

FILED

Sep 27 2022

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

1 STEPHANIE M. HINDS (CABN 154284)
United States Attorney

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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11 UNITED STATES OF AMERICA,) CASE NO. CR22-374 JSC
12 Plaintiff,)
13 v.) VIOLATIONS: 18 U.S.C. § 1343 – Wire Fraud; 18
14 RYAN MARK GINSTER,) U.S.C. § 981(a)(1)(C), 28 U.S.C. § 2461(c) –
15 Defendant.) Criminal Forfeiture
16) SAN FRANCISCO VENUE
17)

18 INFORMATION

19 The United States Attorney charges:

20 COUNT ONE: (18 U.S.C. § 1343 – Wire Fraud)

21 On the dates set forth below, in the Northern District of California and elsewhere, the defendant,
22 RYAN MARK GINSTER

23 Knowingly, and with the intent to defraud, participated in, devised, and intended to devise a scheme and
24 artifice to defraud as to a material matter, and to obtain money and property by means of materially false
25 and fraudulent pretenses, representations, and promises, and by means of omission and concealment of
26 material facts.

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1 FORFEITURE ALLEGATIONS: (18 U.S.C. § 981(a)(1)(C); 28 U.S.C. § 2461(c))

2 The allegations contained in the sole count of this Information are re-alleged and incorporated by
3 reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section
4 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

5 Upon conviction of the offense set forth in this Information, the defendant,

6 **RYAN MARK GINSTER,**

7 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and
8 Title 28, United States Code, Section 2461(c), a forfeiture Money Judgment in the amount of
9 \$1,878,722.78 (the value of 98.12089739 bitcoins as of September 26, 2022), as well as the following
10 property:

- 11 **a.** Funds totaling \$130,225.69 seized from Carrollton Bank Account, account
12 number ending in 0022;
- 13 **b.** Funds totaling \$103,423.94 seized from an account at Coinbase, Inc., associated
14 with an account number ending in 0090;
- 15 **c.** Cryptocurrencies seized from an account at Coinbase, Inc., account number
16 ending in 0090, including: .5 OMG; .7 KNC (Kyber Network Crystal);
17 2.05834621 BTC (Bitcoin); .006 DASH (Dash Coin); .25672100 XLM (Stellar
18 Lumens); .070291 REP (Augers Reputation Tokens); .99 XTZ (Tez); .00884331
19 BSV (Bitcoin SV); .00160000 ZEC (ZCash); 1.58340000 ZRX (Ox); .03106781
20 ETC (Ethereum Classic).
- 21 **d.** The cryptocurrency contained in an Electrum cryptocurrency wallet seized on
22 February 23, 2021 from files on GINSTER's home computer, including
23 59.65924748 BTC (Bitcoin);
- 24 **e.** The cryptocurrency contained in an Exodus cryptocurrency wallet containing
25 DASH (Dash Coin), ETH (Ethereum), and LTC (Litecoin) cryptocurrencies,
26 seized on February 23, 2021 from files on GINSTER's home computer;
27 specifically 8.7461006 DASH; 49.798059 ETH; and 71.499593 LTC;
- 28 **f.** The cryptocurrency contained on an Atomic Wallet, containing ETH (Ethereum),

1 BTC (Bitcoin), BCH (Bitcoin Cash), ALGO (Algorand), DASH (Dash Coin), and
2 AWC (Atomic Wallet Coin); cryptocurrencies, seized on February 23, 2021 from
3 files on GINSTER's home computer; specifically 279.656626718529 ETH;
4 0.80018724 BTC; 3.40445288 BCH; 95,701.279423 ALGO; 13.31771828
5 DASH; 28,434.57611336 AWC; 0.77268794 BTC (Bitcoin); and

- 6 g. The cryptocurrency contained on an Atomic Wallet seized on February 23, 2021
7 from files on GINSTER's home computer containing 6,008.255885 ATOM
8 (Cosmos Cryptocurrency).

9 If any of the property described above, as a result of any act or omission of the defendant:

- 10 a. cannot be located upon the exercise of due diligence;
11 b. has been transferred or sold to or deposited with, a third person;
12 c. has been placed beyond the jurisdiction of the Court;
13 d. has been substantially diminished in value; or
14 e. has been commingled with other property which cannot be divided without
15 difficulty;

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

18 All pursuant to Title 18, United States Code, Section 924(d), Title 28, United States Code,
19 Section 2461(c), and Federal Rule of Criminal Procedure 32.2.

20
21
22 DATED: September 26, 2022_____

STEPHANIE M. HINDS
United States Attorney

23
24 /s/ David Ward
25 DAVID J. WARD
Assistant United States Attorney
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Sep 27 2022

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

CRIMINAL COVER SHEET

Instructions: Effective November 1, 2016, this Criminal Cover Sheet must be completed and submitted, along with the Defendant Information Form, for each new criminal case.

CASE NAME:

USA v. RYAN MARK GINSTER

CASE NUMBER:

CR CR22-374 JSC

Is This Case Under Seal?

Yes No

Total Number of Defendants:

1 2-7 8 or more

Does this case involve ONLY charges under 8 U.S.C. § 1325 and/or 1326?

Yes No

Venue (Per Crim. L.R. 18-1):

SF OAK SJ

Is this a potential high-cost case?

Yes No

Is any defendant charged with a death-penalty-eligible crime?

Yes No

Is this a RICO Act gang case?

Yes No

Assigned AUSA

(Lead Attorney): David J. Ward

Date Submitted: September 26, 2022

Comments:

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

18 U.S.C. § 1343 – Wire Fraud

- Petty
- Minor
- Misdemeanor
- Felony

PENALTY: 20 years imprisonment; \$250,000 fine; three years' supervised release; \$100 special assessment; restitution; forfeiture.

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

DEFENDANT - U.S.

▶ RYAN MARK GINSTER

DISTRICT COURT NUMBER
CR22-374 JSC

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

this is a reprosecution of charges previously dismissed which were dismissed on motion of:
 U.S. ATTORNEY DEFENSE

SHOW DOCKET NO.

this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person Furnishing Information on this form STEPHANIE M. HINDS

U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) AUSA David J. Ward

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

1) If not detained give date any prior summons was served on above charges ▶

2) Is a Fugitive

3) Is on Bail or Release

IS IN CUSTODY

4) On this charge

5) On another conviction

Federal State

6) Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer been filed? Yes No

} If "Yes" give date filed

DATE OF ARREST ▶ Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY ▶ Month/Day/Year

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This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT

Bail Amount: _____

If Summons, complete following:

Arraignment Initial Appearance

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

Date/Time: _____ Before Judge: _____

Comments: