

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)
)
) No. 13 CR 689
)
) Violation: Title 21, United States Code,
) Section 963
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)

The UNITED STATES ATTORNEY charges:

1. At times material to this information:

 a. From in or about January 2011 to in or about October 2013, an underground website known as “Silk Road” allowed vendors and buyers to exchange goods and services online. Silk Road was dedicated to the sale of illegal drugs and other illicit, black market goods and services using the digital currency “bitcoins” and was designed to facilitate illegal commerce by ensuring anonymity among its users.

 b. Defendant CORNELIS JAN SLOMP, who used the username “SuperTrips” to sell illegal drugs on Silk Road, was a citizen and resident of the Netherlands. SLOMP used Silk Road to sell millions of dollars’ worth of illegal drugs and received approximately 385,000 in bitcoins across more than 10,000 transactions as payment for his illegal drug sales. In total, for the eighteen months from in or about March 2012 through in or about August 2013, SLOMP distributed worldwide approximately: 104 kilograms of powder 3,4-methylenedioxy-N-

methylamphetamine (MDMA); 566,000 ecstasy pills containing MDMA; four kilograms of cocaine; three kilograms of Benzodiazepine; and substantial quantities of amphetamine, lysergic acid diethylamide (LSD), and marijuana, in addition to allowing for substantial quantities of methamphetamine, ketamine, and Xanax to be distributed on his SuperTrips vendor account.

c. Individual A and Individual B resided in the Netherlands, took instructions and directions from defendant CORNELIS JAN SLOMP, and otherwise assisted SLOMP to run his illegal online drug operation.

d. Individual C, Individual D, Individual E, Individual F, and Individual G were among defendant CORNELIS JAN SLOMP's wholesale sources of supply for illegal drugs.

e. Individual H and Individual I resided in the Netherlands and manufactured kilogram quantities of ecstasy pills for defendant CORNELIS JAN SLOMP using powder MDMA that SLOMP provided to them.

f. Individual J resided in Florida, operated on Silk Road under the usernames "UnderGroundSyndicate" and "BTCMaster," and took instructions and directions from defendant CORNELIS JAN SLOMP, with whom Individual J partnered to run an illegal drug operation online.

g. Individual K resided in Florida and assisted Individual J to run an illegal drug operation and took instructions and directions from Individual J and defendant CORNELIS JAN SLOMP.

2. Beginning in or around March 2012 and continuing through in or about August 2013, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

CORNELIS JAN SLOMP,

defendant herein, conspired with others known and unknown to:

- knowingly and intentionally import into the United States from a place outside the United States a controlled substance, namely, a quantity of MDMA, a Schedule I Controlled Substance; 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance; and a quantity of Benzodiazepine, a Schedule IV Controlled Substance, in violation of Title 21, United States Code, Section 952(a); and
- manufacture and distribute a controlled substance, namely, a quantity of MDMA, a Schedule I Controlled Substance, knowing that such substance would be unlawfully imported into the United States, in violation of Title 21, United States Code, Section 959(a)(2);

all in violation of Title 21, United States Code, Section 963.

3. It was part of the conspiracy that defendant CORNELIS JAN SLOMP obtained multi-kilogram quantities of MDMA, Benzodiazepine, and other illegal drugs from at least four wholesale suppliers located in Europe, namely, Individuals C, D, E, and F, and multi-kilogram quantities of cocaine from another wholesale supplier located in Chicago, namely, Individual G, which drugs SLOMP, assisted by others, including Individual A and Individual B, both of whom took instructions and directions from SLOMP and agreed to assist SLOMP in distributing illegal drugs, further broke down into distribution and user quantities and knowingly imported into the United States, including into the Northern District of Illinois, from the

Netherlands and Germany.

4. It was further part of the conspiracy that defendant CORNELIS JAN SLOMP provided Individuals H and I, who had agreed to assist SLOMP in manufacturing and distributing illegal drugs, with kilogram quantities of powder MDMA that Individuals H and I manufactured for SLOMP into hundreds of thousands of ecstasy pills of different colors, including red, white, green, and pink, most of which bore SLOMP's unique identifying logo, namely, a question mark, knowing that a large percentage of these ecstasy pills would be unlawfully imported into the United States.

5. It was further part of the conspiracy that defendant CORNELIS JAN SLOMP, assisted by others, including Individual A and Individual B, both of whom took instructions and directions from SLOMP and agreed to assist SLOMP in distributing illegal drugs, advertised and marketed SLOMP's illegal drugs on Silk Road, and used kilogram quantities of MDMA, cocaine, Benzodiazepine, and other illegal drugs to process and fulfill customer orders for wholesale redistribution quantities as well as personal use quantities of illegal drugs ordered from SLOMP's Silk Road SuperTrips vendor account.

