

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 19-
	:	
WILLIAM GREEN	:	18 U.S.C. § 1960
	:	18 U.S.C. § 982(a)(1)

**INDICTMENT**

The Grand Jury, in and for the District of New Jersey, sitting at Newark, charges:

**Count One**  
**(Operating an Unlicensed Money Transmitting Business)**

1. At all times relevant to this Indictment:

a. Defendant WILLIAM GREEN was a resident of the State of New Jersey and maintained a website business under the name "Destination Bitcoin." Through the Destination Bitcoin website, defendant GREEN operated a business wherein he received money from members of the public (the "customers"), deposited such money into bank accounts maintained by GREEN, and then converted such money into Bitcoin in accordance with the customers' instructions. Defendant GREEN charged the customers a fee for this service.

b. Federal law provided that "[a]ny person who owns or controls a money transmitting business shall register the business (whether or not the business is licensed as a money transmitting business in any State) with the Secretary of the Treasury...." 31 U.S.C. § 5330(a)(1).

**FORFEITURE ALLEGATION**

1. As a result of committing the offense in violation of 18 U.S.C. § 1960 alleged in this Indictment, defendant GREEN shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), all property, real and personal, involved in such offense, and all property traceable to such property.

**Substitute Assets Provision**

2. If any of the property described above, 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 divided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of such defendant up to the value of the forfeitable property described above.

A TRUE BILL

Grand Jury Foreperson

  
CRAIG CARPENITO  
UNITED STATES ATTORNEY

CASE NUMBER: 19-

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**United States District Court  
District of New Jersey**

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**UNITED STATES OF AMERICA**

v.

**WILLIAM GREEN**

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**INDICTMENT FOR**

18 U.S.C. § 1960  
18 U.S.C. § 982(a)(1)

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**A True Bill.**

**Foreperson**

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**CRAIG CARPENITO**  
*UNITED STATES ATTORNEY*  
*NEWARK, NEW JERSEY*

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ANTHONY P. TORNTORE  
*ASSISTANT U.S. ATTORNEY*  
973-645-2726

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