Sherman again and arranged to meet in the parking lot of the Capitol Diner in Harrisburg. C.A. 279, 314. Law enforcement observed Mr. Sherman pull into the parking lot and park behind Martin's rental vehicle. C.A. 392. Mr. Sherman exited his vehicle, put two bags in the backseat of Martin's vehicle, and then briefly sat in Martin's vehicle with him before getting back

into his own vehicle and exiting the parking lot. Pet. App. 22a. Martin testified that he asked Sherman how many "titles" were in the bags and Sherman responded that there were 277, which meant $277,000. Pet. App. 4a.

After Mr. Sherman left, law enforcement took the bags, confirmed they contained $277,000, and brought the money to San Diego. C.A. 280–81. Salazar testified that Martin then connected with "subjects in Mexico" to arrange a time and place to pass off the money. Pet. App. 4a, 22a. On November 2, 2015, Martin met a man whose identity he did not know at a Starbucks in San Diego and gave him the money. *Id*. Law enforcement observed the man drive away before meeting up with another individual and handing off the money again. C.A. 282. Police then stopped the car near the Mexican border, finding $207,590 floating in the gas tank. Pet. 4a.

The second money drop off involving Mr. Sherman occurred on December 2, 2015. Pet. App. 22a. This time, CHS 1 picked up the money under the supervision of Agent Duarte. *Id*. The government introduced a phone call between CHS 1 and Mr. Sherman ahead of the drop off where CHS 1 asked Mr. Sherman "how much" he would be bringing, and Mr. Sherman responded "170." Pet. App. 23a. Like the first time, the exchange took place in a parking lot in Harrisburg. Pet. App. 22a. Agent Rardain, who observed the exchange, testified that Mr. Sherman parked beside CHS 1, got into his vehicle, gave him a bag, and then left after very minimal conversation. C.A. 393. The government introduced a recording of the interaction where Mr. Sherman and CHS 1 are heard briefly counting the money, which law enforcement later confirmed was $170,000. *Id*.

Law enforcement once again brought the money to San Diego where CHS 1 arranged a money drop. Pet. App. 5a, 23a. Salazar participated in surveillance and testified that he observed the exchange and followed the car containing the individual who received the money as it headed towards Mexico. C.A. 282, 288. Salazar "peel[ed] off" on an exit before the border and did not observe the car enter Mexico. C.A. 288.

Martin testified that, after the second drop off, "the owners" of the money wanted to meet with him in Tijuana. Pet. App. 5a, 23a. On January 7, 2016, Martin went to the money exchange or *casa de cambio* in Tijuana and met with a man named Carlos Beltran. Pet. App. 23a. Martin testified that Beltran was pleased with his work on the money deliveries and asked whether Martin could start smuggling drugs in addition to money but did not specify which type of drugs at this meeting. *Id*. Martin also claimed that Beltran requested that he transport money in smaller amounts going forward to minimize the risk that large amounts of cash would be seized by law enforcement. *Id*.

Soon thereafter, the third and final money drop involving Mr. Sherman took place. On January 15, 2016, Mr. Sherman met Martin in a parking lot in Harrisburg where he gave him a bag containing approximately $107,000 in cash. Pet. App. 24a. The government introduced an audio recording of this meeting as well. Law enforcement again brought the money to San Diego where it was passed on to another individual. *See id*. Salazar testified that it was his understanding that the cash was then taken into Mexico. C.A. 291. Duarte confirmed that neither Mr. Sherman nor

the informants ever mentioned drugs, Mexico, or Carlos Beltran during any of the three money drops. C.A. 307.

Martin testified that he met with Carlos Beltran again at the *casa de cambio* in Tijuana on April 6, 2016. Pet. 5a, 24a. Martin first testified that Beltran brought "another young guy" to the meeting but later said no one else was at the meeting. C.A. 325, 335. Martin testified that Beltran told him that he normally uses flight attendants to smuggle drugs across the United States, but recent security crackdowns made that more difficult. *See id*. Martin claimed that Beltran asked him whether he could use the same trucks he used to move the money to smuggle drugs, specifically meth and heroin. C.A. 328. Martin initially testified that Beltran told him the drugs needed to go from Los Angeles to New York. *Id*. He then changed course and testified that Beltran asked him to bring drugs from California to "Philly." *Id*. The government then asked if Beltran used the word "Fila," and Martin said yes. *Id*. Martin then testified that "Fila" referred to "the guy we met" when picking up the cash. *Id*. No explanation was provided for the shifting narrative or how a reference to "Fila" suggested that Beltran wanted him to deliver drugs to Mr. Sherman in Harrisburg. *Id*. Martin then testified that Beltran also asked him if he could find private planes and pilots who could fly drugs from Los Angeles to New York. C.A. 329–30.

