

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X  
:  
UNITED STATES OF AMERICA :  
:  
- v. - : SUPERSEDING INFORMATION  
:  
CHARLIE SHREM, : S1 14 Cr. 243 (JSR)  
:  
Defendant. :  
:  
- - - - - X

COUNT ONE

(Aiding and Abetting the Operation of an  
Unlicensed Money Transmitting Business)

The United States Attorney charges:

1. From in or about January 2012, up to and including in or about October 2012, in the Southern District of New York and elsewhere, CHARLIE SHREM, the defendant, knowingly and willfully did aid and abet Robert M. Faiella, a/k/a "BTCKing," in conducting, controlling, managing, supervising, directing, and owning all and part of a money transmitting business affecting interstate and foreign commerce, to wit, a Bitcoin exchange service Faiella operated on the "Silk Road" website under the username "BTCKing," which (i) failed to comply with the money transmitting business registration requirements set forth in Title 31, United States Code, Section 5330, and the regulations prescribed thereunder, and (ii) otherwise involved the transportation and transmission of funds known to SHREM to

have been intended to be used to promote and support unlawful activity, to wit, narcotics trafficking on the "Silk Road" website, in violation of Title 21, United States Code, Sections 812, 841, and 846.

(Title 18, United States Code, Sections 1960 and 2.)

**FORFEITURE ALLEGATION**

2. As a result of committing the offense alleged in Count One of this Information, CHARLIE SHREM, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), all property, real and personal, involved in the offense and all property traceable to such property.

**Substitute Asset Provision**

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b) and Title 21, United States

Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.

(Title 18, United States Code, Section 982;  
Title 21, United States Code, Section 853.)

*Preet Bharara*

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PREET BHARARA *PT*

United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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CHARLIE SHREM,

Defendants.

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INFORMATION

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(18 U.S.C. §§ 1960 & 2)

PREET BHARARA  
Foreperson. United States Attorney.

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