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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
TERESA MCGRATH,  
  
Defendant.

CR No. 20-136(A)-AB

F I R S T  
S U P E R S E D I N G  
I N F O R M A T I O N

[21 U.S.C. § 846: Conspiracy to Distribute and Possess With Intent to Distribute Methamphetamine and MDMA; 18 U.S.C. § 1956(h): Conspiracy to Launder Monetary Instruments; 18 U.S.C. § 924(c)(1)(A)(i): Possession of Firearms in Furtherance of a Drug Trafficking Crime; 21 U.S.C. § 853, 18 U.S.C. §§ 924 and 982, 28 U.S.C. § 2461(c): Criminal Forfeiture]

The United States Attorney charges:

COUNT ONE

[21 U.S.C. § 846]

A. OBJECTS OF THE CONSPIRACY

Beginning on a date unknown and continuing until on or about February 11, 2020, in Los Angeles County, within the Central District of California, defendant TERESA MCGRATH, and others known and unknown to the United States Attorney, conspired with each other to knowingly

1 and intentionally distribute and possess with intent to distribute  
2 the following:

3 1. at least 50 grams of methamphetamine, a Schedule II  
4 controlled substance, in violation of Title 21, United States Code,  
5 Sections 841(a)(1), (b)(1)(A)(viii); and

6 2. 3,4-methylenedioxymethamphetamine ("MDMA"), in violation of  
7 Title 21, United States Code, Sections 841(a)(1), (b)(1)(C).

8 B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE  
9 ACCOMPLISHED

10 The objects of the conspiracy were to be accomplished, in  
11 substance, as follows:

12 1. Co-conspirators would obtain methamphetamine and MDMA from  
13 sources of supply.

14 2. Defendant MCGRATH would assist with the packaging of  
15 methamphetamine and MDMA for distribution by U.S. mail to customers  
16 who ordered that methamphetamine and MDMA on the dark web.

17 3. Defendant MCGRATH would mail parcels containing  
18 methamphetamine and MDMA by U.S. mail to customers who ordered that  
19 methamphetamine and MDMA on the dark web.

20 C. OVERT ACTS

21 In furtherance of the conspiracy and to accomplish the objects  
22 of the conspiracy, on or about the following date, defendant MCGRATH,  
23 and others known and unknown to the United States Attorney, committed  
24 various overt acts in Los Angeles County, within the Central District  
25 of California, and elsewhere, including, but not limited to, the  
26 following:

1           1.    On February 28, 2019, defendant MCGRATH dropped off several  
2 packages containing methamphetamine for shipment by U.S. mail to  
3 customers who ordered those drugs on the dark web.

4           2.    On July 8, 2019, defendant MCGRATH dropped off  
5 approximately 60 packages containing drugs, including  
6 methamphetamine, for shipment by U.S. mail to customers who ordered  
7 those drugs on the dark web.

8           3.    On February 11, 2020, defendant MCGRATH possessed, with  
9 intent to distribute, approximately 22.183 kilograms of  
10 methamphetamine and 6.701 kilograms of MDMA.

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COUNT TWO

[18 U.S.C. § 1956(h)]

A. OBJECT OF THE CONSPIRACY

Beginning on a date unknown and continuing until on or about February 11, 2020, in Los Angeles County, within the Central District of California, defendant TERESA MCGRATH, and others known and unknown to the United States Attorney, conspired with each other to knowingly conduct financial transactions knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, which, in fact, involved the proceeds of specific unlawful activity, namely, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 846, and 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 in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE ACCOMPLISHED

The object of the conspiracy was to be accomplished, in substance, as follows:

1. Defendant MCGRATH and other co-conspirators would funnel money, including proceeds from narcotics-related activities, into a digital currency account held in the name of defendant MCGRATH (the "MCGRATH Bitcoin Account").

