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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
  
Plaintiff,

vs.

Paul ENGSTROM, Vincent CUOMO, Abraham  
ELLIOTT, and Joseph KRIEGER  
  
Defendants.

**Criminal Complaint**

Case No.: 2:21-mj-536-BNW  
Case No.: 2:21-mj-537-BNW  
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Case No.: 2:21-mj-539-BNW

**Violations:**

**Count One**

21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A)(ii) –  
Conspiracy to Distribute a Controlled  
Substance -Cocaine

**Count Two**

18 U.S.C. § 1956(a)(1)(A)(i), and (h) – Money  
Laundering Conspiracy

1 BEFORE the United States Magistrate Judge, Las Vegas, Nevada, the undersigned  
2 complainant, being duly sworn, deposes and states:

3 **COUNT ONE**

4 (Conspiracy to Distribute a Controlled Substance – Cocaine)

5 From a date unknown and continuing to on or about June 21, 2021, in the State and  
6 Federal District of Nevada,

7 **PAUL ENGSTROM, VINCENT CUOMO, ABRAHAM ELLIOT,  
and JOSEPH KRIEGER**

8 defendants herein, knowingly and intentionally combined, conspired, confederated, and agreed with  
9 other persons known and unknown to distribute 5 kilograms or more of a mixture and substance  
10 containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title  
11 21, United States Code, Sections 846 and 841(a)(1), (b)(1)(A)(ii).

12 **COUNT TWO**

13 (Money Laundering Conspiracy)

14 Beginning from a time unknown, and continuing to on or about June 21, 2021, in the State  
15 and Federal District of Nevada,

16 **PAUL ENGSTROM**

17 defendant herein, and others known and unknown, knowing that the property involved in financial  
18 transactions affecting interstate commerce represented the proceeds of some form of unlawful  
19 activity, did combine, conspire, and agree to conduct such financial transactions, which, in fact,  
20 involved proceeds of specified unlawful activity, that is, conspiracy to distribute a controlled  
21 substance as charged in Count One of this Complaint, with the intent to promote the carrying on of  
22 the specified unlawful activity, and knowing the transactions were designed to promote the specific  
23

1 unlawful activity, in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), all in  
2 violation of Title 18, United States Code, Section 1956(h).

3 Complainant, Daniel Kurinec, as a Special Agent with the Drug Enforcement Administration  
4 (DEA), states the following as and for probable cause:

5 1. Complainant is a Special Agent (SA) with the Drug Enforcement Administration  
6 (DEA) and an “investigative or law enforcement officer of the United States” within the meaning of  
7 Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is  
8 empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in  
9 Title 18, United States Code, Section 2516. Complainant has been employed by the DEA as a  
10 special agent since October 2016. Complainant is currently assigned to the DEA Las Vegas,  
11 Nevada, District Office (LVDO), Enforcement Group 3 (EG3), Financial Investigation Team (FIT),  
12 and is responsible for investigating money laundering offenses including but not limited to cases  
13 involving drug trafficking, weapons violations, as well as investigations into the activities and  
14 operations of criminal enterprises. Your Complainant has experience in conducting criminal  
15 investigations, including the investigation of criminal groups and conspiracies, as well as the  
16 collection of evidence and the identification and use of witnesses.

17 2. As a Special Agent for the DEA, I have participated in numerous narcotics  
18 investigations involving various types of controlled substances. I have received substantive  
19 advanced training pertaining to the investigation of various crimes which arise from narcotics  
20 trafficking, including money laundering, the use of shell companies to conceal and disguise the  
21 proceeds of drug trafficking, and the use of telecommunications facilities in the furtherance of  
22 narcotics trafficking. I have participated in investigations involving the purchase of controlled  
23 substances from suspected narcotics traffickers using both undercover narcotics investigators and

1 confidential sources. I have participated in the drafting and execution of search warrants for  
2 narcotics, the proceeds from the sale of narcotics, documentary evidence of narcotics trafficking,  
3 and for the telecommunications devices used by narcotics traffickers. I have also conducted  
4 surveillances in connection with narcotics investigations.

5 3. Through the course of these investigations, I have personally interviewed confidential  
6 sources and other persons involved in the distribution of illegal narcotics. I have also interviewed  
7 persons arrested for the distribution of illegal narcotics. I have spoken with more experienced  
8 narcotics investigators with whom I have worked concerning the practices of narcotics traffickers  
9 and the best investigative methods to use when conducting investigations of narcotics trafficking  
10 organizations. Through the course of my investigations and through my conversations with more  
11 experienced narcotics investigators, I have become familiar with the methods and means utilized by  
12 persons who participate in the illegal distribution of controlled substances.

13 4. The following is based on my own investigation or was provided to me by other law  
14 enforcement officers. I have not included every fact known to me concerning this offense. I have set  
15 forth only the facts that I believe are essential to establish the necessary foundation for this  
16 complaint.

17 **PROBABLE CAUSE**

18 **COUNT 1**

19 1. DEA Enforcement Group 3 (EG3), has been investigating the ENGSTROM Drug  
20 Trafficking Money Laundering Organization (DTMLO) since October, 2020. To date the  
21 investigation has shown that that Paul Engstrom (ENGSTROM) and codefendants Vincent  
22 CUOMO, Abraham ELLIOT, and Joseph KRIEGER were using the dark web to distribute  
23 cocaine.

1           2.       During the investigation, EG3 also learned that ENGSTROM has been conducting  
2 large cryptocurrency for cash transactions in order to conceal the proceeds derived from selling  
3 cocaine over the dark web. Based on my training and experience, your Complainant knows that  
4 cryptocurrency is commonly used by individuals to hide illicit activities. EG3 conducted a criminal  
5 background check on ENGSTROM that revealed he had been previously convicted in 2017 in the  
6 District of Nevada of Conspiracy to Distribute a Controlled Substance in Case No 2:15-cr-255-JAD-  
7 PAL. On October 16, 2020, EG3 conducted surveillance on ENGSTROM at the residence listed  
8 on his Nevada driver's license, 487 Petal Dew Avenue, Las Vegas, Nevada. EG3 observed  
9 ENGSTROM carrying a corrugated plastic tote that postal workers typically carry, that say "not for  
10 private use." He put the tote in the front passenger seat of a Chevrolet Silverado registered to  
11 Vincent CUOMO who was also present at the location. ENGSTROM and CUOMO then entered  
12 the garage at 487 Petal Dew Avenue, exited a short time later and then departed the residence in  
13 their separate vehicles.

