ALC/SDD:TAD/MEB/CEJ/DKK
F. #2017R001656

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----------X

UNITED STATES OF AMERICA

- against -

JOSEPH P. WILLNER,

Defendant.

----------X

INDICTMENT

CR 17 - 620

(T. 15, U.S.C., §§ 78j(b) and 78ff; T. 18, U.S.C., §§ 371, 981(a)(1)(C), 982(a)(1), 982(a)(2), 982(b)(1), 1030(i), 1349, 1956(h), 2 and 3551 et seq.; T. 21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

DeARCY HALL, J.
TISCIONE, M.J.

THE GRAND JURY CHARGES:

INTRODUCTION

At all times relevant to this Indictment, unless otherwise indicated:

I. The Defendant and a Relevant Co-Conspirator

1. The defendant JOSEPH P. WILLNER was a United States citizen residing in Ambler, Pennsylvania, who identified himself to at least one brokerage firm as a day trader.

2. Co-Conspirator 1, an individual whose identity is known to the Grand Jury, was a foreign national.

II. Relevant Principles and Definitions

3. A "security" was, among other things, any note, stock, bond, debenture, evidence of indebtedness, investment contract or participation in any profit-sharing agreement.

4. A "buy order" was an order to purchase a security.

5. A "sell order" was an order to sell a security.

6. A "short sale order" was a particular type of stock sale order where the stock trader agreed to sell a security that the stock trader did not presently own. Because the stock trader did not own the particular security, the stock trader had to borrow it. Typically, in order to borrow the particular security, the stock trader held a cash "margin" account at a brokerage firm and used that account as collateral to borrow the security. In borrowing the security, the stock trader agreed to sell the borrowed stock at a specified price in the future.

7. "Covering a short" referred to buying back borrowed securities to close an open short position. Covering a short involved purchasing the exact same security that one initially sold short. If a stock trader was able to cover a short sale at a price less than the short sale price, the stock seller would make money—specifically, the difference between the short sale price and the cover price.

8. "Regular trading hours" and "regular trading days" referred to the time period from 9:30 a.m. to 4:00 p.m.,[1] from Monday through Friday, excluding applicable holidays, during which most stock trading on major stock exchanges in the United States occurred. Major stock exchanges included the New York Stock Exchange and the Nasdaq Stock Market.

9. "Pre-market trading" referred to the period of trading activity that occurred before regular trading hours. The pre-market trading session typically spanned from approximately 4:00 a.m. to 9:30 a.m. on regular trading days.

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[1] All times referenced herein are in Eastern Time.

10. "After-hours trading" referred to the period of trading activity that occurred after regular trading hours. The after-hours trading session typically spanned from 4:00 p.m. to 8:00 p.m. on regular trading days.

11. "Bitcoin" was a type of digital currency, also referred to as a virtual currency or crypto-currency.

12. "Coinbase" was an online platform that allowed users to convert government-backed currency, for example, United States dollars, to bitcoin, and to send and receive payments in bitcoin.

13. An "Internet Protocol" ("IP") address was a numerical identifier assigned to each device (e.g., a computer, router or mobile device) participating in a computer network that used the Internet for communication. IP addresses were usually written and displayed in human-readable notations, e.g., 123.45.678.9. An IP address served two principal functions: host or network interface identification and location addressing. Because every device that connected to the Internet used an IP address, IP address information could identify computers and other devices that accessed the Internet.

14. A "server" was a computer program designed to process requests and deliver data to other computers over a local network or the Internet. There were different types of computer servers, including: (a) web servers, which hosted web pages and ran applications in web browsers; (b) email servers, which facilitated sending and receiving email messages; and (c) identity servers, which supported logins and security roles for authorized users. All servers ran on computers.

15. A "Media Access Control" ("MAC") address was a unique identification number assigned to a network interface such as a wireless or ethernet card attached to a computer.

16. "Twitter" was an online social networking service. A "direct message" was a messaging function in Twitter that allowed a user to send a private message to a specific user.

17. "Internet Relay Chat" ("IRC") was a method of sending direct messages to another user. IRC also allowed one-on-one communications via private messages and group communications through chat rooms or channels. IRC servers were often located outside of the United States. For this reason, IRC was viewed as a secure method of communicating with others.

