

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.  
 :  
 v. : Crim. No. 14-  
 :  
 JESSE WILLIAM KORFF : 18 U.S.C. §§ 175(a), 554(a), and 956(a)

**INFORMATION**

The defendant having waived in open court prosecution by indictment, and any objections as to venue, the United States Attorney for the District of New Jersey charges:

**Counts 1 - 5**  
**(Production, Transfer, and Possession  
of a Toxin for Use as a Weapon)**

**Background**

1. At all times relevant to this Information:
  - a. Defendant JESSE WILLIAM KORFF was a resident of Labelle, Florida.
  - b. “Black Market Reloaded” (“BMR”) was an illicit, Internet-based marketplace which provided a sales platform enabling vendors and buyers who were users of the site to conduct anonymous transactions online. Many of these transactions involved the sale of illegal and harmful goods, including but not limited to biological agents, toxins, chemicals, firearms, ammunition, explosives, controlled substances, and counterfeit goods.

c. The primary form of payment used on the BMR website was a form of digital currency known as Bitcoin. Bitcoin was a decentralized form of electronic currency, existing entirely on the Internet and not in any physical form. The currency was not issued by any government, bank, or company, but rather was generated and controlled automatically through computer software operating on a “peer to peer” network. Bitcoin transactions were processed collectively by the computers composing the network. BMR’s payment system essentially consisted of a Bitcoin “bank” internal to the website, where BMR users maintained an account in order to conduct transactions on the site.

d. Defendant JESSE WILLIAM KORFF maintained a vendor profile and Bitcoin account on BMR under the screen alias name “Snowman840,” which he utilized to market and to ultimately sell various illicit goods, including ricin and abrin for use as a weapon, to purchasers worldwide in exchange for Bitcoins.

e. Ricin was a highly toxic protein that naturally occurred in the seeds of castor oil plants (*ricinus communis*). A lethal dose of ricin could be extracted from these seeds.

f. Abrin was a highly toxic protein that naturally occurred in the seeds of the rosary pea plant (*abrus precatorius*). A lethal dose of abrin could be extracted from these seeds.

g. Ricin and abrin were toxins as defined in 18 U.S.C. § 178(2), and were listed as select agents by the United States Department of Health and Human Services (“HHS”). Select agents and toxins were a subset of biological agents and toxins that the HHS and the United States Department of

Agriculture (“USDA”) have determined to have the potential to pose a severe threat to public health and safety.

h. Defendant JESSE WILLIAM KORFF purchased, acquired or otherwise obtained a variety of items necessary for his development, production, transfer and possession of ricin and abrin for use as a weapon, including, among other things, quantities of castor bean and rosary pea seeds, laboratory equipment, computer equipment, manuals, packaging supplies, and materials related to the extraction, dispersal, transfer and possession of said toxins.

#### The Defendant’s Marketing and Sales Activities

2. Beginning in or about August 2013 through in or about January 2014, defendant JESSE WILLIAM KORFF used his vendor profile on BMR to advertise his sale of toxins for use as a weapon on BMR. Defendant JESSE WILLIAM KORFF created a vendor listing on BMR in which he marketed ricin under the descriptive heading, “Top of the Line Ricin Poison.”

3. Defendant JESSE WILLIAM KORFF’s marketing efforts on BMR contained descriptions of the ricin’s intended effectiveness, including, among other statements, “[T]his ricin is dissolved in water preferably for injection or possibly for putting in someones [sic] cigarette filter ... if injected with this the target will start feeling symptoms in 2-3 days and die by the forth [sic]. [T]his poison is completely untraceable. [T]hey will also die a horrible death.”

4. Defendant JESSE WILLIAM KORFF sold quantities of ricin and abrin for use as a weapon to various international purchasers. The purchasers

paid for the toxins by transferring Bitcoins to defendant JESSE WILLIAM KORFF's BMR-based Bitcoin account.

5. Defendant JESSE WILLIAM KORFF utilized the United States Postal Service in order to ship international deliveries of toxins to India, Austria, Denmark and England.

6. Defendant JESSE WILLIAM KORFF was apprehended on or about January 18, 2014, following his attempt to ship a quantity of abrin from Labelle, Florida, through New Jersey, en route to a destination in Ontario, Canada.

7. Samples of liquids taken from vials seized from defendant JESSE WILLIAM KORFF in connection with this investigation have been subsequently analyzed and found to contain detectable amounts of active toxins, to wit, ricin and abrin.

#### The Charges

8. On or about the dates specified below, in connection with the activities outlined above, in the District of New Jersey and elsewhere, defendant

JESSE WILLIAM KORFF

knowingly developed, produced, stockpiled, transferred, acquired, retained, and possessed a toxin, as defined by Title 18, United States Code, Section 178(2), to wit, ricin and abrin, for use as a weapon, and attempted to do the same, as follows:

<b>Count</b>	<b>Date</b>	<b>Toxin Produced, Transferred and Possessed</b>	<b>Location of Transfer from Florida</b>
1	September 2, 2013	Ricin	New Delhi, India
2	October 25, 2013	Ricin	Vienna, Austria
3	December 4, 2013	Abrin	London, England
4	December 19, 2013	Abrin	Ryomgand, Denmark
5	January 15, 2014	Abrin	Ontario, Canada

All in violation of Title 18, United States Code, Section 175(a).