14           3.       EG3 established video surveillance on 304 E. Silverado Ranch Boulevard between  
15 December 10 and 28, 2020. The surveillance captured ENGSTROM, CUOMO and a third  
16 individual, Abraham Elliott (ELLIOTT), coming and going from this location in their respective  
17 vehicles on a regular basis. In addition, the surveillance revealed a silver Nissan Rogue regularly  
18 exiting the garage of the unit in the afternoon. The Rogue was typically gone from the residence for  
19 thirty to forty-five minutes before returning. Once the Rogue returned, ENGSTROM, CUOMO and  
20 ELLIOTT would leave shortly afterward in their respective vehicles.

21           4.       On December 29, 2020, EG3 established surveillance in the vicinity of 304 E.  
22 Silverado Ranch Boulevard Unit 1110. EG3 observed ENGSTROM, CUOMO and ELLIOTT each  
23 arrive at Silverado Ranch at separate times between 1:46pm and 3:28pm in their respective vehicles.

1 Shortly after, the silver Nissan Rogue exited the garage driven by ELLIOTT. EG3 surveilled the  
2 Nissan Rogue to a nearby Walmart parking lot located at 490 E. Silverado Ranch, Las Vegas,  
3 Nevada. The Nissan Rogue parked next to a black Chevy Sonic located on the east side of the  
4 parking lot near the pharmacy. The Chevy Sonic was registered to a Joseph Krieger (KRIEGER).  
5 EG3 observed ELLIOTT and KRIEGER open the hatchbacks to their respective vehicles and  
6 appear to move something from the Rogue into the Sonic. ELLIOTT and KRIEGER closed the  
7 hatchbacks to their vehicles, conversed for a few minutes and then went their separate ways.

8         5. EG3 continued surveillance on KRIEGER and followed him to a US Post Office  
9 located at 1801 N. Martin Luther King Blvd. KRIEGER deposited several envelopes in the drop  
10 box out front of the post office. EG3 immediately contacted the United States Postal Inspection  
11 Service (USPIS) as well as the post office management. Upon inspection of the drop box container,  
12 EG3 located fifteen USPS Priority Mail Envelopes at the top of the pile. Each envelope had the  
13 same return address, the same Priority postage stamp and was labeled the same. The shipping labels  
14 were for individuals located throughout the United States, including one for the US Virgin Islands.

15         6. EG3 contacted the North Las Vegas Police Department and requested assistance from  
16 a drug canine unit. Of the fifteen envelopes, the drug canine, alerted on four of the packages,  
17 indicating the presence of a narcotic odor or the odor of a controlled substance (heroin, cocaine,  
18 and/or methamphetamine) within the Priority envelope. EG3 obtained a search warrant to open  
19 and examine the four packages (Case No. 2:20-mj-1114-BNW). All four envelopes contained a  
20 white powdery substance that field tested and laboratory tested positive for cocaine. Three of the  
21 four envelopes contained approximately four grams each of cocaine. The fourth envelope contained  
22 approximately twenty-eight grams of cocaine.

23 ...

1           7.       EG3 identified ENGSTROM, CUOMO and ELLIOTT as co-conspirators utilizing  
2 304 E. Silverado Ranch Boulevard as a “stash house,” or a location utilized for the receiving,  
3 packaging and distribution of narcotics. EG3 believes that KRIEGER is a “runner” for the DTML  
4 in order to create further separation between the co-conspirators and their customers.

5           8.       EG3 surveilled the ENGSTROM DTML on several occasions between January and  
6 June 2021, observing the same pattern that was used on December 29, 2020. ENGSTROM,  
7 CUOMO and ELLIOTT met at the stash house in the afternoon in their respective vehicles.  
8 ELLIOTT exited the garage of the stash house in the silver Nissan Rogue and met up with  
9 KRIEGER. ELLIOTT delivered a black filing box to KRIEGER. KRIEGER then drove to two or  
10 three United States Post Offices to deposit a total of twenty to forty US Priority Envelopes in the  
11 drive thru drop box. Occasionally there are minor variances in the above described pattern, but this  
12 was the general method of operation for the ENGSTROM DTML.

13           9.       Throughout the investigation, EG3 has identified two separate stash houses. A stash  
14 house is a place used to store, process and deliver illicit drugs. The first stash house that EG3  
15 identified is located at 304 E. Silverado Ranch Boulevard, Las Vegas Nevada. EG3 placed a Metro  
16 Las Vegas PD drop car at the Silverado Ranch stash house between December 16 and January 4,  
17 2021. The video surveillance showed ENGSTROM, CUOMO, and ELLIOTT on several occasions  
18 arriving in their respective vehicles, the silver Nissan Rogue exiting the garage, the Rogue returning  
19 to the garage and then ENGSTROM, CUOMO, and ELLIOTT departing in their separate vehicles.  
20 ENGSTROM himself or his vehicle, was observed by EG3 on several occasions at the Silverado  
21 Ranch stash house including on December 29, 2021, January 7, January 12, January 28, March 15,  
22 March 16, and March 29, 2021. On April 13, 2021, EG3 observed GPS Ping data from  
23 ENGSTROM’s phone that indicated ENGSTROM was in the vicinity of 6145 Harrison Drive.

1 Ground surveillance confirmed that ENGSTROM was parked in front of Unit #4. Surveillance  
2 observed CUOMO and ELLIOT both arrive and the Rogue then depart Unit #4. EG3 determined  
3 that this was a second stash house. EG3 observed ENGSTROM at the Harrison stash house during  
4 June 7 and June 18, 2021 surveillance. During most of these occasions, ENGSTROM was at the  
5 stash house when ELLIOTT departed to meet up with KRIEGER and KRIEGER then made  
6 mailed the US Priority Envelopes. On several occasions, EG3 surveillance saw ENGSTROM place  
7 a black backpack in the trunk of his car and then drive away. Once ENGSTROM arrives at the  
8 stash house, he will retrieve the black backpack from the trunk. Based on training and experience,  
9 EG3 believes that there is likely a laptop and/or cocaine in the black backpack.