On cross-examination, Martin acknowledged that Beltran's proposal for him to smuggle drugs never materialized and he did not know if Beltran ever took any steps towards enacting the plan. Pet. App. 5a; C.A. 330, 334. He also testified that he

never told Mr. Sherman about Beltran's proposal and did not know whether Beltran had, that Beltran never mentioned Mr. Sherman's name during any of their interactions, and that he had no information that Mr. Sherman ever received drugs from Beltran. C.A. 330, 336. Salazar testified that he had no information indicating that the Beltran organization contacted Mr. Sherman other than through Martin and CHS 1. C.A. 297–98.

C.

The verdict, post-trial motions, and sentencing

The jury found Mr. Sherman guilty on all counts. The district court, however, granted Mr. Sherman's post-trial motion on three of the substantive money laundering counts under 18 U.S.C. § 1956(a)(2)(B)(ii), vacating those convictions. The court held that those convictions were merely different means of committing the same offense. Pet. App. 8a, 60a. The court later sentenced Mr. Sherman to, among other things, serve a 262-month term of imprisonment.

D.

The appeal

On appeal, the Third Circuit affirmed. Pet. App. 18a. In doing so, the court cited four circumstances that, it the panel's view, distinguished Mr. Sherman's case from *Regalado Cuellar*. First, the court emphasized that Mr. Sherman referred to the cash in code, *see* Pet. App. 11a, that is, he said that it was "titles." Second, Mr. Sherman drove evasively after dropping off the cash. *See id.* Third, his bank transactions were below the $10,000 reporting threshold. *See id.* And finally, the

money was delivered to a *casa de cambio* and converted to Mexican currency to disguise its origin. *Id.* Two of these circumstances (evasive driving and the bank reporting threshold) have nothing to do with the particular offense and the third (converting the money at a *casa de cambio*) is unsupported by the record.

REASONS FOR GRANTING THE PETITION

A. The Third Circuit's construction of Section 1956(a)(2)(B)(i) of the Money Laundering Statute conflicts with this Court's precedent.

To convict Mr. Sherman of money laundering under Section 1956(a)(2)(B)(i), the government had to prove that he "(1) attempted to transport funds from the United States to Mexico, (2) knew that these funds 'represent[ed] the proceeds of some form of unlawful activity,' e.g., drug trafficking, and (3) knew that 'such transportation' was designed to 'conceal or disguise the nature, the location, the source, the ownership, or the control' of the funds." *Regalado Cuellar*, 553 U.S. at 561.

In *Regalado Cuellar*, this Court defined the scope of Section 1956(a)(2)(B)(i)'s third element: that the defendant knew that the transportation of illicit funds across the border was designed to conceal or disguise the nature, location, source, ownership, or control of such funds. 553 U.S. at 561–68. There, the defendant was convicted of money laundering under Section 1956(a)(2)(B)(i) after police officers found $81,000 in narcotics proceeds during a search of his car. *Id.* at 553–54. The defendant had been stopped in Texas while driving south towards the Mexican border and the cash was found bundled in plastic bags and duct tape hidden inside a recently created secret compartment under the rear floorboard. *Id.* The defendant had spread animal hair

in the rear of the vehicle in what law enforcement believed to be an attempt to mask the smell of marijuana. *Id*. at 554. During the stop, the defendant told officers that he had to have the car in Mexico before midnight or else his family would be "floating down the river." *Id*.

On appeal, the Fifth Circuit, after granting rehearing, affirmed the conviction, finding that the defendant's extensive efforts to prevent detection of the funds during transportation showed that he sought to conceal or disguise the nature, location, source, ownership, or control of the funds. *Id*. at 556–57. This Court reversed, holding that evidence that a defendant hid illicit funds during transportation cannot support a conviction under Section 1956(a)(2)(B)(i), even if substantial efforts have been expended to conceal the money. *Id*. at 563. This Court focused its analysis on the meaning of "design" in the phrase "knowing that such transportation is designed . . . to conceal or disguise. *Id*. Finding that "'design' means purpose or plan, *i.e.*, the intended aim of the transportation," this Court concluded that a conviction under the statute "requires proof that the purpose—not merely effect—of the transportation was to conceal or disguise a listed attribute" of the transported funds. *Id*. at 563, 567. In other words, the government must prove that the defendant knew that the purpose of moving the illicit funds across the border was to disguise or conceal the nature, location, source, ownership, or control of those funds.