III. The Fraudulent Scheme

18. In or about and between September 2014 and May 2017, the defendant JOSEPH P. WILLNER, together with others, conspired to access without authorization computer servers that hosted online securities brokerage accounts ("Victim Accounts") of unwitting victims who resided in the Eastern District of New York and elsewhere ("Intrusion Victims"). After WILLNER's co-conspirators had obtained unauthorized access to the Victim Accounts, WILLNER and his co-conspirators used the Victim Accounts to commit securities fraud and wire fraud. Specifically, WILLNER's co-conspirators fraudulently used the Victim Accounts to place unauthorized trades of the stock of targeted companies, each of which was an issuer of a class of securities that was publicly traded in the United States ("Targeted Companies"), which benefited accounts that belonged to WILLNER and his co-conspirators ("WILLNER Accounts"). The WILLNER Accounts included, for the period

from approximately February 2015 to April 2015, an account WILLNER held in his name ("WILLNER Brokerage Account") at a U.S.-based brokerage firm ("Brokerage Firm A"), an entity the identity of which is known to the Grand Jury. To fund the unauthorized trades, WILLNER's co-conspirators at times fraudulently liquidated existing positions held by the Victim Accounts and/or wired funds to the Victim Accounts from bank accounts linked to the Victim Accounts. To avoid detection by the brokerage firms, WILLNER's co-conspirators accessed the Victim Accounts using IP addresses consistent with the geographical locations of the Victim Accounts, including IP addresses in the Eastern District of New York.

19. The defendant JOSEPH P. WILLNER and his co-conspirators used the WILLNER Accounts to place short sale orders during pre-market and after-hours trading for securities at prices above the prevailing market prices. At or about the same time, WILLNER's co-conspirators fraudulently used the Victim Accounts, without the victims' authorization, to place buy orders at prices that matched WILLNER's and his co-conspirators' short sale orders. In so doing, WILLNER and his co-conspirators executed their short sale orders at artificially high prices.

20. After the short sale transactions were completed, the defendant JOSEPH P. WILLNER and his co-conspirators covered the short sales in two principal ways. First, WILLNER and his co-conspirators used the WILLNER Accounts to purchase securities at the prevailing market prices, which were below the short sale prices, allowing WILLNER and his co-conspirators to profit. Second, WILLNER and his co-conspirators fraudulently used the Victim Accounts, without the victims' authorization, to sell securities

to WILLNER and his co-conspirators at prices below the prevailing market prices, allowing WILLNER and his co-conspirators to profit.

21. The defendant JOSEPH P. WILLNER and his co-conspirators also used the Victim Accounts to favorably manipulate the prices of securities of the Targeted Companies held in the WILLNER Accounts. For example, WILLNER's co-conspirators fraudulently used the Victim Accounts, without the victims' authorization, to make a series of purchases of a security that WILLNER and his co-conspirators held in order to artificially increase the price of the security. WILLNER and his co-conspirators then sold the security to generate a profit.

22. Shortly before the defendant JOSEPH P. WILLNER began using the WILLNER Accounts to trade securities against Victim Accounts, WILLNER agreed to pay Co-Conspirator 1 a percentage of their profits from such trading in bitcoin.

23. In or about April 2015, the defendant JOSEPH P. WILLNER opened a Coinbase account, which WILLNER used to send payments to bitcoin addresses provided by Co-Conspirator 1.

24. From approximately April 2015 to August 2016, the defendant JOSEPH P. WILLNER sent bitcoin payments totaling approximately $237,120 to bitcoin addresses provided by Co-Conspirator 1.

A. WILLNER's Communications Concerning the Scheme

25. In or about February 2015, the defendant JOSEPH P. WILLNER and Co-Conspirator 1 began corresponding through Twitter direct messages, wherein, in sum and substance, they ultimately agreed that WILLNER would execute trades against Victim Accounts, and they would share the proceeds of those trades. On or about February 11,

2015, WILLNER told Co-Conspirator 1: "I need to rebuild with you." Co-Conspirator 1 responded, in sum and substance, that Co-Conspirator 1 would be ready to work soon, adding that he/she had made "200%" on one stock during pre-market trading. WILLNER responded: "ok hopefully we can do some stuff together." Immediately thereafter, Co-Conspirator 1 wrote: "legal trading too hard." WILLNER responded that he would be a "good trading partner." Co-Conspirator 1 reminded WILLNER, in sum and substance, that the "deal" involved splitting their trading profits "half half." WILLNER wrote, in sum and substance, that he was worried about sending money to Co-Conspirator 1. Co-Conspirator 1 instructed WILLNER, in sum and substance, to use bitcoin.

26. Also on or about February 11, 2015, the defendant JOSEPH P. WILLNER sent Co-Conspirator 1 a Twitter direct message stating, in sum and substance, that WILLNER had an account at Brokerage Firm A.

