

FILED
JUN 24 2019
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
YOUNGSTOWN

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSEPH STIVER, aka MUTA, aka MYO,
JUSTIN ROBBINS, aka PRIZZ, aka
JPRIZZLE,

Defendants.

) INFORMATION

)

4:19CR 384

) CASE NO. _____

)

Title 18, Sections
1956(a)(1)(B)(i) and 1956(h),
and 2, United States Code

)

)

)

)

)

)

)

JUDGE PEARSON

MAG. JUDGE BURKE

COUNT 1

(Conspiracy to Launder Money, 18 U.S.C. § 1956(a)(1)(B)(i),
18 U.S.C. § 1956(h))

The United States Attorney alleges:

1. From in or around 2011, and continuing to in or around February 2014, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants, JOSEPH STIVER, aka MUTA, aka MYO, JUSTIN ROBBINS, aka PRIZZ, aka JPRIZZLE, did knowingly combine, conspire, and agree with each other and with other persons known and unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit: to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, conspiracy to distribute controlled substances, in violation of Title 21, United States Code, Section 846, possession of controlled substances with intent to

distributed and distribution thereof, in violation of Title 21, United States Code, Sections 841, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

MANNER AND MEANS OF THE CONSPIRACY

2. It was part of the conspiracy that:

A. STIVER sold illegal steroids over the Internet. To help provide anonymity to all parties, as part of the online sales transactions, steroid customers selected a manner of payment, with options that included payment by wire (e.g., Western Union, MoneyGram) and payment by stored-value cards (e.g., MoneyPak, Greendot). Each steroid customer's manner-of-payment selection dictated how STIVER managed the funds.

B. STIVER knew that to receive the wired payment, the individual receiving the funds usually needed to:

- I. receive the funds in the same general geographic location that the wiring individual directed during the wire's initiation,
- II. identify oneself to the wiring-entity employee by the same name that the wiring individual had provided to the wiring entity as the recipient during the wire's initiation and be ready to provide an identification card in that name, and

- III. provide the wiring-entity employee with the same password that the wiring individual had provided during the wire's initiation or provide the wiring-entity employee with the correct answer to the question posed by the wiring individual during the wire's initiation.

Accordingly, STIVER provided the steroid customers who selected payment by wire with a recipient name, a password or answer, and a location where the steroid customers were to wire the drug-purchasing money. STIVER also provided the same information, along with the amount of the wire, to either ROBBINS or Associate #1, a person known to the United States Attorney's Office. In the STIVER-and-ROBBINS transactions, names used included ROBBINS' own name, as well as aliases, including "Jason Rodman" or derivations on that name. In the STIVER-and-Associate #1 transactions, names were chosen from a list of actual people who were not otherwise involved in the drug selling or in the payment processing. Regardless if the transaction involved ROBBINS or Associate #1, STIVER instructed steroid customers to wire payment to the greater Detroit / Ann Arbor, Michigan area, where both ROBBINS and Associate #1 lived.

C. After the steroid customers wired the payments as instructed, ROBBINS or Associate #1 traveled to a location in the greater Detroit / Ann Arbor, Michigan, area where the wiring agency did business, such as a business with a Western Union terminal. There, ROBBINS or Associate #1 provided the wiring-agency employee with the information needed to receive the funds. After receiving the funds from the wiring agency and keeping some funds for his/her role, ROBBINS or Associate #1 then distributed the remaining funds at STIVER's

direction. These funds either went to STIVER, an associate of STIVER, or to one of STIVER's suppliers to pay for drugs or drug-trafficking goods that were used in STIVER's steroid distribution scheme.

D. STIVER instructed those steroid customers who opted to pay for their drugs by stored-value cards to load such a card with the amount of money owed for the steroid purchase. Once loaded, steroid customers provided STIVER with the stored-value card's account number and any other information, if applicable, needed to access the money.

E. Upon receipt of a stored-value card's associated information, STIVER forwarded that information to ROBBINS. Using that information, ROBBINS transferred the money, either online or via telephone, from the stored-value card to a financial-institution account that had a debit card associated with it.

F. The financial institution account and its associated debit card were not in ROBBINS's name. Instead, a member of the conspiracy had previously applied to the financial institution to open an account either in the name of a conspiracy member or in the name of an individual who had his/her personally identifiable information compromised. The financial institution, upon opening the applied-for account, mailed the debit card to the address listed on the application, which was an address where a conspiracy member could receive mail. Upon receipt of the mailed debit card, members of the conspiracy, at STIVER's direction, then mailed the card to STIVER or to another conspiracy member, including ROBBINS.

