

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	Criminal No. 23cr10325
)	
v.)	Violation:
)	
MICHAEL THOMPSON,)	<u>Count One:</u>
a/k/a “VZZNBuilder1”,)	Conspiracy to Commit Market Manipulation
)	(18 U.S.C. § 371)
)	
Defendant)	<u>Forfeiture Allegation:</u>
)	(18 U.S.C. § 981(a)(1)(C) and
)	28 U.S.C. § 2461)
)	

INFORMATION

At all times relevant to this Information:

General Allegations

1. Defendant MICHAEL THOMPSON (“THOMPSON”), also known as “VZZNBuilder1”, lived in Virginia.
2. Co-conspirator 1 (“CC 1”) lived in Texas.
3. In or about 2023, THOMPSON and CC 1 created VZZN, a cryptocurrency company. VZZN promoted a cryptocurrency token that operated on the Ethereum blockchain (the “VZZN Token”). VZZN purported to create a video streaming service that could be used with the VZZN Token. The VZZN Token was a security that was not registered on a national exchange.

Overview of the Conspiracy

4. Beginning in or about January 2023 and continuing through at least in or about December 2023, THOMPSON and CC 1 conspired with others known and unknown to the U.S.

Attorney to artificially inflate the price of VZZN Tokens through manipulative trading and false and misleading statements.

Object and Purpose of the Conspiracy

5. The object of the conspiracy was to commit market manipulation. The purpose of the conspiracy was for the defendant and his coconspirators to enrich themselves.

Manner and Means of the Conspiracy

6. Among the manner and means by which THOMPSON, CC 1 and others known and unknown to the U.S. Attorney carried out the conspiracy were the following:

- a. Soliciting investors to buy VZZN Tokens through the VZZN website and social media platforms such as Twitter and YouTube;
- b. Making false and misleading statements about VZZN and VZZN Tokens;
- c. Engaging in manipulative trading of VZZN Tokens to create the appearance of legitimate trading volume;
- d. Inducing others to buy VZZN Tokens based on the false and misleading statements and the manipulative trading, with the intent to inflate the price of VZZN Tokens artificially so that THOMPSON, CC 1, and their co-conspirators could sell VZZN Tokens they controlled at a profit; and
- e. Coordinating their activities through encrypted messaging applications such as WhatsApp and Telegram.

Overt Acts in Furtherance of the Conspiracy

7. Between in or about January 2023 and in or about December 2023, THOMPSON, CC 1, and others known and unknown to the U.S. Attorney committed and caused to be committed the following overt acts, among others, in furtherance of the conspiracy:

a. Beginning on or about February 8, 2023, THOMPSON and CC 1 advertised VZZN as a cryptocurrency company on the VZZN website.

b. On or about May 4, 2023, THOMPSON sent CC 1 a WhatsApp message stating, “In crypto I’m learning that yes it’s always about value, but in the meantime until you have actual value, the optics of value can carry you a long way”.

c. On or about July 2, 2023, CC 1 published a promotion for “VZZNTOKEN” claiming “Announcements INCOMING”.

d. On or about July 26, 2023, THOMPSON, using the Twitter account VZZNBuilder1, published a promotion for an upcoming “Networking Event” for “VZZN”.

e. On or about October 13, 2023, THOMPSON and CC 1 solicited investments for VZZN during a video conference call.

f. On or about October 24, 2023, THOMPSON and CC 1 solicited investments for VZZN during a video conference call.

g. On or about November 2, 2023, THOMPSON and CC 1 traveled to Massachusetts to solicit investments for VZZN.

h. On or about November 15, 2023, THOMPSON and CC 1 exchanged WhatsApp messages in which they discussed their manipulative trades of VZZN Tokens. For example:

- i. CC 1 stated, “Will do few buys now get some hype”.
- ii. THOMPSON responded, “Yeeesssiirrrr goooooooooo”.
- iii. CC 1 then stated, “Now organic buys coming in” and “Not my first rodeo lol. I may know a thing or two about what I’m doing on occasion. Now you’ll see narrative switch on social media”.
- iv. THOMPSON responded, “Maaaaaan you are the CRYPTO MESSIAH for REEEAALLL”.

i. On or about November 28, 2023, CC 1 called an individual in Massachusetts to request help correcting a technical issue with the VZZN Token.

j. On or about December 5, 2023, THOMPSON and CC 1 participated in a Telegram conference call in which they discussed their plan to make manipulative trades of VZZN Tokens. For example:

- i. CC 1 stated, “I’m going to create a self-inflicted pump and create FOMO [Fear of Missing Out] on my own[...] What that does is create the appearance of a massive buy wall. And that’s how you generate FOMO.”
- ii. In response to a question about whether CC 1 had sufficient manpower to create a self-inflicted pump and “FOMO”, CC 1 stated, “It is a one-person thing. It takes me and my laptop. That’s it[...] I got a hundred different wallets I can create and do all that shit with.”

iii. In response to a question about whether THOMPSON was part of the self-inflicted pump and creating “FOMO”, THOMPSON stated, “I’m a part of everything. Literally anything that needs to happen to make it happen, that’s where I am.”

k. On or about December 8, 2023, THOMPSON travelled to Massachusetts with the intent to obtain a cash investment for VZZN.

l. On or about December 9, 2023, CC 1 traveled to Massachusetts with the intent to obtain a cash investment for VZZN.

COUNT ONE
Conspiracy To Commit Market Manipulation
(18 U.S.C. § 371)

The U.S. Attorney charges:

8. The U.S. Attorney re-alleges and incorporates by reference paragraphs 1 through 7(l) of this Information.

9. From at least in or about January 2023 to in or about December 2023, in the District of Massachusetts and elsewhere, the defendant,

MICHAEL THOMPSON, a/k/a “VZZNBuilder1”

conspired with CC 1 and others known and unknown to the U.S. Attorney to:

a. commit market manipulation, that is, knowingly and willfully, by the use of the mails and any means and instrumentality of interstate commerce, directly and indirectly to effect a series of transactions in a security not registered on a national exchange, to wit, the VZZN Token, creating actual and apparent active trading in such security, and raising and depressing the price of such security, for the purpose of inducing the purchase and sale of such security by others, in violation of Title 15, United States Code, Sections 78i(a)(2) and 78ff(a).

All in violation of Title 18, United States Code, Section 371.

FORFEITURE ALLEGATION
(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

10. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Section 371, relating to conspiracy to commit market manipulation, as set forth in Count One, the defendant,

MICHAEL THOMPSON, a/k/a “VZZNBuilder1”

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses.

11. If any of the property described in Paragraph 10, above, as being forfeitable pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), 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 intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 10 above.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

JOSHUA S. LEVY
Acting U.S. Attorney

By: *Christopher J. Markham*
CHRISTOPHER J. MARKHAM
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December 21, 2023