27. On or about April 10, 2015, at approximately 2:59 p.m., the defendant JOSEPH P. WILLNER sent Co-Conspirator 1 a Twitter direct message asking Conspirator 1, in sum and substance, to engage in after-hours trading. Co-Conspirator 1 agreed, stating, in sum and substance, that Co-Conspirator 1 could achieve a large percentage profit instantly and share the proceeds with WILLNER but that Co-Conspirator 1 no longer had an online trading account because it had been closed. At approximately 4:24 p.m., WILLNER instructed Co-Conspirator 1, in sum and substance, to communicate on IRC. At approximately 4:24 p.m., Co-Conspirator 1 sent WILLNER a Twitter direct message stating, in sum and substance, that Co-Conspirator 1 was on IRC.

28. On or about April 10, 2015, at approximately 5:22 p.m., the WILLNER Brokerage Account placed a short sale order for 537 shares of First Community Corporation

("FCCO") at $14.88 per share during after-hours trading, which was later executed through a purchase by a Victim Account held at Brokerage Firm B, an entity the identity of which is known to the Grand Jury, held in the name of an intrusion victim ("Intrusion Victim 1"), an individual whose identity is known to the Grand Jury. Intrusion Victim 1 did not authorize the trades in FCCO made from Intrusion Victim 1's account on or about April 10, 2015. The closing price of FCCO on April 10, 2015 was $11.64, approximately 24 percent lower than $14.88. The relevant trades that evening were made as follows: at approximately 5:23 p.m., Intrusion Victim 1's account placed a buy order for 537 shares of FCCO for $14.88 per share, matching the defendant JOSEPH P. WILLNER's short sale offer. A few seconds later, both WILLNER's short sale order and the buy order from Intrusion Victim 1's account were executed. A similar cycle of activity was completed minutes later so that WILLNER could cover the short sale. At approximately 5:26 p.m., the WILLNER Brokerage Account placed a buy order for 537 shares of FCCO at $9.40 per share. Approximately six minutes later, Intrusion Victim 1's account placed a sell order for the same number of shares of FCCO at $9.40 per share, approximately 19 percent lower than the $11.64 closing price, and the orders were executed. This series of transactions generated a gross profit of $2,942.76 for WILLNER and generated a loss of $2,942.76 in Intrusion Victim 1's account.

29. In addition, between approximately April 10, 2015 and April 14, 2015, the WILLNER Brokerage Account executed multiple trades against Victim Accounts, which were reversed shortly thereafter by the brokerage firms based upon suspicious trading activity. On or about April 14, 2015, a representative from Brokerage Firm A spoke to the defendant JOSEPH P. WILLNER and told him during a call recorded by Brokerage Firm A, in sum and substance, that Brokerage Firm A was questioning WILLNER's stock trading

techniques. The Brokerage Firm A representative stated that WILLNER was "placing orders . . . well outside of anything that should be being executed," and also told WILLNER that Brokerage Firm A had received a notification from the Financial Industry Regulatory Authority raising the question whether WILLNER had engaged in fraudulent trading.

30. In Twitter direct messages sent on or about April 14, 2015, the defendant JOSEPH P. WILLNER informed Co-Conspirator 1 that Brokerage Firm A had "yelled at" him for "placing high orders," and that Brokerage Firm A would close the account. During the same week, WILLNER and Co-Conspirator 1 exchanged multiple Twitter direct messages discussing, in sum and substance, the maximum percentage difference above or below the prevailing market price that they should use in their trading in order to avoid detection.

31. On or about April 20, 2015, Brokerage Firm A restricted the WILLNER Brokerage Account. Later that same day, Co-Conspirator 1 sent a Twitter direct message to the defendant JOSEPH P. WILLNER, stating: "15% is legit.. nothing mor[e]." On or about May 13, 2015, Brokerage Firm A sent a letter to WILLNER informing him, in sum and substance, that Brokerage Firm A had decided to terminate its business relationship with WILLNER and that WILLNER should not attempt to open a new account with Brokerage Firm A.

32. Also on or about April 20, 2015, the defendant JOSEPH P. WILLNER opened an online trading account in his name at a U.S.-based brokerage firm ("Brokerage Firm C"), an entity the identity of which is known to the Grand Jury, which was funded via a wire transfer from an account in his name at a U.S.-based financial institution ("Financial Institution A"), an entity the identity of which is known to the Grand Jury. Shortly

thereafter, WILLNER resumed trading securities with Co-Conspirator 1 as part of the fraudulent scheme.