This Court rejected the government's argument that substantial efforts at concealment during transportation is circumstantial evidence that the transportation aims to conceal a listed attribute, explaining that "[t]here is a difference between

concealing something to transport it, and transporting something to conceal it; that is, how one moves the money is distinct from why one moves the money," and "[e]vidence of the former, standing alone, is not sufficient to prove the latter." *Id*. at 563, 566 (internal quotation marks and citation omitted).

The *Regalado Cuellar* Court thus found that the government's evidence suggested that the purpose of the defendant's secretive transportation of the cash across the border was to compensate the leaders of the drug trafficking organization. *Id*. at 566. That was not enough because such "evidence suggested that the secretive aspects of the transportation were employed merely to facilitate the transportation, but not necessarily that the secrecy was the purpose of the transportation." *Id*. at 567 (internal citations omitted). This Court noted that "the Government failed to introduce any evidence that the reason drug smugglers move money to Mexico is to conceal or disguise a listed attribute of the funds." *Id*.; *see also id*. at 567 n.8 ("Although . . . the Government introduced some evidence regarding the effect of transporting illegally obtained money in Mexico, the Government has not pointed to any evidence in the record from which it could be inferred beyond a reasonable doubt that petitioner knew that taking the funds to Mexico would have had one of the relevant effects."). As a result of these deficiencies, the Court concluded that the defendant's "conviction cannot stand." *Id*. at 568.

Here, the Third Circuit attempted to distinguish Mr. Sherman's facts from those at issue in *Regalado Cuellar*. But the distinctions that the court relied on were, in significant part, unrelated to the money transfer, unrelated to the particular

money laundering offense, or unsupported by the record. For example, that Mr. Sherman used code words to describe the cash, referring to it as "titles" when delivering the cash to the confidential human sources does nothing to prove that the purpose of the transportation was to conceal or disguise a listed attribute of the funds. *See United States v. Ness*, 565 F.3d 73, 78 (2d Cir. 2009); *cf., e.g.*, *United States v. Garcia*, 587 F.3d 509, 517-18 (2d Cir. 2009) (applying *Regalado Cuellar's* framework to the transactional money laundering provision in 18 U.S.C. § 1956(a)(1)(B)(i)).

Likewise, the fact that the surveilling agents thought that Mr. Sherman drove evasively home following the money drop does nothing to establish that the purpose of the informant's later transportation was to conceal or disguise an attribute of the funds. Similarly, the $10,000 bank reporting threshold has no effect on the money drops. Transporting illicit funds from the United States to a place outside the United States to avoid a transaction reporting requirement cannot be the basis for a conviction under Section 1956(a)(2)(B)(i) because that conduct is separately and expressly criminalized in the immediately succeeding subsection, Section 1956(a)(2)(B)(ii).

To illustrate, Section 1956(a)(2)(B)(ii) prohibits the transportation of illicit funds from inside the United States to a place outside the country "to avoid a transaction reporting requirement under State or Federal law." 18 U.S.C. § 1956(a)(2)(B)(ii). If evidence that funds were moved out of the country to avoid a reporting requirement can prove a violation of Section 1956(a)(2)(B)(i), then Section 1956(a)(2)(B)(ii) serves no purpose and is superfluous. The anti-surplusage canon

counsels against this reading of Section 1956(a)(2)(B)(i). *See United States v. Jackson*, 964 F.3d 197, 203 (3d Cir. 2020) (quoting *Duncan v. Walker*, 533 U.S. 167, 174 (2001)) ("[A]ccording to the 'anti-surplusage' canon, 'it is our duty to give effect, if possible, to every clause and word of a statute.'"); *Sosa v. Alvarez-Machain*, 542 U.S. 692, 711, n.9 (2004) ("[W]hen the legislature uses certain language in one part of the statute and different language in another, the court assumes different meanings were intended."). And the anti-surplusage canon is strongest where, as here, "an interpretation would render superfluous another part of the same statutory scheme." *Marx v. Gen. Revenue Corp.*, 568 U.S. 371, 386 (2013); *see also United States v. Jicarilla Apache Nation*, 564 U.S. 162, 185 (2011) (quoting *Mackey v. Lanier Collection Agency & Service, Inc.*, 486 U.S. 825, 837 (1988)) ("As our cases have noted in the past, we are hesitant to adopt an interpretation of a congressional enactment which renders superfluous another portion of that same law."); *Fischer v. United States*, 144 S. Ct. 2176, 2188–89 (2024).