6. It was further part of the conspiracy that defendant CORNELIS JAN SLOMP, assisted by others, including Individual A and Individual B, both of whom took instructions and directions from SLOMP and agreed to assist SLOMP in distributing illegal drugs, packaged and shipped both wholesale redistribution

quantities and personal use quantities of MDMA, cocaine, Benzodiazepine, and other illegal drugs from Germany and the Netherlands to customers and others located in the United States, the Northern District of Illinois, and elsewhere, to fulfill wholesale redistribution and personal use customer orders for illegal drugs SLOMP received on his Silk Road SuperTrips vendor account.

7. It was further part of the conspiracy that in or around August 2012, defendant CORNELIS JAN SLOMP entered into an arrangement with Individual J, in which SLOMP “fronted” wholesale quantities of illegal drugs to Individual J, meaning that SLOMP provided Individual J with illegal drugs on credit with the understanding that Individual J would split in half the proceeds from Individual J’s resale of those illegal drugs to his/her own customers.

8. It was further part of the conspiracy that pursuant to defendant CORNELIS JAN SLOMP’s arrangement with Individual J, SLOMP, with the assistance of others, including Individual A and Individual B, both of whom took instructions and directions from SLOMP and agreed to assist SLOMP in distributing illegal drugs, packaged, shipped, and imported into the United States approximately one-half kilogram of fronted MDMA every week for one year, as well as a total of two additional kilograms of fronted cocaine and one kilogram of fronted Benzodiazepine, all for the benefit of Individual J, who in turn and together with Individual K, processed, packaged, shipped, and fulfilled customer orders for illegal drugs submitted to the UnderGroundSyndicate and BTCMaster accounts from Silk

Road users located across the United States, including in the Northern District of Illinois.

9. It was further part of the conspiracy that upon establishing a drug-trafficking partnership with Individual J, defendant CORNELIS JAN SLOMP provided Individual J with his unique logon information and paid Individual J to access his SuperTrips account so that Individual J and Individual K, both of whom spoke better English than SLOMP, could provide account and customer-support services on SLOMP's Silk Road account, including responding to customer questions and complaints.

10. It was further part of the conspiracy that defendant CORNELIS JAN SLOMP communicated on private Silk Road chats with Individuals J, K, and others regarding their illegal drug-trafficking activities.

11. It was further part of the conspiracy that at times, defendant CORNELIS JAN SLOMP sent Individual J bitcoins generated from Silk Road drug transactions to convert into cash and also agreed for Individual J to hold on to SLOMP's portion of illegal drug proceeds that Individual J generated as SLOMP's largest wholesale re-distributor of illegal drugs in the United States until SLOMP was ready to pick up those proceeds.

12. It was further part of the conspiracy that in or around August 2013, defendant CORNELIS JAN SLOMP traveled from the Netherlands to the United States, specifically, to Florida, to meet with Individuals J and K to spin off

SLOMP's entire United States-based Silk Road operations, including his United States customers, to Individual J, as well as to pick up his share of the illegal drug proceeds Individual J generated as SLOMP's largest wholesale re-distributor in the United States of fronted illegal drugs.

13. It was further part of the conspiracy that defendant CORNELIS JAN SLOMP and his co-conspirators misrepresented, concealed, and hid, and caused to be misrepresented, concealed, and hidden, the acts and the purposes of the acts done in furtherance of the conspiracy.

In violation of Title 21, United States Code, Section 963.

FORFEITURE ALLEGATION

The UNITED STATES ATTORNEY alleges:

1. The allegations contained in this Information are incorporated here for the purpose of alleging that certain property is subject to forfeiture to the United States pursuant to the provisions of Title 21, United States Code, Section 853.

2. As a result of his violation of Title 21, United States Code, Section 963, as alleged in this Information,

CORNELIS JAN SLOMP,

defendant herein, shall forfeit to the United States of America, pursuant to Title 21, United States Code, Sections 853(a)(1) and (2): (1) any and all property constituting and derived from any proceeds the defendants obtained, directly and indirectly, as a result of said violations; and (2) any and all property used, and intended to be used, in any manner or part to commit and to facilitate the commission of said violations.

3. The interests of the defendant subject to forfeiture to the United States pursuant to Title 21, United States Code, Section 853, include, but are not limited to, not less than \$3,030,000 in United States currency constituting proceeds of the defendant's illegal drug-trafficking activities.

4. By virtue of the defendant's commission of the offenses charged in this Information, all right, title or interest that the defendant has in the above-described property is vested in the United States and hereby forfeited to the United States pursuant to Title 21, United States Code, Section 853.

5. If any of the forfeitable property described above as being subject to forfeiture pursuant to Title 21, United States Code, Section 853(a), 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 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 subdivided without difficulty,

it is the intent of the United States, pursuant to the provisions of Title 21, United States Code, Section 853(p), to seek forfeiture of substitute property belonging to the defendant, pursuant to Title 21, United States Code, Section 853.

UNITED STATES ATTORNEY