10 10. During the course of this investigation, EG3 interdicted and photographed 242 USPS  
11 Priority Mail Envelopes believed to have originated from the ENGSTROM DTMLO. Of the  
12 envelopes photographed, forty-four have been seized by EG3 and the USPIS and search warrants  
13 have been obtained to examine the contents. All 44 seized envelopes contained a white, powdery  
14 substance that field tested and/or laboratory tested positive for the presence of cocaine. The cocaine  
15 seized in thirty-nine of the forty-four envelopes are consistent with amounts for personal use.  
16 Cocaine seized in five of the forty-four envelopes constitute a distribution amount. The total amount  
17 of cocaine recovered during this investigation exceeded 5 kilograms.

18 11. In addition to identifying the method of distribution of the ENGSTROM DTMLO,  
19 EG3, with the help of UPSIS, also identified the method of sale. When the USPIS became involved  
20 in the investigation in January 2021, the look and appearance of the Priority envelopes were similar  
21 to those recovered in a 2019 UPSIS investigation. In 2019, USPIS had identified an individual  
22 selling cocaine on the dark web under the moniker "Insta" who was located in the Las Vegas area.  
23 Prior USPIS investigations have revealed that dark web vendors typically use cryptocurrency to



1 purchase metered postage strips online. However, “Insta” used Priority stamps which is rare.  
2 USPS investigators believe that the ENGSTROM DTMLO is associated with “Insta” because like  
3 “Insta” the ENGSTROM DTMLO used Priority stamps as postage to mail the envelopes which  
4 contained cocaine.

5 12. In March 2021, EG3 was able to locate “Insta” on the dark web marketplace White  
6 House Market. During the month of March 2021, EG3 made two purchases of seven grams of  
7 cocaine each from “Insta,” using an undercover identity and undercover mailing address. EG3 was  
8 unable to intercept the first package directly from the ENGSTROM DTMLO. The undercover  
9 purchase arrived to the undercover address in a Priority envelope with the exact same return address  
10 label, packaging and Priority postage stamp as other envelopes that EG3 intercepted from the  
11 ENGSTROM DTMLO. On March 29, 2021, EG3 set up surveillance at the 304 E. Silverado Ranch  
12 Boulevard stash location. EG3 identified all three vehicles belonging to ENGSTROM, CUOMO  
13 and ELLIOTT parked in the vicinity of the stash house. EG3 then observed ELLIOTT exit the  
14 garage and drive to the stash house in the silver Nissan Rogue. EG3 followed ELLIOTT to the  
15 nearby Walmart parking lot where he met with KRIEGER. EG3 then saw KRIEGER depart the  
16 Walmart parking lot and drive to two US Post Offices. EG3 observed KRIEGER depositing  
17 envelopes into the drive-thru drop boxes in front of the two post offices. EG3 then interdicted 21  
18 Priority Envelopes from the first post office and 22 Priority Envelopes from the second post office.  
19 Among the 22 envelopes from the second post office, EG3 located an envelope addressed to the  
20 undercover identity and address they used to make the dark web purchase from “Insta.” EG3 was  
21 able to intercept the second undercover purchase directly from the ENGSTROM DTMLO,  
22 confirming that the ENGSTROM DTMLO is selling cocaine on the dark web under the moniker  
23 “Insta.”

1           13.     When EG3 went on White House Market to make an undercover purchase of cocaine  
2 from “Insta” it learned that White House Market requires Monero for the transactions. Monero is a  
3 type of cryptocurrency that is untethered, meaning its value is not pegged to the value of gold or fiat  
4 money, and is subject to market fluctuations. However, it is a more private type of cryptocurrency.  
5 In order for EG3 to make an undercover purchase on White House Market, EG3 set up an account  
6 and added a certain amount of Monero to the profile. After making the purchase, the Monero  
7 remains in an escrow account with White House Market. Once the cocaine is received, the purchase  
8 is validated by the buyer and the escrow Monero is released to the vendor or “Insta” in this case.  
9 Your Complainant knows, based on training and experience, that dark web vendors typically  
10 convert untethered cryptocurrency like Monero to tethered currency to avoid market fluctuations.  
11 While conducting a financial investigation on ENGSTROM, EG3 learned through Currency  
12 Transaction Reports (CTR) filed by a local cryptocurrency exchange that ENGSTROM exchanges  
13 large quantities of Paxos Standard for cash. Paxos Standard is a type of tethered cryptocurrency that  
14 is pegged to the US Dollar.

15           14.     Verified buyer reviews found on the White House Market show that “Insta” has made  
16 over 3,280 cocaine sales between February 1, 2020 and May 23, 2021. “Insta” requires a minimum  
17 purchase of 3.5 grams of cocaine which means that the ENGSTROM DTMLO aka “Insta” has sold  
18 over twenty kilograms of cocaine on the dark web and distributed that cocaine utilizing the United  
19 States Postal Service.

20           15.     On June 16, 2021, EG3 obtained anticipatory search warrants in Case Nos. 2:21-mj-  
21 512-DJA and 2:21-mj-512-DJA. Pursuant to the warrants, law enforcement interdicted an entire  
22 day’s worth of parcel deliveries and seized the contents of those packages. On June 18, 2021, EG3  
23 set up surveillance on the ENGSTROM DTMLO. EG3 observed ENGSTROM, CUOMO and

ELLIOTT at the Harrison stash location. ELLIOTT departed the stash and met up with KRIEGER at a nearby Taco Bell parking lot. EG3 observed ELLIOTT and KRIEGER exit their vehicles and exchange black plastic filing boxes. EG3 then followed KRIEGER to two separate post offices where they observed him depositing Priority Mail envelopes in the drive-thru drop boxes. EG3 was able to intercept twenty-nine total USPS Priority Mail Envelopes. In accordance with the search warrant, EG3 seized all twenty-nine envelopes and discovered a white powdery substance in each envelope. EG3 conducted field tests on four of the envelopes, two from each post office as a sample of the larger seizure. All four field tests showed positive for cocaine. In one shipment alone, EG3 intercepted over 300 net grams of cocaine from the ENGSTROM DTMLO.