G. After transferring money into the financial institution account, ROBBINS or another member of the conspiracy used the account's associated debit card at an automated

teller machine (ATM) to withdraw the money. ROBBINS kept some money as his share and would keep the remaining money at his house until directed by STIVER on how to distribute it.

ACTS IN FURTHERANCE

3. In furtherance of the conspiracy, and to effect the goals and conceal the existence thereof, Defendants and others performed acts in the Northern District of Ohio and elsewhere, including, but not limited to the following:

1. In or about 2011 or 2012, STIVER surreptitiously acquired a Global Fitness gym membership list, which included personally identifiable information for several members, including Victim #1, Victim #2, and Victim #3, each of whose actual identity is known to the United States Attorney's Office.

2. On or about March 20, 2012, STIVER caused an application to be made to Bancorp Bank to open a bank account in the name of Victim #1.

3. On or about the dates and times listed below, STIVER and ROBBINS caused the following transactions to take place in and through Victim #1's Account:

DATE	TIME	TRANSACTION	LOCATION	AMOUNT	FEE
July 20, 2012	3:55 AM	Prepaid Debit Add Funds	N/A	\$415.00	N/A
July 20, 2012	6:44 PM	ATM Withdrawal	Warren, OH	\$201.75	\$2.50
July 21, 2012	10:24 PM	ATM Withdrawal	Cortland, OH	\$202.50	\$2.50
August 10, 2012	12:55 PM	Prepaid Debit Add Funds	N/A	\$200.00	N/A
August 10, 2012	12:56 PM	Prepaid Debit Add Funds	N/A	\$165.00	N/A

August 10, 2012	7:21 PM	ATM Withdrawal	Warren, OH	\$300.00	\$2.50
August 11, 2012	1:53 AM	Prepaid Debit Add Funds	N/A	\$105.00	N/A
August 11, 2012	5:16 PM	ATM Withdrawal	Warren, OH	\$143.00	\$2.50
September 28, 2012	4:14 AM	Prepaid Debit Add Funds	N/A	\$450.00	N/A
September 29, 2012	1:03 AM	ATM Withdrawal	Warren, OH	\$300.00	\$2.50
October 6, 2012	5:02 PM	Prepaid Debit Add Funds	N/A	\$335.00	N/A
October 6, 2012	11:52 PM	ATM Withdrawal	Warren, OH	\$300.00	\$2.50
October 17, 2012	12:53 AM	Prepaid Debit Add Funds	N/A	\$315.00	N/A
October 19, 2012	8:22 AM	USPS Debit	Youngtown, OH	\$32.10	N/A
October 19, 2012	8:22 AM	USPS Debit	Youngtown, OH	\$32.10	N/A
October 19, 2012	8:22 AM	USPS Debit	Youngtown, OH	\$32.10	N/A
October 19, 2012	8:22 AM	USPS Debit	Youngtown, OH	\$32.10	N/A
October 19, 2012	8:22 AM	USPS Debit	Youngtown, OH	\$32.10	N/A
November 26, 2012	2:38 AM	Prepaid Debit Add Funds	N/A	\$230.00	N/A
December 4, 2012	3:47 AM	ATM Withdrawal	Warren, OH	\$300.00	\$2.50
December 6, 2012	2:38 AM	ATM Withdrawal	Warren, OH	\$230.00	\$2.50
December 27, 2012	6:00 AM	Prepaid Debit Add Funds	N/A	\$180.00	N/A
December 27, 2012	2:11 PM	ATM Withdrawal	Birch Run, MI	\$162.50	\$2.50
January 7, 2013	4:08 AM	Prepaid Debit Add Funds	N/A	\$215.00	N/A

