

**FILED**  
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U.S. DISTRICT COURT E.D.N.Y.  
★ NOV 25 2019 ★

**CR 19 563**

SD:SK/FJN  
F. #2018R01812 BROOKLYN OFFICE

**IRIZARRY, CH.J.**

**REYES, M.J.**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

INDICTMENT

- against -

JOANNA DE ALBA,  
also known as "RaptureReloaded,"  
  
Defendant.

Cr. No. \_\_\_\_\_  
(T. 18, U.S.C., §§ 2 and 3551 et seq.;  
T. 21, U.S.C., §§ 841(a),  
841(b)(1)(B)(viii), 841(b)(1)(C), 846,  
853(a) and 853(p))

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THE GRAND JURY CHARGES:

INTRODUCTION

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

1. Individuals established online marketplaces for narcotics and other illegal items. These marketplaces commonly existed on the dark web, a part of the internet located beyond the reach of traditional internet browsers and accessible only through the use of networks designed to conceal user identities.

2. Wall Street Market was a large global dark web marketplace. It functioned like a conventional e-commerce website but was geared towards the trafficking of contraband. Vendors advertised the sale of illegal narcotics and other contraband, among other things; buyers purchased the illegal narcotics and contraband; buyers paid for the purchased goods using digital currency; and vendors shipped the goods through the United States mail and other means of delivery. Wall Street Market required its users to trade in

digital currencies, primarily Bitcoin, and the marketplace did not allow for transactions in official, government-backed fiat currency.

3. Vendors and buyers operated under anonymous monikers. However, vendors received ratings from buyers of narcotics based on, among other things, the quality of contraband, reliability of delivery and volume of traffic. In addition, vendors received rankings from the marketplace administrators based on user input.

4. In or about and between June 2018 and May 2019, the defendant JOANNA DE ALBA operated as a vendor of illegal narcotics on Wall Street Market, using the online moniker "RaptureReloaded." DE ALBA advertised and sold fentanyl, heroin, oxycodone, methadone, cocaine, methamphetamine, ecstasy and other substances containing MDMA (3,4-methylenedioxy-methamphetamine) to customers in the United States and around the world. DE ALBA specifically targeted customers in the United States by, among other things, offering free shipping to addresses in the United States. DE ALBA advertised these substances as having come from suppliers in Mexico, the Netherlands, the United States and elsewhere.

5. In addition, DE ALBA offered a premium service consisting of "stealth" delivery options, ranging from "Basic Stealth" and "Better Stealth" to "Super Stealth" and "Secured Stealth 360." These options involved various measures to obfuscate the external and internal packaging of the illegal narcotics shipment to evade detection by postal inspectors and other law enforcement authorities and, alternatively, to reveal to the buyer whether law enforcement authorities had intercepted, tampered with or were monitoring the shipment.

6. DE ALBA directed customers to pay her in Bitcoin and contact her through encrypted email and messaging services.

7. DE ALBA completed hundreds of transactions on Wall Street Market and regularly received high ratings and positive reviews from buyers.

COUNT ONE

(Conspiracy to Distribute and Possess with Intent to Distribute Heroin and Methamphetamine)

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

9. In or about and between June 2018 and May 2019, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JOANNA DE ALBA, also known as “RaptureReloaded,” together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) a substance containing heroin, a Schedule I controlled substance; and (b) a substance containing methamphetamine, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1). The amount of methamphetamine involved in the conspiracy attributable to the defendant as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, was 5 grams or more of methamphetamine, its salts, isomers and salts of its isomers.

(Title 21, United States Code, Sections 846 and 841(b)(1)(B)(viii); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWO

(Distribution and Possession with Intent to Distribute Heroin)

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

11. On or about October 3, 2018, within the Eastern District of New York and elsewhere, the defendant JOANNA DE ALBA, also known as “RaptureReloaded,” together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 841(a) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT THREE

(Distribution and Possession with Intent to Distribute Heroin and Methamphetamine)

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

13. On or about January 3, 2019, within the Eastern District of New York and elsewhere, the defendant JOANNA DE ALBA, also known as “RaptureReloaded,” together with others, did knowingly and intentionally distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) a substance containing heroin, a Schedule I controlled substance; and (b) 5 grams or more of methamphetamine, its salts, isomers and salts of its isomers, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a) and 841(b)(1)(B)(viii); Title 18, United States Code, Sections 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

14. The United States hereby gives notice to the defendant that, upon her conviction of any of the offenses charged herein, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offenses to forfeit: (a) any property constituting, or derived from, any proceeds obtained directly or indirectly as a result of such offenses; and (b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.


15. 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 21, United States Code, Sections 853(a) and 853(p))

A TRUE BILL



FOREPERSON



RICHARD T. DONOGHUE  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

F.#: 2018R01812  
FORM DBD-34  
JUN. 85

No.

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**UNITED STATES DISTRICT COURT**

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

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THE UNITED STATES OF AMERICA

vs.

JOANNA DE ALBA,

Defendant.

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**INDICTMENT**

( T. 18, U.S.C., §§ 2 and 3551 et seq.;  
T. 21, U.S.C., §§ 841(a), 841(b)(1)(B)(viii), 841(b)(1)(C), 846, 853(a)  
and 853(p))

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*A true bill.*

\_\_\_\_\_   
*Foreperson*

Filed in open court this \_\_\_\_\_ day,

of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

\_\_\_\_\_ *Clerk*

Bail, \$ \_\_\_\_\_

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*Saritha Komatireddy and Francisco J. Navarro, Assistant U.S. Attorneys  
(718) 254-6054/6007*