16. On June 21, 2021, EG3 executed federal search warrants on three residences (487 Petal Dew Avenue, 10388 Midseason Mist Street, 305 St. Augustine Lane) and two stash houses (6145 Harrison Drive, #4 and 304 E. Silverado Ranch Blvd.) associated with the ENGSTROM DTMLO. ENGSTROM, CUOMO and ELLIOTT were all present at the 6145 Harrison Drive stash house when the search warrant was executed. When law enforcement officers entered the premises ENGSTROM, CUOMO, and ELLIOT were in the process of packaging cocaine for shipment. ENGSTROM fled to a back office, locked the door, and refused commands to exit the office. CUOMO and ELLIOT attempted to run out of the back door and where later found hiding under trucks in the garage. It also appeared that an unknown quantity of a white powdery substance had just been flushed down the toilet. There was a white powdery substance around the toilet bowl, two spoons in the toilet and a metal tray with white powdery residue on the floor near the toilet. Law enforcement officers found multiple open plastic zipper bags on a television tray filled with a white powdery substance. There was a paper drinking cup filled with a white powdery substance next to two scales used for measuring quantities. Four pressed bricks of a white powdery

1 substance with the embedded insignia “BMW” where recovered from the same office where  
2 ENGSTROM was trying to hide from law enforcement. In addition, there were two large black  
3 filing cabinets that contained approximately one hundred Priority Mail Envelopes already packaged  
4 and sealed in containers labeled with various quantities of cocaine.  
5 EG3 conducted four random field tests on the white powdery substance as a sample of the larger  
6 seizure. All four field tests tested positive for the presumptive presence of cocaine. In total, EG3  
7 seized 6,800 grams of a white powdery substance that field tested positive for the presumptive  
8 presence of cocaine at the Harrison stash house.

9 **PROBABLE CAUSE**

10 **COUNT 2**

11 1. During the course of this investigation EG3 has identified the ENGSTROM  
12 DTMLO as the dark web cocaine vendor “Insta.” Your Complainant knows, based on training and  
13 experience, that the ENGSTROM DTMLO receives large quantities of cryptocurrency for its dark  
14 web sales of cocaine. EG3 has discovered, through the financial investigation of the ENGSTROM  
15 DTMLO that, of the members of the DTMLO, Paul ENGSTROM is the one who possesses large  
16 quantities of cryptocurrency, conducts large quantity cryptocurrency-for-cash transactions with the  
17 local cryptocurrency exchange BitLiquid and possesses extensive assets in the form of cars,  
18 motorcycles, rental properties, and land that was all likely purchased with drug proceeds. Further,  
19 EG3 has identified two cryptocurrency wallets in particular, belonging to ENGSTROM that he uses  
20 to manage his cryptocurrency. EG3 has discovered ENGSTROM’s use of cryptocurrency mixers or  
21 tumblers to disguise traceable cryptocurrency transactions to make them untraceable. EG3 has  
22 identified multiple bank accounts belonging to ENGSTROM that he uses to make large cash  
23 deposits and then pay for all of his assets.

1           2.       On January 28, 2021, EG3 surveilled ENGSTROM leaving the stash house with a  
2 backpack and drive directly to BitLiquid, Inc. located on Spring Mountain Road. ENGSTROM was  
3 then observed leaving BitLiquid, Inc. with an envelope in hand. EG3, through toll analysis on  
4 ENGSTROM's phone, was able to see that ENGSTROM communicated with Bit Liquid six times  
5 between 2:06pm and 2:21pm on that day. Further, EG3 was able to obtain Bit Liquid's crypto  
6 wallet that utilizes the Ethereum platform. EG3 queried Bit Liquid's wallet on etherscan.io (aka  
7 Etherscan) to search activity on the Ethereum Blockchain at approximately the time ENGSTROM  
8 was observed at BitLiquid. Based on the query, EG3 found that on January 28, 2021, at 4:58pm  
9 PST, 37,000 Paxos Standard, was sent from an unknown wallet to BitLiquid's wallet. The  
10 transaction amount was valued at \$37,000.00 USD. EG3 further confirmed the financial transaction  
11 verifying that on January 29, 2021, BitLiquid, in accordance with their obligations as a Money  
12 Transmitting Business, filed a Currency Transaction Report (CTR) for the transaction. The report  
13 noted that on January 28, 2021, BitLiquid provided cash in the amount of \$36,900.00 to  
14 ENGSTROM in exchange for cryptocurrency. EG3 believes the \$100 discrepancy is the  
15 commission amount received by BitLiquid as a fee for the transaction. EG3 was able to verify,  
16 based off the CTR, that the unknown wallet that transferred 37,000 PAX to BitLiquid's wallet was  
17 in fact ENGSTROM's wallet. Using this information, EG3 was able to use the wallet and  
18 additional CTR's filed by BitLiquid to confirm several large quantity cryptocurrency-for-cash  
19 transactions between ENGSTROM and BitLiquid.

20           3.       EG3's financial investigation of ENGSTROM has been unable to locate any  
21 legitimate sources of income for the large exchanges of cryptocurrency to cash and subsequent  
22 deposits being made by ENGSTROM. Employers in the state of Nevada are required to report  
23 employment income to the Nevada Department of Employment, Training & Rehabilitation

1 (DETR) for any employees in the state of Nevada for benefit purposes. EG3 subpoenaed Nevada  
2 DETR for employment records for ENGSTROM. Any reported employment for an individual  
3 would show up on DETR's "Wage Detail Report." Regarding the inquiry for Paul ENGSTROM,  
4 DETR reported that there was "no information available." No business entity operating in the state  
5 of Nevada pays ENGSTROM wages. Therefore, ENGSTROM's exchanges and deposits are  
6 proceeds from cocaine sales over the dark web.

7 4. Financial records from one bank account alone belonging to Paul ENGSTROM show  
8 15 incoming wires between January and June 2020 from BitLiquid, Inc., totaling \$273,025.00.  
9 Following these incoming wires, on June 12, 2020, ENGSTROM then transferred \$325,772.70 to  
10 Clear Title Company to purchase undeveloped land.