B. WILLNER's Gain and Victims' Losses

33. As a result of the fraudulent scheme of the defendant JOSEPH P. WILLNER and his co-conspirators, WILLNER earned more than $700,000 in profits, and the brokerage firms that serviced the Victim Accounts (the "Targeted Brokerage Firms") lost more than $2,000,000.

COUNT ONE
(Conspiracy to Commit Wire Fraud)

34. The allegations contained in paragraphs one through 33 are realleged and incorporated as if fully set forth in this paragraph.

35. In or about and between September 2014 and May 2017, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JOSEPH P. WILLNER, together with others, did knowingly and intentionally conspire to devise a scheme and artifice to defraud the Intrusion Victims and the Targeted Brokerage Firms, and to obtain money and property from them by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice, to transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce writings, signs, signals, pictures and sounds, contrary to Title 18, United States Code, Section 1343.

(Title 18, United States Code, Sections 1349 and 3551 et seq.)

COUNT TWO
(Conspiracy to Commit Securities Fraud and Computer Intrusions)

36. The allegations contained in paragraphs one through 33 are realleged and incorporated as if fully set forth in this paragraph.

37. In or about and between September 2014 and May 2017, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JOSEPH P. WILLNER, together with others, did knowingly and willfully conspire:

(a) to use and employ manipulative and deceptive devices and contrivances, contrary to Rule 10b-5 of the Rules and Regulations of the United States Securities and Exchange Commission, Title 17, Code of Federal Regulations, Section 240.10b-5, by: (i) employing devices, schemes and artifices to defraud; (ii) making untrue statements of material fact and omitting to state material facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading; and (iii) engaging in acts, practices and courses of business which would and did operate as a fraud and deceit upon investors and potential investors in the Targeted Companies, in connection with the purchase and sale of investments in the Targeted Companies, directly and indirectly, by use of means and instrumentalities of interstate commerce and the mails, contrary to Title 15, United States Code, Sections 78j(b) and 78ff; and

(b) to access one or more protected computers with the intent to defraud and without authorization, and by means of such conduct further the intended fraud

and obtain something of value, to wit: information, United States currency and the use of computers, the value of which use was greater than $5,000 in any one-year period, contrary to Title 18, United States Code, Sections 1030(a)(4) and 1030(c)(3)(A).

38. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendant JOSEPH P. WILLNER, together with others, did commit and cause to be committed, among others, the following:

OVERT ACTS

(a) On or about April 10, 2015, at approximately 5:22 p.m., WILLNER used the WILLNER Brokerage Account to place a short sale order for 537 shares of FCCO at $14.88 per share, which trade was executed against a Victim Account of Intrusion Victim 1.

(b) On or about April 10, 2015, at approximately 5:26 p.m., WILLNER covered the foregoing short sale by using the WILLNER Brokerage Account to buy 537 shares of FCCO at $9.40 per share, which trade was executed against a Victim Account of Intrusion Victim 1, generating a gross profit of approximately $2,942.76 for WILLNER.

(c) On or about May 2, 2016, Co-Conspirator 1 accessed without authorization the computer of a New York-based order management company that permitted users to trade stocks online through their accounts at certain U.S.-based and foreign brokerage firms ("Data Company 1"), an entity the identity of which is known to the Grand Jury.

(d) On or about May 2, 2016, Co-Conspirator 1 accessed without authorization an account at Data Company 1, which belonged to a victim who resided in the

Eastern District of New York ("Intrusion Victim 2"), an individual whose identity is known to the Grand Jury.

(e) On or about May 2, 2016, Co-Conspirator 1 accessed Intrusion Victim 2's account at Data Company 1 without authorization from an IP address in the Eastern District of New York.

(f) On or about May 12, 2016, at approximately 8:12 a.m., WILLNER used his account at Brokerage Firm C to place a short sale order for 9,000 shares of Auris Medical Holding AG at $3.89 per share, which trade was executed against a Victim Account of Intrusion Victim 2 through Data Company 1.

(g) On or about May 12, 2016, at approximately 8:15 a.m., WILLNER covered the foregoing short sale by using his account at Brokerage Firm C to buy 9,000 shares of Auris Medical Holding AG at $3.20 per share, which trade was executed against a Victim Account of Intrusion Victim 2 through Data Company 1, generating a gross profit of approximately $6,210 for WILLNER.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNT THREE
(Securities Fraud)

39. The allegations contained in paragraphs one through 33 are realleged and incorporated as if fully set forth in this paragraph.