January 7, 2013	11:50 AM	ATM Withdrawal	Whitmore Lake, MI	\$202.00	\$2.50
January 23, 2013	4:50 AM	Prepaid Debit Add Funds	N/A	\$325.00	N/A
January 23, 2013	4:11 PM	ATM Withdrawal	Ann Arbor, MI	\$303.00	\$2.50
February 19, 2013	5:24 AM	Prepaid Debit Add Funds	N/A	\$300.00	N/A
February 19, 2013	11:53 AM	ATM Withdrawal	Whitmore Lake, MI	\$303.00	\$2.50
February 20, 2013	4:30 AM	Prepaid Debit Add Funds	N/A	\$500.00	N/A
February 20, 2013	11:20 AM	ATM Withdrawal	Whitmore Lake, MI	\$303.00	\$2.50
February 21, 2013	11:47 AM	ATM Withdrawal	Whitmore Lake, MI	\$203.00	\$2.50
March 13, 2013	4:31 AM	Prepaid Debit Add Funds	N/A	\$495.05	N/A
March 13, 2013	10:50 AM	ATM Withdrawal	Whitmore Lake, MI	\$303.00	\$2.50
March 14, 2013	11:10 AM	ATM Withdrawal	Whitmore Lake, MI	\$183.00	\$2.50
March 22, 2013	3:27 AM	Prepaid Debit Add Funds	N/A	\$375.00	N/A
March 22, 2013	9:08 AM	ATM Withdrawal	Whitmore Lake, MI	\$303.00	\$2.50
April 11, 2013	4:20 AM	Prepaid Debit Add Funds	N/A	\$385.00	N/A
April 11, 2013	10:07 AM	ATM Withdrawal	Whitmore Lake, MI	\$303.00	\$2.50
April 13, 2013	3:42 PM	ATM Withdrawal	Whitmore Lake, MI	\$82.50	\$2.50
May 8, 2013	5:31 AM	Prepaid Debit Add Funds	N/A	\$310.00	N/A
May 8, 2013	11:05 AM	ATM Withdrawal	Whitmore Lake, MI	\$303.00	\$2.50
August 8, 2013	3:50 AM	Prepaid Debit Add Funds	N/A	\$295.00	N/A
August 8, 2013	3:51 AM	Prepaid Debit Add Funds	N/A	\$345.00	N/A

August 8, 2013	9:42 AM	ATM Withdrawal	Ann Arbor, MI	\$303.00	\$0.00
August 9, 2013	10:18 AM	ATM Withdrawal	Whitmore Lake, MI	\$303.00	\$0.00
August 14, 2013	4:52 AM	Prepaid Debit Add Funds	N/A	\$230.00	N/A
August 14, 2013	4:53 AM	Prepaid Debit Add Funds	N/A	\$220.00	N/A
August 14, 2013	10:29 AM	ATM Withdrawal	Whitmore Lake, MI	\$303.00	\$2.50
August 15, 2013	8:45 PM	ATM Withdrawal	Whitmore Lake, MI	\$162.50	\$2.50
August 18, 2013	6:55 AM	Prepaid Debit Add Funds	N/A	\$430.00	N/A
August 19, 2013	9:18 PM	ATM Withdrawal	Ypsilanti, MI	\$303.00	\$2.50
August 20, 2013	11:17 AM	ATM Withdrawal	Ann Arbor, MI	\$123.00	\$2.50
August 27, 2013	4:39 AM	Prepaid Debit Add Funds	N/A	\$500.00	N/A
August 28, 2013	11:03 AM	ATM Withdrawal	Whitmore Lake, MI	\$303.00	\$2.50
August 30, 2013	8:11 PM	ATM Withdrawal	Ann Arbor, MI	\$182.00	\$2.50
September 6, 2013	6:35 PM	Prepaid Debit Add Funds	N/A	\$460.00	N/A
September 8, 2013	10:52 PM	ATM Withdrawal	Fenton, MI	\$303.00	\$2.50
September 11, 2013	10:32 AM	ATM Withdrawal	Ann Arbor, MI	\$163.00	\$2.50

4. On or about July 26, 2012, members of the conspiracy caused an application to be made to Bancorp Bank to open a bank account in the name of Victim #2.

5. On or about the dates and times listed below, STIVER and ROBBINS caused the following transactions to take place in and through Victim #2's Account:

DATE	TIME	TRANSACTION	LOCATION	AMOUNT	FEE
August 22, 2012	6:49 PM	Prepaid Debit Add Funds	N/A	\$495.00	\$4.95
August 23, 2012	12:51 AM	ATM Withdrawal	Warren, OH	\$300.00	\$2.50
August 23, 2012	11:35 PM	ATM Withdrawal	Warren, OH	\$182.50	\$2.50
September 3, 2012	1:46 AM	Prepaid Debit Add Funds	N/A	\$305.00	\$0.00
September 4, 2012	12:06 AM	ATM Withdrawal	Warren, OH	\$300.00	\$2.50
September 28, 2012	4:08 AM	Prepaid Debit Add Funds	N/A	\$300.00	\$0.00
October 1, 2012	2:34 AM	ATM Withdrawal	Warren, OH	\$291.75	\$2.50
October 6, 2012	5:01 PM	Prepaid Debit Add Funds	N/A	\$280.00	\$0.00
October 6, 2012	11:51 PM	ATM Withdrawal	Warren, OH	\$280.00	\$2.50
October 28, 2012	3:38 AM	Prepaid Debit Add Funds	N/A	\$255.00	\$0.00
October 29, 2012	11:35 PM	ATM Withdrawal	Warren, OH	\$251.75	\$2.50
November 26, 2012	2:36 AM	Prepaid Debit Add Funds	N/A	\$500.00	\$0.00
November 28, 2012	12:16 AM	ATM Withdrawal	Warren, OH	\$300.00	\$2.50
December 6, 2012	2:55 AM	ATM Withdrawal	Cortland, OH	\$183.00	\$2.50
December 27, 2012	6:01 AM	Prepaid Debit Add Funds	N/A	\$850.00	\$0.00
December 27, 2012	4:54 PM	ATM Withdrawal	Birch Run, MI	\$303.00	\$2.50
December 29, 2012	7:35 PM	ATM Withdrawal	Brighton, MI	\$202.25	\$2.50
December 30, 2012	8:41 PM	ATM Withdrawal	Whitmore Lake, MI	\$303.00	\$2.50