11 5. There are numerous examples that EG3 can give of ENGSTROM conducting large  
12 quantity cryptocurrency-for-cash exchanges with BitLiquid based off CTRs filed by BitLiquid and  
13 then in turn, making large purchases. During the first half of March alone BitLiquid filed CTRs on  
14 ENGSTROM for cryptocurrency-for-cash transactions four times: March 3, 2021 in the amount of  
15 \$80,000; March 6, 2021 in the amount of \$20,000; March 10, 2021 in the amount of \$50,000; and  
16 March 13, 2021 in the amount of \$50,000. On March 19, 2021, an 8300 was filed on ENGSTROM  
17 and another individual for putting \$20,000 down on a Dodge Ram pickup truck. On February 19,  
18 2021, BitLiquid filed a CTR on ENGSTROM for a cryptocurrency-for-cash transaction in the  
19 amount of \$60,000. On February 20, 2021, an 8300 was filed on ENGSTROM for the purchase of a  
20 Harley Davidson Motorcycle for \$43,000 in cash. On August 17, 2020, BitLiquid filed two CTRs on  
21 ENGSTROM for two cryptocurrency-for-cash transactions in the amount of \$14,960 and \$34,000.  
22 On August 20, 2020, an 8300 was filed on ENGSTROM for the purchase of a Harley Davidson  
23 Motorcycle in the amount of \$50,000 in cash.

1           6.       Your Complainant knows, based on training and experience, that “Insta” sells cocaine  
2 on the dark web for approximately three times the street value of cocaine in Las Vegas. Utilizing the  
3 same numbers included previously, but this time to calculate income, White House Market alone  
4 shows that “Insta” has made over 3,280 cocaine sales since February 1, 2020, until May 23, 2021.  
5 Based on the 2,310 buyer reviews from verified purchases on White House Market (as of May 23,  
6 2021), and assuming the remaining 970 sales were each for the minimum purchase of 3.5 grams of  
7 cocaine, a conservative estimate is that “Insta” has sold over twenty kilograms of cocaine for more  
8 than \$1.9 million in less than a four-month period (ending May 23, 2021). Further, White House  
9 Market imported feedback for “Insta” from other dark web marketplaces, showing a total of 7,562  
10 other confirmed completed sales.

11           7.       Your Complainant has already demonstrated that ENGSTROM receives large  
12 amounts of cryptocurrency through dark web cocaine sales. Cryptocurrency transactions can be  
13 traceable based on blockchain analysis. However, cryptocurrency users can use “mixers” or  
14 “tumblers” in order to mask their identities, especially if they are conducting illicit activities. On  
15 March 4, 2021, EG3 requested assistance from the DEA’s Operational Support Division, Cyber  
16 Support Section to provide analysis of two transactions conducted by ENGSTROM’s crypto wallets.  
17 Analysis revealed that ENGSTROM was utilizing coin swap services Changenow and Coinswitch to  
18 convert cryptocurrency from one form or multiple forms into PAX standard, a stable coin tethered to  
19 the US Dollar for stability. It is likely that ENGSTROM uses coin swap services specifically to avoid  
20 detection for his dark web activity.

21           8.       During the financial investigation, EG3 was able to identify BitLiquid’s  
22 cryptocurrency wallet. By analyzing BitLiquid’s wallet with CTR’s filed by BitLiquid, EG3 was able  
23 to identify two of ENGSTROM’s cryptocurrency wallets. Once the wallets were identified, EG3 was



able to analyze the transactions conducted on the two wallets. The first ENGSTROM wallet saw the cryptocurrency equivalent of approximately \$1.8 million dollars pass through it between August 2020 and February 2021. Approximately \$765,000 of it went to Bit Liquid in exchange for U.S. dollars. The second ENGSTROM wallet saw the cryptocurrency equivalent of approximately \$1.2 million dollars in inflows between February 2021 and April 2021. Approximately \$1.05 million dollars went to Bit Liquid in exchange for U.S. dollars.

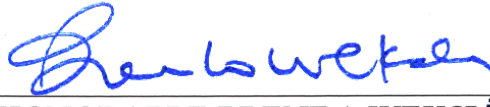
9. Based on my training and experience, your Complainant believes that ENGSTROM is obtaining large quantities of cryptocurrency through dark web cocaine sales. ENGSTROM is then exchanging his drug proceeds in the form of cryptocurrency for cash. ENGSTROM further cleans his drug proceeds by purchasing cars, motorcycles, land, etc.

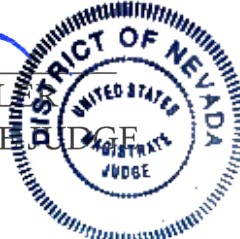
### CONCLUSION

Based on the aforementioned facts, your Complainant believes probable cause exists to believe that **PAUL ENGSTROM, VINCENT CUOMO, ABRAHAM ELLIOT and JOSEPH KRIEGER** committed offenses in violation of 21 U.S.C. § 846, 841(a)(1) and (b)(1)(A)(ii), Conspiracy to Distribute a Controlled Substance. In addition, your Complainant believes probable cause exists to believe that **PAUL ENGSTROM** also committed Money Laundering Conspiracy in violation of 18 U.S.C. § 1956(a)(1)(A)(i) and (h).

  
Daniel Kurinec, Special Agent  
Drug Enforcement Administration

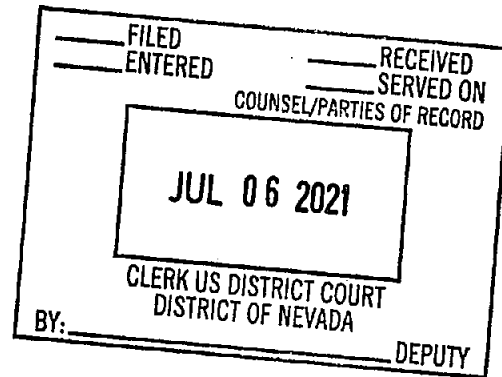
Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on June 22, 2021.

