

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No. 17-CR-20648-SCOLA**

**UNITED STATES OF AMERICA**

v.

**GAL VALLERIUS,  
a/k/a “OXYMONSTER,”**

**Defendant.**

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**GOVERNMENT’S NOTICE OF INTENT TO INTRODUCE  
INEXTRICABLY INTERTWINED AND PRIOR BAD ACT  
EVIDENCE PURSUANT TO FED.R.EVID. 404(b)**

The United States hereby files this notice of intent to introduce evidence of defendant’s so-called “bad acts” or other crimes evidence in its case-in-chief, as described below. This notice supplements the notice contained within the United States’ Discovery Response. Evidence of the previous criminal activity should be admitted because it is: (1) inextricably intertwined with the charged offense; or (2) admissible under Fed.R.Evid. 404(b) as proof of motive, opportunity, intent, preparation, plan, knowledge, identity, or absence of mistake or accident.

The government seeks to introduce in its case-in-chief the following evidence:

1. On or before March of 2017, the defendant began selling Ritalin and Oxycontin on the Darknet marketplace Hansa. On or before July of 2017, the defendant began communicating with undercover police officers posing as administrators of the Hansa Marketplace.<sup>1</sup>

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<sup>1</sup> On July 20, 2017, the National Police of the Netherlands (NPN) concluded an operation in which they ultimately took Hansa Market offline. During the course of the operation, the NPN seized Hansa Market

2. The defendant was a member of multiple previous darknet marketplaces, including Silk Road, Silk Road 2.0, Pandora, Nucleus, Abraxas, Oxygen, East India, Silkkitie, Evolution, and AlphaBay.
3. The defendant used other monikers or usernames on previous darknet marketplaces, namely the username, "gehenom."
4. The defendant was a member of an online cyber criminal forum since at least October 2016.

Nearly all of these matters are intrinsic to the charges in the superseding indictment and all are highly relevant the central issues at trial: the defendant's identity and his knowledge and intent with regard to the activities occurring on Dream Market.

Respectfully submitted,

BENJAMIN G. GREENBERG  
UNITED STATES ATTORNEY

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infrastructure. As a result of that seizure, the NPN gained access to evidence regarding individuals conducting illicit activity on Hansa Market. Specifically, the NPN obtained evidence of account activity, which included monikers, purchases of illegal goods and services, Bitcoin transaction information, and shipping addresses.

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 10, 2018 I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

BY: s/ Catherine Alden Pelker  
CATHERINE ALDEN PELKER  
TRIAL ATTORNEY  
U.S. DEPARTMENT OF JUSTICE