40. In or about and between September 2014 and May 2017, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JOSEPH P. WILLNER, together with others, did knowingly and willfully use and employ one or more manipulative and deceptive devices and contrivances, contrary to Rule

10b-5 of the Rules and Regulations of the United States Securities and Exchange Commission, Title 17, Code of Federal Regulations, Section 240.10b-5, by: (a) employing one or more devices, schemes and artifices to defraud; (b) making one or more untrue statements of material fact and omitting to state one or more material facts necessary in order to make the statements made, in light of the circumstances in which they were made, not misleading; and (c) engaging in one or more acts, practices and courses of business which would and did operate as a fraud and deceit upon one or more investors and potential investors in the Targeted Companies, in connection with the purchase and sale of investments in the Targeted Companies, directly and indirectly, by use of means and instrumentalities of interstate commerce and the mails.

(Title 15, United States Code, Sections 78j(b) and 78ff; Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT FOUR
(Conspiracy to Commit Money Laundering)

41. The allegations contained in paragraphs one through 33 are realleged and incorporated as if fully set forth in this paragraph.

42. In or about and between September 2014 and May 2017, both dates being approximate and inclusive, within the Southern District of New York, the defendant JOSEPH P. WILLNER, together with others, did knowingly and intentionally conspire: (a) to conduct one or more financial transactions affecting interstate and foreign commerce, to wit: interstate and foreign transfers of funds, which transactions in fact involved the proceeds of specified unlawful activity, to wit: computer intrusions, in violation of Title 18, United States Code, Section 1030(a)(4), wire fraud, in violation of Title 18, United States

Code, Section 1343, and fraud in the sale of securities, in violation of Title 15, United States Code, Sections 78j(b) and 78ff (collectively, the "Specified Unlawful Activities"), knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, with the intent to promote the carrying on of the Specified Unlawful Activities, contrary to Title 18, United States Code, Section 1956(a)(1)(A)(i); and (b) to conduct one or more financial transactions affecting interstate and foreign commerce, to wit: interstate and foreign transfers of funds, which transactions in fact involved the proceeds of the Specified Unlawful Activities, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, and knowing that the financial transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of the Specified Unlawful Activities, contrary to Title 18, United States Code, Section 1956(a)(1)(B)(i).

(Title 18, United States Code, Sections 1956(h) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS ONE AND THREE

43. The United States hereby gives notice to the defendant that, upon his conviction of either of the offenses charged in Counts One or Three, the United States will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offenses to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offenses.

44. If any of the above-described forfeitable property, 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), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT TWO

45. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count Two, the government will seek forfeiture in accordance with (a) Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense; and (b) Title 18, United States Code, Sections 982(a)(2) and 1030(i), which require any person convicted of such offense, to forfeit any property constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense, any interest in any personal property used or intended to be used to commit or to

facilitate the commission of such violation, and any property, real or personal, constituting or derived from, any proceeds obtained, directly or indirectly, as a result of such violation.

46. If any of the above-described forfeitable property, 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), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(2), 982(b)(1) and 1030(i); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT FOUR

47. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count Four, the government will seek forfeiture in

accordance with Title 18, United States Code, Section 982(a)(1), which requires any person convicted of such offense to forfeit any property, real or personal, involved in such offense, or any property traceable to such property.

48. If any of the above-described forfeitable property, 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), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 982(a)(1) and 982(b)(1); Title 21, United States Code, Section 853(p))

A TRUE BILL

_____
FOREPERSON

BRIDGET M. ROHDE
ACTING UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

SANDRA L. MOSER
ACTING CHIEF, FRAUD SECTION
CRIMINAL DIVISION
U.S. DEPT. OF JUSTICE

F. # 2017R001656
FORM DBD-34
JUN. 85

No.

UNITED STATES DISTRICT COURT
EASTERN *District of* NEW YORK
CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

JOSEPH P. WILLNER,

Defendant.

INDICTMENT

(T. 15, U.S.C., §§ 78j(b) and 78ff; T. 18, U.S.C., §§ 371, 981(a)(1)(C), 982(a)(1), 982(a)(2)(B), 982(b)(1), 1030(i), 1349, 1956(h), 2 and 3551 et seq.; T. 21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c).)

A true bill.

_____ *Foreperson*

Filed in open court this _____ *day,*

of _____ *A.D. 20* _____

_____ *Clerk*

Bail, $ _____

_____

Tiana A. Demas, Mark E. Bini and David Kessler, Assistant U.S. Attorneys (718) 254-7000
Cory E. Jacobs, U.S. Department of Justice Trial Attorney, (202) 616-4994