

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY
NORTHERN DIVISION
ASHLAND**

Eastern District of Kentucky
FILED
MAY 28 2020
AT LONDON
ROBERT R. CARR
CLERK U.S. DISTRICT COURT

UNITED STATES OF AMERICA

V.

INDICTMENT NO. 0:20-CR-08-DLB

JOSHUA AARON VALLANCE

* * * * *

THE GRAND JURY CHARGES:

**COUNT 1
18 U.S.C. § 1956(h)**

1. From at least January 1, 2014, through June 10, 2015, in Boyd County, in the Eastern District of Kentucky and elsewhere,

JOSHUA AARON VALLANCE

and others known and unknown, knowingly combined, conspired, confederated, and agreed with others to commit offenses against the United States in violation of Title 18, United States Code, Sections 1956(a)(1), 1956(a)(2), and 1957, to wit:

- a. knowingly conducting and attempting to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, violations of Title 18, United States Code, Sections 1343 and 1349, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location,

source, ownership, and control of the proceeds of said specified unlawful activity in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i);

- b. knowingly transporting, transmitting, and transferring, and attempting to transport, transmit, and transfer monetary instruments and funds from a place in the United States to or through a place outside the United States, knowing that the instruments and funds represent the proceeds of some form of unlawful activity and that the transportation was designed in whole and part to conceal or disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, that is, Title 18, United States Code, Sections 1343 and 1349, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i); and
- c. knowingly engage and attempt to engage, in monetary transactions by, through, and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, that is wire transfers and monetary instruments, such property having been derived from a specified unlawful activity, that is, wire fraud, in violation of Title 18, United States Code, Section 1957.

Manner and Means

2. The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

- 3. VALLANCE'S co-conspirators defrauded individuals into sending funds

under a number of false pretenses made via interstate wire communication.

4. VALLANCE, either personally or through those he hired locally, received the funds from the victims.

5. Once VALLANCE received victim funds, which he knew to be the proceeds of wire fraud, he would convert those funds to bitcoin to send back to the co-conspirator who had perpetrated the underlying fraud, while also retaining a portion of those funds as payment and commission. VALLANCE often converted his payment and commission into valuable items, such as silver bars and personal luxury items.

6. On occasion, he transferred funds by, to, or through a financial institution in excess in \$10,000.

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

FORFEITURE ALLEGATION
18 U.S.C. § 982(a)(1)

1. The above allegations are herein incorporated for the purpose of alleging forfeiture.

2. In committing the offense alleged above, the same being punishable by imprisonment for more than one year, **JOSHUA AARON VALLANCE** shall forfeit to the United States pursuant to 18 U.S.C. § 982(a)(1) any property involved in the offense or any property traceable to such property, including but not limited to the currency and real property listed below.

MONEY JUDGMENT:

A money judgment which represents the proceeds this defendant obtained as a

result of the above offense.

3. If any of the property described above, as a result of any act or omission of **JOSHUA AARON VALLANCE**:

- 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 has been commingled

with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to 21 U.S.C. § 853 and 18 U.S.C. § 982(a)(1).

A TRUE BILL


ROBERT M. DUNCAN, JR.
UNITED STATES ATTORNEY

PENALTIES

COUNT 1: Not more than 20 years imprisonment, \$500,000 fine (or twice the gross gain or loss), and 3 years supervised release.

PLUS: Mandatory special assessment of \$100.

PLUS: Restitution, if applicable.