  
HONORABLE BRENDA WEKSLER  
UNITED STATES MAGISTRATE JUDGE





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8 *Attorneys for the United States*



9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 PAUL ENGSTROM,  
VINCENT CUOMO,  
15 ABRAHAM ELLIOTT, and  
JOSEPH KRIEGER,

16 Defendants.  
17  
18  
19  
20  
21

**CRIMINAL INDICTMENT**

Case No.: 2:21-cr- 190

**VIOLATIONS:**

21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A)(ii)  
– Conspiracy to Distribute a Controlled  
Substance;

21 U.S.C. §§ 841(a)(1) and (b)(1)(C) –  
Distribution of a Controlled Substance;

21 U.S.C. §§ 841(a)(1) and (b)(1)(A)(ii) –  
Possession with Intent to Distribute a  
Controlled Substance;

18 U.S.C. § 1956(a)(1)(A)(i), and (h) –  
Money Laundering Conspiracy

18 U.S.C. § 2 – Aiding and Abetting

22 **THE GRAND JURY CHARGES THAT:**  
23  
24

**COUNT ONE**

Conspiracy to Distribute a Controlled Substance  
(21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(A)(ii))

From a time unknown but no later than August 2019, and continuing to and including on or about June 21, 2021, in the State and Federal District of Nevada and elsewhere,

**PAUL ENGSTROM,  
VINCENT CUOMO,  
ABRAHAM ELLIOT and  
JOSEPH KRIEGER,**

defendants herein, and others known and unknown to the Grand Jury, knowingly combined, conspired, confederated, and agreed with each other to distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, all in violation of 21 United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A)(ii).

**COUNT TWO**

Distribution of a Controlled Substance  
(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))

On or about August 6, 2019, in the State and Federal District of Nevada,

**PAUL ENGSTROM,**

defendant herein, knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT THREE**

Distribution of a Controlled Substance  
(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) and 18 U.S.C. § 2)

On or about December 29, 2020, in the State and Federal District of Nevada,

1                   **PAUL ENGSTROM,**  
2                   **VINCENT CUOMO,**  
3                   **ABRAHAM ELLIOT and**  
4                   **JOSEPH KRIEGER,**

5 defendants herein, aiding and abetting one another, knowingly and intentionally  
6 distributed a mixture and substance containing a detectable amount of cocaine, a Schedule  
7 II controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1)  
8 and 841(b)(1)(C) and Title 18, United States Code, Section 2.

9                   **COUNT FOUR**

10                   Distribution of a Controlled Substance  
11                   (21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) and 18 U.S.C § 2)

12                   On or about March 29, 2021, in the State and Federal District of Nevada,

13                   **PAUL ENGSTROM,**  
14                   **VINCENT CUOMO,**  
15                   **ABRAHAM ELLIOT and**  
16                   **JOSEPH KRIEGER,**

17 defendants herein, aiding and abetting one another, knowingly and intentionally  
18 distributed a mixture and substance containing a detectable amount of cocaine, a Schedule  
19 II controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1)  
20 and 841(b)(1)(C) and Title 18, United States Code, Section 2.

21                   **COUNT FIVE**

22                   Distribution of a Controlled Substance  
23                   (21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), and 18 U.S.C. § 2)

24                   On or about May 10, 2021, in the State and Federal District of Nevada,

**PAUL ENGSTROM,**  
                  **VINCENT CUOMO,**  
                  **ABRAHAM ELLIOT and**  
                  **JOSEPH KRIEGER,**

defendants herein, aiding and abetting one another, knowingly and intentionally  
distributed a mixture and substance containing a detectable amount of cocaine, a Schedule

1 II controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1)  
2 and 841(b)(1)(C) and Title 18, United States Code, Section 2.

3 **COUNT SIX**

4 Distribution of a Controlled Substance  
(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), and 18 U.S.C. § 2)

5 On or about June 7, 2021, in the State and Federal District of Nevada,

6 **PAUL ENGSTROM,**  
7 **VINCENT CUOMO,**  
8 **ABRAHAM ELLIOT and**  
9 **JOSEPH KRIEGER,**

10 defendants herein, aiding and abetting one another, knowingly and intentionally distributed  
11 a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled  
12 substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and  
13 841(b)(1)(C) and Title 18, United States Code, Section 2.

14 **COUNT SEVEN**

15 Distribution of a Controlled Substance  
(21 U.S.C. §§ 841(a)(1), 841(b)(C) and 18 U.S.C. § 2)

16 On or about June 18, 2021, in the State and Federal District of Nevada,

17 **PAUL ENGSTROM,**  
18 **VINCENT CUOMO,**  
19 **ABRAHAM ELLIOT and**  
20 **JOSEPH KRIEGER,**

21 defendants herein, aiding and abetting one another, knowingly and intentionally  
22 distributed a mixture and substance containing a detectable amount of cocaine, a Schedule  
23 II controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1)  
24 and 841(b)(1)(C) and Title 18, United States Code, Section 2.

**COUNT EIGHT**

Possession with Intent to Distribute of a Controlled Substance  
(21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(ii), and 18 U.S.C. § 2)

On or about June 21, 2021, in the State and Federal District of Nevada,

1                                   **PAUL ENGSTROM,**  
2                                   **VINCENT CUOMO, and**  
3                                   **ABRAHAM ELLIOT,**

4 defendants herein, aiding and abetting one another, knowingly and intentionally possessed  
5 with intent to distribute 5 kilograms or more of a mixture and substance containing a  
6 detectable amount of cocaine, a Schedule II controlled substance, all in violation of Title  
7 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii) and Title 18, United States  
8 Code, Section 2.

9                                   **COUNT NINE**  
10                                  **(Money Laundering Conspiracy)**  
11                                  **(18 U.S.C. § 1956(h))**

12                   Beginning from a time unknown, and continuing to on or about June 21, 2021, in the  
13 State and Federal District of Nevada and elsewhere,

14                                   **PAUL ENGSTROM,**

15 defendant herein, together with others known and unknown to the Grand Jury, knowingly  
16 combined, conspired, and agreed with each other to commit the following offense against  
17 the United States:

18                   To knowingly move by wire and other means, in and affecting interstate commerce,  
19 funds constituting criminally derived property and derived from specified unlawful activity,  
20 namely conspiracy to distribute a controlled substance as charged in Count One of this  
21 Indictment, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), and  
22 (b)(1)(A)(ii), with the intent to conceal and disguise the nature, location, source, ownership,  
23 and control of the proceeds of that specific unlawful activity, in violation of Title 18, United  
24 States Code, Section 1956(a)(1)(B)(i), in violation of Title 18, United States Code, Section  
1956(h).