That leaves the supposed evidence involving the *casa de cambio*. Here again, this connection is illusory. The only evidence related to the *casa de cambio* came in through the testimony of the government's informant, identified at trial under the pseudonym Ruben Martin. Martin testified that he twice met with Beltran at a *casa de cambio* in Tijuana. C.A. 317, 325. He explained that, in general, a *casa de cambio* is "a safe place where people go to make transactions from – change the currency from U.S. dollars to Mexican pesos." C.A. 317. Martin added that a man named Julio owned the *casa de cambio* in Tijuana and was a "broker" for "different cartels in

Mexico," but did not explain what that meant. C.A. 317, 321. Julio did not attend the meetings between Martin and Beltran. Martin's testimony contained no indication that the *casa de cambio* played any role in the case aside from serving as the location that he met with Beltran.

Apart from failing to prove that any money drop cash was sent to the *casa de cambio*, the government presented no evidence that Mr. Sherman or others intended for the money drop cash to be sent there. The government presented no evidence that Mr. Sherman knew that the *casa de cambio* existed it all. There is no evidence he ever visited the *casa de cambio* and it was never mentioned during any of the money drops. Nor did Beltran mention sending money to or receiving money at the *casa de cambio* during his meetings with Martin. The Third Circuit's reliance on this point thus fails to distinguish Mr. Sherman's case from *Regalado Cuellar*.

B. The Courts of Appeal are divided over the breadth of the Money Laundering Statute.

The Second Circuit has adhered to this Court's framework in *Regalado Cuellar*. In *Ness*, 565 F.3d at 73, as here, the prosecution brought under Section 1956(a)(2)(B)(i). There, the government presented evidence that the defendant transported millions of dollars in narcotics proceeds abroad at the behest of drug traffickers using "clandestine meetings to transfer large sums of concealed cash," "coded language," "the scrupulous avoidance of a paper trial," and the "commingl[ing]" of the illicit funds with "jewelry and other valuables" to conceal the funds. *Ness*, 565 F.3d at 76. The Second Circuit overturned the defendant's Section 1956(a)(2)(B)(i) conviction, finding that although "such evidence may indicate that

Ness was concealing the nature, location, or source of the narcotics proceeds, it does not prove that his purpose in transporting the proceeds was to conceal these attributes." *Id*. at 78. Mr. Sherman's case mirrors *Ness*: although the evidence shows that the money drop cash was concealed during transportation, the government did not prove that the purpose of transporting the cash into Mexico was to conceal a listed attribute or that Mr. Sherman knew of such a purpose. Indeed, Mr. Sherman at one point made statements to the effect that the money was simply payment for what was owed. *Compare* C.A. 324 (Sherman stating to Martin: "that's all done, it's all – he's all paid") *with Regalado Cuellar,* 553 U.S. at 566-67 (secretive transportation of money across the border to compensate leaders of drug trafficking organization insufficient to show that secrecy was the purpose).

The Ninth Circuit and now the Third Circuit have departed from this Court's construct of Section 1956(a)(2)(B). In *United States v. Singh*, 995 F.3d 1069 (9th Cir. 2021), the Ninth Circuit upheld the money laundering conviction of a defendant who used a secretive and convoluted transaction system to transfer illicit funds to a Mexican cartel. *See* 995 F.3d at 1073. *Singh*, however, dealt with a different money laundering statute than *Regalado Cuellar* and Mr. Sherman's case: 18 U.S.C. § 1956(a)(1)(B)(i) rather than 18 U.S.C. § 1956(a)(2)(B)(i). *See* 995 F.3d at 1075. Section 1956(a)(1)(B)(i), at issue in *Singh*, targets financial transactions involving illicit funds, whereas Section 1956(a)(2)(B)(i) concerns the cross-border transportation of illicit funds. The Ninth Circuit held that the use of "convoluted" rather than "simple" transactions is sufficient to prove the concealment purpose

element under Section 1956(a)(1)(B)(i). *Id.* at 1076–77 (quoting *United States v. Wilkes*, 662 F.3d 524 (9th Cir. 2011)). In contrast, this Court has held that "merely hiding funds during transportation is not sufficient to violate [Section 1956(a)(2)(B)(i)], even if substantial efforts have been expended to conceal the money." *Regalado Cuellar*, 553 U.S. at 563. Indeed, dissenting from the majority in *Singh*, Judge Watford explained that the majority's decision conflicted with *Regalado Cuellar* because the government's evidence established only that the transactions at issue had the effect of concealing a listed attribute of the illicit funds, not that concealing a listed attribute was the intended aim of the transactions. *See Singh*, 995 F.3d at 1082–85 (Watford, J., dissenting).

Given the divide over the reach on the Money Laundering Statute, this Court should grant certiorari to clarify this area.

CONCLUSION

For all these reasons, this Honorable Court should grant the petition for a writ of certiorari.

Respectfully submitted,

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