2. Defendant MCGRATH and other co-conspirators would exchange digital currency into fiat currency then transfer those funds into another bank account held in the name of defendant MCGRATH (the "MCGRATH Bank of America Account").

1           3.     Defendant MCGRATH would withdraw funds from the MCGRATH  
2 Bank of America Account.

3 C.     OVERT ACTS

4           In furtherance of the conspiracy and to accomplish the object of  
5 the conspiracy, on or about the following dates, defendant MCGRATH,  
6 and others known and unknown to the United States Attorney, committed  
7 various overt acts in Los Angeles County, within the Central District  
8 of California, and elsewhere, including, but not limited to, the  
9 following:

10           1.     On December 21, 2018, defendant MCGRATH opened the MCGRATH  
11 Bitcoin Account.

12           2.     On March 27, 2019, defendant MCGRATH received \$9,945.49 in  
13 Bitcoin in the MCGRATH Bitcoin Account.

14           3.     On March 27, 2019, defendant MCGRATH exchanged \$9,954.18 in  
15 Bitcoin to U.S. dollars.

16           4.     On March 27, 2019, defendant MCGRATH transferred \$9,999  
17 from the MCGRATH Bitcoin Account to the MCGRATH Bank of America  
18 Account.

19           5.     On April 2, 2019, defendant MCGRATH withdrew \$9,300 from  
20 the MCGRATH Bank of America Account.

21           6.     On May 23, 2019, defendant MCGRATH withdrew \$8,888 from the  
22 MCGRATH Bank of America Account.

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COUNT THREE

[18 U.S.C. § 924(c)(1)(A)(i)]

On or about February 11, 2020, in Los Angeles County, within the Central District of California, defendant TERESA MCGRATH knowingly possessed the following firearms in furtherance of a drug trafficking crime, namely, conspiracy to distribute and possess with intent to distribute methamphetamine, in violation of Title 21, United States Code, Section 846, as charged in Count One of this Information:

- (1) a Glock pistol, bearing serial number NRU539;
- (2) a Glock pistol, bearing serial number GMZ799; and
- (3) an FNH pistol, bearing serial number GKU0127246.

FORFEITURE ALLEGATION ONE

[21 U.S.C. § 853]

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3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal  
4 Procedure, notice is hereby given that the United States of America  
5 will seek forfeiture as part of any sentence, pursuant to Title 21,  
6 United States Code, Section 853 and Title 28, United States Code,  
7 Section 2461(c), in the event of the defendant's conviction of the  
8 offense set forth in Count One of this First Superseding Information.

9 2. The defendant, if so convicted, shall forfeit to the United  
10 States of America the following:

11 (a) All right, title and interest in any and all property,  
12 real or personal, constituting or derived from, any proceeds which  
13 the defendant obtained, directly or indirectly, from any such  
14 offense;

15 (b) All right, title and interest in any and all property,  
16 real or personal, used, or intended to be used, in any manner or  
17 part, to commit, or to facilitate the commission of any such offense;

18 (c) All right, title, and interest in any firearm or  
19 ammunition involved in or used in any such offense, including but not  
20 limited to the following:

- 21 i. One Glock pistol, bearing serial number NRU539;  
22 ii. One Glock pistol, bearing serial number GMZ799;  
23 iii. One FNH pistol, bearing serial number GKU0127246;

24 and

25 (d) To the extent such property is not available for  
26 forfeiture, a sum of money equal to the total value of the property  
27 described in subparagraphs (a), (b), and (c).

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1           3. Pursuant to Title 21, United States Code, Section 853(p),  
2 the defendant, if so convicted, shall forfeit substitute property if,  
3 by any act or omission of the defendant, the property described in  
4 the preceding paragraph, or any portion thereof: (a) cannot be  
5 located upon the exercise of due diligence; (b) has been transferred,  
6 sold to, or deposited with a third party; (c) has been placed beyond  
7 the jurisdiction of the court; (d) has been substantially diminished  
8 in value; or (e) has been commingled with other property that cannot  
9 be divided without difficulty.