**Counts 6 - 10**  
**(Smuggling Toxins from the United States)**

9. The allegations set forth in paragraphs 1 through 7 of this Information are reiterated as if set forth at length.

10. On or about the dates specified below, in connection with the activities outlined above, in the District of New Jersey and elsewhere, defendant

**JESSE WILLIAM KORFF**

did fraudulently and knowingly export and send from the United States, and attempt to export and send from the United States, merchandise, articles, and objects, including toxins, as defined by Title 18, United States Code 178(2), to wit, ricin and abrin, the possession and transfer of which are prohibited under Title 18, United States Code, Section 175(a), and did receive, conceal, buy, sell and in any manner facilitate the transportation, concealment, and sale of such merchandise, articles and objects, prior to exportation, knowing the same to be intended for exportation, as follows:

<b><u>Count</u></b>	<b><u>Date</u></b>	<b>Toxin Produced, Transferred and Possessed</b>	<b>Location of Transfer from Florida</b>
6	September 2, 2013	Ricin	New Delhi, India
7	October 25, 2013	Ricin	Vienna, Austria
8	December 4, 2013	Abrin	London, England
9	December 19, 2013	Abrin	Ryomgand, Denmark
10	January 15, 2014	Abrin	Ontario, Canada

All in violation of Title 18, United States Code, Section 554(a).

**Count 11**  
**(Conspiring to Kill, Maim, or Injure  
a Person in a Foreign Country)**

11. The allegations set forth in paragraphs 1 through 7 of this Information are reiterated as if set forth at length.

**The Conspiracy**

12. From in or around November 2013, through on or about January 18, 2014, in the District of New Jersey, and elsewhere, defendant

JESSE WILLIAM KORFF

did, within the jurisdiction of the United States, knowingly and intentionally conspire and agree with others to commit at a place outside the United States an act that would constitute the offense of murder if committed in the special maritime and territorial jurisdiction of the United States, and did commit an act within the jurisdiction of the United States to effect the object of the conspiracy.

**Object of the Conspiracy**

13. It was the object of the conspiracy for defendant JESSE WILLIAM KORFF to produce and transfer a toxin, as defined by Title 18, United States Code, Section 178(2), to wit, abrin, to a co-conspirator located in London, England, which abrin was to be utilized by the co-conspirator to poison and murder an individual located in London, England.

**Manner and Means of the Conspiracy**

14. It was part of the conspiracy that defendant JESSE WILLIAM KORFF utilized his BMR vendor profile "Snowman840" to market and advertise the sale of illicit toxins online.

15. It was a further part of the conspiracy that defendant JESSE WILLIAM KORFF utilized the BMR website and other anonymous, internet based, encrypted communication servers to conduct negotiations with a BMR purchaser located in London, England, utilizing the vendor profile "Headgear123" (the co-conspirator, referred to herein as "CC"), for the sale of a quantity of abrin.

16. It was a further part of the conspiracy that defendant JESSE WILLIAM KORFF agreed to sell a quantity of abrin to CC for the equivalent of approximately \$700 (U.S.) in Bitcoin.

17. It was a further part of the conspiracy that defendant JESSE WILLIAM KORFF provided instructions to CC in order to secretly and effectively administer the abrin to CC's intended victim.

18. It was a further part of the conspiracy that CC provided defendant JESSE WILLIAM KORFF with a shipping address in London, England, for the secure shipment of the abrin.

19. It was a further part of the conspiracy that JESSE WILLIAM KORFF mailed an initial quantity of abrin to CC in London, England.

20. It was a further part of the conspiracy that defendant JESSE WILLIAM KORFF, while in the United States, agreed to ship a second dose of abrin to CC at a location in London, England, in order to further assist CC in the implementation of the plan to poison and murder CC's intended victim.

Overt Acts

21. In furtherance of the conspiracy, and to effect its unlawful object, defendant JESSE WILLIAM KORFF committed and caused to be committed the following overt acts in the Middle District of Florida and elsewhere:

a. On or about December 4, 2013, defendant JESSE WILLIAM KORFF developed and produced a quantity of abrin for sale and transfer to CC.

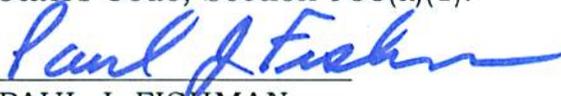
b. On or about December 4, 2013, defendant JESSE WILLIAM KORFF packaged a quantity of abrin in a glass vial, which he then secreted inside a hollowed-out wax candle for secure shipment to CC.

c. On or about December 4, 2013, defendant JESSE WILLIAM KORFF obtained packing material and prepared the abrin for shipment to CC.

d. On or about December 4, 2013, defendant JESSE WILLIAM KORFF mailed a package containing a quantity of abrin via United States Postal Services from Florida to CC at an address in London, England.

e. In or about January 2014, defendant JESSE WILLIAM KORFF prepared, packaged, stored and possessed at his home in Florida a second quantity of abrin which he intended to ship to CC in London, England, in order to further assist with the implementation of CC's murder plot.

In violation of Title 18, United States Code, Section 956(a)(1).

  
PAUL J. FISHMAN  
United States Attorney

**CASE NUMBER: 14-**

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**v.**

**JESSE WILLIAM KORFF**

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**INFORMATION FOR**

18 U.S.C. §§ 175(a), 554(a), and 956(a)

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