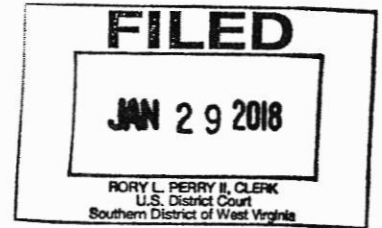


UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF WEST VIRGINIA  
BECKLEY



UNITED STATES OF AMERICA

v.

CRIMINAL NO.

5:18-00010  
18 U.S.C. § 1956(h)

JOHN PELLEGRINI, D.O.

I N F O R M A T I O N

The United States Attorney Charges:

From on or about November 2010 through October 31, 2012, in Beckley, Raleigh County, West Virginia, in the Southern District of West Virginia and elsewhere, defendant JOHN PELLEGRINI, D.O., and others known and unknown to the United States Attorney, did knowingly conspire with each other to conduct and attempt to conduct financial transactions affecting interstate commerce, which transactions involved the proceeds of a specified unlawful activity, that is, the illegal distribution of Schedule II controlled substances outside the usual course of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. § 841(a)(1), and conspiracy to unlawfully distribute Schedule II controlled substances outside the usual course of professional practice and not for a legitimate medical purpose, in

violation of 21 U.S.C. § 846, with the intent to promote the carrying on of such specified unlawful activity, and while conducting and attempting to conduct such financial transactions, knew the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(A)(i).

In violation of Title 18, United States Code, Section 1956(h).

**FORFEITURE**

In accordance with 18 U.S.C. § 982(a) and Rule 32.2(a) of the Federal Rules of Criminal Procedure, and premised upon the conviction of the defendant Pelligrini of a violation of 18 U.S.C. § 1956(h), as set forth in this Information, defendant Pelligrini shall forfeit to the United States any property, real or personal, involved in the said offense, and any property traceable to property involved in the offense, including but not limited to the following:

The sum of \$574,507, more or less, in United States currency in that such sum in aggregate constitutes the gross proceeds derived by the defendant from the conspiracy during the period alleged in the Information.

**NOTICE OF INTENT TO FORFEIT SUBSTITUTE ASSETS**

The United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) and 28 U.S.C. § 2461(c). In the event any of the forgoing property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third person;

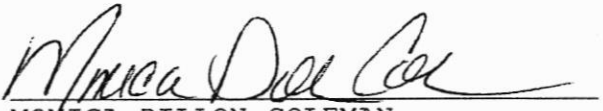
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be subdivided without difficulty;


it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) and 18 U.S.C. § 982(a)(1), to seek forfeiture of any other property of said defendant up to the value of said property listed above as being subject to forfeiture.

UNITED STATES OF AMERICA

MICHAEL B. STUART  
United States Attorney

By:

  
MONICA DILLON COLEMAN  
Assistant United States Attorney

  
MEREDITH GEORGE THOMAS  
Assistant United States Attorney