///  
5

**FORFEITURE ALLEGATION ONE**

Conspiracy to Distribute a Controlled Substance; Distribution of a Controlled Substance;  
and Possession with Intent to Distribute of a Controlled Substance

1. The allegations of Counts One through Eight of this Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) with 28 U.S.C. § 2461(c), 21 U.S.C. § 853(a)(1), 21 U.S.C. § 853(a)(2), 21 U.S.C. § 881(a)(4) with 28 U.S.C. § 2461(c), 21 U.S.C. § 881(a)(6) with 28 U.S.C. § 2461(c), and 21 U.S.C. § 881(a)(7) with 28 U.S.C. § 2461(c).

2. Upon conviction of any of the felony offenses charged in Counts One through Eight of this Criminal Indictment,

**PAUL ENGSTROM,  
VINCENT CUOMO,  
ABRAHAM ELLIOT and  
JOSEPH KRIEGER,**

defendants herein, shall forfeit to the United States of America, any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of 21 U.S.C. § 841(a)(1), a specified unlawful activity as defined in 18 U.S.C. §§ 1956(c)(7)(A) and 1961(1)(D), or 21 U.S.C. § 846, conspiracy to commit such offense:

defendants herein, shall forfeit to the United States of America, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of violations of 21 U.S.C. §§ 841(a)(1) and 846:

defendants herein, shall forfeit to the United States of America, any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of a violation of 21 U.S.C. §§ 841(a)(1) and 846:

defendants herein, shall forfeit to the United States of America, all conveyances, including aircraft, vehicles, or vessels, which are used, or are intended for use, to transport, or in any manner to facilitate the transportation, sale, receipt, possession, or concealment of

property described in 21 U.S.C. § 881(a)(1), (2), and (9), in violation of 21 U.S.C. §§ 841(a)(1) and 846:

defendants herein, shall forfeit to the United States of America, all moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished in exchange for a controlled substance or listed chemical in violation of 21 U.S.C. §§ 841(a)(1) and 846, all proceeds traceable to such an exchange, and all moneys, negotiable instruments, and securities used or intended to be used to facilitate any violation of 21 U.S.C. §§ 841(a)(1) and 846:

defendants herein, shall forfeit to the United States of America, all real property, including any right, title, and interest (including leasehold interest) in the whole of any lot or tract of land and any appurtenances or improvements, which is used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, a violation of 21 U.S.C. §§ 841(a)(1) and 846:

1. any and all property with the requisite nexus to violations of 21 U.S.C. §§ 841(a)(1) and 846 pursuant to the forfeiture statutes in this forfeiture allegation and Fed. R. Crim. P. 32.2(b)(2)(C); and
2. an in personam criminal forfeiture money judgment including, but not limited to, at least \$2,000,000 (all of which constitutes property).
3. If any property being subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) with 28 U.S.C. § 2461(c), 21 U.S.C. § 853(a)(1), 21 U.S.C. § 853(a)(2), 21 U.S.C. § 881(a)(4) with 28 U.S.C. § 2461(c), 21 U.S.C. § 881(a)(6) with 28 U.S.C. § 2461(c), and 21 U.S.C. § 881(a)(7) with 28 U.S.C. § 2461(c), as a result of any act or omission of the defendants –

- 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 of America, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendants for the property listed above.

All pursuant to 18 U.S.C. § 981(a)(1)(C) with 28 U.S.C. § 2461(c), 21 U.S.C. §§ 841(a)(1), 846, and 853(a)(1), 853(a)(2), and 853(p), 21 U.S.C. § 881(a)(4) with 28 U.S.C. § 2461(c), 21 U.S.C. § 881(a)(6) with 28 U.S.C. § 2461(c), and 21 U.S.C. § 881(a)(7) with 28 U.S.C. § 2461(c).

#### **FORFEITURE ALLEGATION TWO**

Conspiracy to Distribute a Controlled Substance; Distribution of a Controlled Substance;  
and Possession with Intent to Distribute of a Controlled Substance

1. The allegations of Counts One through Eight of this Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 924(d)(1) with 28 U.S.C. § 2461(c) and 21 U.S.C. § 881(a)(11) with 28 U.S.C. § 2461(c).

2. Upon conviction of any of the felony offenses charged in Counts One through Eight of this Criminal Indictment,

**PAUL ENGSTROM,  
VINCENT CUOMO,  
ABRAHAM ELLIOT and  
JOSEPH KRIEGER,**



1 defendants herein, shall forfeit to the United States of America, any firearm or  
 2 ammunition involved in or used in any violation of any other criminal law of the United  
 3 States, 21 U.S.C. §§ 841(a)(1) and 846:

4 defendants herein, shall forfeit to the United States of America, any firearm used or  
 5 intended to be used to facilitate the transportation, sale, receipt, possession, or concealment  
 6 of property described in 21 U.S.C. § 881(a)(1) and 881(a)(2), in violation of 21 U.S.C. §§  
 7 841(a)(1) and 846 and any proceeds traceable to such property:

- 8 1. Freedom arms revolver S/N A45471 and 9 rounds .22LR;
- 9 2. Sig Sauer P365 S/N 66A766963 with magazine and ammunition;
- 10 3. Sig P232 S/N S294501;
- 11 4. Smith & Wesson revolver S/N J242872;
- 12 5. Taurus Int'l Revolver S/N ACB558557;
- 13 6. Springfield Armory XD40 pistol S/N US243348;
- 14 7. Ruger LCR revolver S/N 541-18881;
- 15 8. Diamondback AR-15 5.56 NATO S/N DB2450094;
- 16 9. M1 Garand with Scope S/N 451989;
- 17 10. HK AR-15 .22 LR HV S/N HB027724;
- 18 11. Remington 1100 Shotgun S/N R238133W;
- 19 12. Mossberg International 715P .22 cal AR pistol S/N euf4483633;
- 20 13. CD Defense 12GA semi-automatic Shotgun S/N 20SA12P7522;
- 21 14. Savage Model 116 S/N J303376;
- 22 15. Diamondback AR-15 5.56 NATO S/N DB2472231;
- 23 16. Diamondback AR-15 5.56 NATO S/N db2022845; and
- 24 17. any and all compatible ammunition.

