**18.7A Money Laundering Conspiracy**

**(18 U.S.C. § 1956(h))**

The defendant is charged in [Count of] the indictment with money laundering conspiracy in violation of Section 1956(h) of Title 18 of the United States Code. For the defendant to be found guilty of that charge, the government must prove each of the following elements beyond a reasonable doubt:

First, there was an agreement to commit money laundering;

Second, the defendant knew the objective of the agreement;

Third, the defendant joined the agreement with the intent to further its unlawful purpose.

**Comment**

The above elements were set out in *United States Jaimez*, 45 F.4th 1118, 1123 (9th Cir. 2022). *See also United States Collazo*, 984 F.3d 1308, 1319 (9th Cir. 2021) (en banc). *See United States v. Kimbrew*, 406 F.3d 1149, 1152 (9th Cir. 2005), and *United States v. Alghazouli*, 517 F.3d 1179, 1189 (9th Cir. 2008), regarding element one. *See United States v. Moreland*, 622 F.3d 1147, 1169 (9th Cir. 2010), regarding element two.