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FORFEITURE ALLEGATION TWO

[18 U.S.C. § 982 and 28 U.S.C. § 2461(c)]

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3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal  
4 Procedure, notice is hereby given that the United States will seek  
5 forfeiture as part of any sentence, pursuant to Title 18, United  
6 States Code, Section 982(a)(1) and Title 28, United States Code,  
7 Section 2461(c), in the event of the defendant's conviction of the  
8 offense set forth in Count Two of this First Superseding Information.

9 2. The defendant, if so convicted, shall forfeit to the United  
10 States of America the following:

11 (a) Any property, real or personal, involved in such  
12 offense, and any property traceable to such property; and

13 (b) To the extent such property is not available for  
14 forfeiture, a sum of money equal to the total value of the property  
15 described in subparagraph (a).

16 3. Pursuant to Title 21, United States Code, Section 853(p), as  
17 incorporated by Title 18, United States Code, Section 982(b)(1), and  
18 Title 18, United States Code, Section 982(b)(2), the defendant, if so  
19 convicted, shall forfeit substitute property, if, by any act or  
20 omission of the defendant, the property described in the preceding  
21 paragraph, or any portion thereof: (a) cannot be located upon the  
22 exercise of due diligence; (b) has been transferred, sold to, or  
23 deposited with a third party; (c) has been placed beyond the  
24 jurisdiction of the court; (d) has been substantially diminished in  
25 value; or (e) has been commingled with other property that cannot be  
26 divided without difficulty. Substitution of assets shall not be  
27 ordered, however, where the convicted defendant acted merely as an  
28 intermediary who handled but did not retain the property in the

1 course of the money laundering offense unless the defendant, in  
2 committing the offense or offenses giving rise to the forfeiture,  
3 conducted three or more separate transactions involving a total of  
4 \$100,000.00 or more in any twelve-month period.

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FORFEITURE ALLEGATION THREE

[18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c)]

1 Pursuant to Rule 32.2 of the Federal Rules of Criminal  
2 Procedure, notice is hereby given that the United States of America  
3 will seek forfeiture as part of any sentence, pursuant to Title 18,  
4 United States Code, Section 924(d)(1), and Title 28, United States  
5 Code, Section 2461(c), in the event of the defendant's conviction of  
6 the offense set forth in Count Three of this First Superseding  
7 Information.

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10 2. The defendant, if so convicted, shall forfeit to the United  
11 States of America the following:

12 (a) All right, title, and interest in any firearm or  
13 ammunition involved in or used in any such offense, including but not  
14 limited to the following:

15 i. One Glock pistol, bearing serial number NRU539;

16 ii. One Glock pistol, bearing serial number GMZ799;

17 iii. One FNH pistol, bearing serial number GKU0127246;

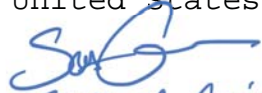
18 and

19 (b) To the extent such property is not available for  
20 forfeiture, a sum of money equal to the total value of the property  
21 described in subparagraph (a).

22 3. Pursuant to Title 21, United States Code, Section 853(p),  
23 as incorporated by Title 28, United States Code, Section 2461(c), the  
24 defendant, if so convicted, shall forfeit substitute property, up to  
25 the value of the property described in the preceding paragraph if, as  
26 the result of any act or omission of the defendant, the property  
27 described in the preceding paragraph or any portion thereof (a)  
28 cannot be located upon the exercise of due diligence; (b) has been

1 transferred, sold to, or deposited with a third party; (c) has been  
2 placed beyond the jurisdiction of the court; (d) has been  
3 substantially diminished in value; or (e) has been commingled with  
4 other property that cannot be divided without difficulty.

5 NICOLA T. HANNA  
6 United States Attorney

7   
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9 *Deputy Chief, Criminal Division*  
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