1 All pursuant to 18 U.S.C. § 924(d)(1) with 28 U.S.C. § 2461(c), 21 U.S.C. §§  
 2 841(a)(1) and 846, and 21 U.S.C. § 881(a)(11) with 28 U.S.C. § 2461(c).

3 **FORFEITURE ALLEGATION THREE**

4 Conspiracy to Distribute a Controlled Substance; Distribution of a Controlled Substance;  
 5 and Possession with Intent to Distribute of a Controlled Substance

6 1. The allegations of Counts One through Eight of this Criminal Indictment are  
 7 hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture  
 8 pursuant to 18 U.S.C. § 924(d)(1), (2)(C), and (3)(B) with 28 U.S.C. § 2461(c).

9 2. Upon conviction of any of the felony offenses charged in Counts One through  
 10 Eight of this Criminal Indictment,

11 **PAUL ENGSTROM,  
 12 VINCENT CUOMO,  
 13 ABRAHAM ELLIOT and  
 14 JOSEPH KRIEGER,**

15 defendants herein, shall forfeit to the United States of America, any firearm or  
 16 ammunition intended to be used in any offense punishable under the Controlled Substances  
 17 Act, 21 U.S.C. §§ 841(a)(1) and 846:

- 18 1. Freedom arms revolver S/N A45471 and 9 rounds .22LR;
- 19 2. Sig Sauer P365 S/N 66A766963 with magazine and ammunition;
- 20 3. Sig P232 S/N S294501;
- 21 4. Smith & Wesson revolver S/N J242872;
- 22 5. Taurus Int'l Revolver S/N ACB558557;
- 23 6. Springfield Armory XD40 pistol S/N US243348;
- 24 7. Ruger LCR revolver S/N 541-18881;
8. Diamondback AR-15 5.56 NATO S/N DB2450094;
9. M1 Garand with Scope S/N 451989;
10. HK AR-15 .22 LR HV S/N HB027724;

11. Remington 1100 Shotgun S/N R238133W;
12. Mossberg International 715P .22 cal AR pistol S/N euf4483633;
13. CD Defense 12GA semi-automatic Shotgun S/N 20SA12P7522;
14. Savage Model 116 S/N J303376;
15. Diamondback AR-15 5.56 NATO S/N DB2472231;
16. Diamondback AR-15 5.56 NATO S/N db2022845; and
17. any and all compatible ammunition.

All pursuant to 18 U.S.C. § 924(d)(1), (2)(C), and (3)(B) with 28 U.S.C. § 2461(c) and 21 U.S.C. §§ 841(a)(1) and 846.

**FORFEITURE ALLEGATION FOUR**  
Money Laundering Conspiracy

1. The allegations contained in Count Nine of this Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) with 28 U.S.C. § 2461(c), 18 U.S.C. § 981(a)(1)(C) with 28 U.S.C. § 2461(c), and 18 U.S.C. § 982(a)(1).

2. Upon conviction of the felony offense charged in Count Nine of this Criminal Indictment,

**PAUL ENGSTROM,**

defendant herein, shall forfeit to the United States of America, any property, real or personal, involved in transactions or attempted transactions in violation of 18 U.S.C. § 1956(a)(1)(B)(i) and 18 U.S.C. § 1956(h), or any property traceable to such property:

defendant herein, shall forfeit to the United States of America, any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of 18 U.S.C. § 1956(a)(1)(B)(i), a specified unlawful activity as defined in 18 U.S.C. §§ 1956(c)(7)(A) and 1961(1)(B), or 18 U.S.C. § 1956(h), conspiracy to commit such offense:

1 defendant herein, shall forfeit to the United States of America, any property, real or  
 2 personal, involved in a violation of 18 U.S.C. § 1956(a)(1)(B)(i) and 18 U.S.C. § 1956(h), or  
 3 any property traceable to such property:

4 1. any and all property with the requisite nexus to violations of 18 U.S.C. §  
 5 1956(a)(1)(B)(i) and 18 U.S.C. § 1956(h) pursuant to the forfeiture statutes in this  
 6 forfeiture allegation and Fed. R. Crim. P. 32.2(b)(2)(C); and

7 2. an in personam criminal forfeiture money judgment including, but not limited to, at  
 8 least \$2,000,000

9 (all of which constitutes property).

10 3. If any property subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) with 28  
 11 U.S.C. § 2461(c), 18 U.S.C. § 981(a)(1)(C) with 28 U.S.C. § 2461(c), and 18 U.S.C. §  
 12 982(a)(1), as a result of any act or omission of the defendant-

13 a. cannot be located upon the exercise of due diligence;

14 b. has been transferred or sold to, or deposited with, a third party;

15 c. has been placed beyond the jurisdiction of the court;

16 d. has been substantially diminished in value; or

17 e. has been commingled with other property which cannot be divided without  
 18 difficulty;

19 it is the intent of the United States of America, pursuant to 21 U.S.C. § 853(p), to seek  
 20 forfeiture of any other property of the defendant for the property listed above.


1 All pursuant to 18 U.S.C. § 981(a)(1)(A) with 28 U.S.C. § 2461(c), 18 U.S.C. §  
2 981(a)(1)(C) with 28 U.S.C. § 2461(c), 18 U.S.C. § 982(a)(1), 18 U.S.C. § 1956(a)(1)(B)(i),  
3 18 U.S.C. § 1956(h), and 21 U.S.C. § 853(p).

4  
5 **DATED:** this 6<sup>th</sup> day of July, 2021.

6 **A TRUE BILL:**

7  
8 /S/  
FOREPERSON OF THE GRAND JURY

9  
10 CHRISTOPHER CHIOU  
Acting United States Attorney

11  
12 By   
13 SUSAN CUSHMAN  
14 CHRISTOPHER BURTON  
DANIEL CLARKSON  
Assistant United States Attorneys

15 Attorneys for Plaintiff  
16 UNITED STATES OF AMERICA  
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