

UNITED STATES DISTRICT COURT
 DISTRICT OF SOUTH CAROLINA
 COLUMBIA DIVISION

UNITED STATES OF AMERICA)
)
 v.)
)
)
)
 JOSEPH PATRICK GELLI)

CRIMINAL NO. 3:15cr 86
 18 U.S.C. § 2
 18 U.S.C. § 1956(a)(1)(A)(i)
 18 U.S.C. § 1956(h)

INDICTMENT

COUNTS 1-11

THE GRAND JURY CHARGES:

Between on or about the dates listed below, in the District of South Carolina, the defendant, **JOSEPH PATRICK GELLI**, did knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, to wit: making cash deposits into his personal bank account and using the deposited funds for the purchase of the software-based, online currency commonly referred to as Bitcoin, which involved the proceeds of a specified unlawful activity, that is, the manufacture, importation, sale, and distribution of controlled substances, with the intent to promote the carrying on of the specified unlawful activity, to wit: the manufacture, importation, sale, and distribution of controlled substances, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity:

<u>Count</u>	<u>Dates of Transactions</u>	<u>Value of Bitcoin</u>
1	8/16/13-8/20/13	\$1,739.24
2	8/19/13-8/21/13	\$2,182.02

<u>Count</u>	<u>Dates of Transactions</u>	<u>Value of Bitcoin</u>
3	9/23/13-9/24/13	\$1,011.64
4	11/18/13-11/20/13	\$2,411.91
5	12/2/13-12/2/13	\$2,013.33
6	1/23/14-1/23/14	\$4,137.21
7	2/10/14-2/11/14	\$2,184.66
8	3/18/14-3/20/14	\$3,085.30
9	4/21/14-4/22/14	\$2,269.42
10	5/23/14-5/27/14	\$3,719.32
11	5/30/14-6/2/14	\$4,662.23

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 2.

COUNT 12

THE GRAND JURY FURTHER CHARGES:

From in or about June 2013 through in or about July 2014, in the District of South Carolina and elsewhere, the defendant, **JOSEPH PATRICK GELLI**, and others known and unknown to the grand jury, did knowingly combine, conspire, and agree with each other and with other persons known and unknown to the Grand Jury, to conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is, the manufacture, importation, sale, and distribution of controlled substances, with the intent to promote the carrying on of specified unlawful activity, that is, the manufacture, importation, sale, and distribution of controlled substances, and that while conducting and attempting to conduct such financial transactions knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i);

MANNER AND MEANS

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

- a. The manufacture, importation, sale, and distribution of controlled substances;
- b. The pooling by the defendant and others known and unknown to the grand jury of the proceeds of the manufacture, importation, sale, and distribution of a controlled substances;

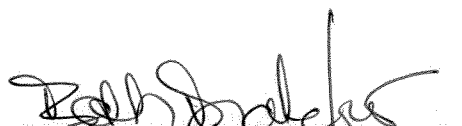
- c. The deposit of the proceeds of the manufacture, importation, sale, and distribution of a controlled substance into the defendant, **JOSEPH PATRICK GELLI's** personal bank account;
- d. The categorization by **JOSEPH PATRICK GELLI** to the bank that the deposits represented lawful payments earned through **JOSEPH PATRICK GELLI's** legitimate employment as a pizza delivery driver;
- e. The use of the deposited funds to purchase the software based, online currency commonly referred to as Bitcoin through the vendor www.coinbase.com;
- f. The use of the Bitcoins to purchase additional controlled substances through various internet sites for further importation, sale and distribution;

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

A TRUE BILL

Redacted

FOREPERSON


WILLIAM N. NETTLES (TDP)
UNITED STATES ATTORNEY