December 31, 2012	6:10 PM	ATM Withdrawal	Whitmore Lake, MI	\$43.00	\$2.50
January 8, 2013	3:39 AM	Prepaid Debit Add Funds	N/A	\$450.00	\$0.00
January 8, 2013	8:29 AM	ATM Withdrawal	Ann Arbor, MI	\$303.00	\$2.50
January 10, 2013	9:13 PM	ATM Withdrawal	Ann Arbor, MI	\$143.00	\$2.50
March 10, 2013	8:47 AM	Prepaid Debit Add Funds	N/A	\$320.00	\$0.00
March 11, 2013	11:08 AM	ATM Withdrawal	Ann Arbor, MI	\$303.00	\$2.50
March 19, 2013	5:31 AM	Prepaid Debit Add Funds	N/A	\$390.00	\$0.00
March 19, 2013	10:56 AM	ATM Withdrawal	Whitmore Lake, MI	\$303.00	\$2.50
March 20, 2013	10:46 AM	ATM Withdrawal	Whitmore Lake, MI	\$83.00	\$2.50
April 4, 2013	3:56 AM	Prepaid Debit Add Funds	N/A	\$440.00	\$0.00
April 4, 2013	9:40 AM	ATM Withdrawal	Whitmore Lake, MI	\$303.00	\$2.50
April 5, 2013	8:00 PM	ATM Withdrawal	Whitmore Lake, MI	\$143.00	\$2.50
May 1, 2013	3:02 AM	Prepaid Debit Add Funds	N/A	\$820.00	\$0.00
May 1, 2013	9:36 AM	ATM Withdrawal	Whitmore Lake, MI	\$303.00	\$2.50
May 2, 2013	11:03 AM	ATM Withdrawal	Whitmore Lake, MI	\$303.00	\$2.50
May 3, 2013	11:07 AM	ATM Withdrawal	Whitmore Lake, MI	\$203.00	\$2.50
August 7, 2013	3:23 AM	Prepaid Debit Add Funds	N/A	\$260.00	\$0.00
August 7, 2013	3:24 AM	Prepaid Debit Add Funds	N/A	\$630.00	\$0.00
August 7, 2013	9:06 AM	ATM Withdrawal	Whitmore Lake, MI	\$303.00	\$2.50
August 8, 2013	9:23 AM	ATM Withdrawal	Whitmore Lake, MI	\$303.00	\$2.50

August 10, 2013	4:31 PM	ATM Withdrawal	Ann Arbor, MI	\$283.00	\$2.50
August 14, 2013	4:57 AM	Prepaid Debit Add Funds	N/A	\$500.00	\$0.00
August 14, 2013	10:31 AM	ATM Withdrawal	Whitmore Lake, MI	\$303.00	\$2.50
August 14, 2013	8:18 PM	ATM Withdrawal	Whitmore Lake, MI	\$182.50	\$2.50
August 21, 2013	11:59 PM	Prepaid Debit Add Funds	N/A	\$230.00	\$0.00
August 22, 2013	12:02 AM	Prepaid Debit Add Funds	N/A	\$330.00	\$0.00
August 22, 2013	10:59 AM	ATM Withdrawal	Whitmore Lake, MI	\$303.00	\$2.50
August 26, 2013	8:36 PM	ATM Withdrawal	Ann Arbor, MI	\$243.00	\$2.50
August 29, 2013	5:29 AM	Prepaid Debit Add Funds	N/A	\$260.00	\$0.00
August 29, 2013	5:30 AM	Prepaid Debit Add Funds	N/A	\$285.00	\$0.00
August 29, 2013	3:40 PM	ATM Withdrawal	Ann Arbor, MI	\$303.00	\$2.50
August 30, 2013	7:58 PM	ATM Withdrawal	Ann Arbor, MI	\$243.00	\$2.50
November 9, 2013	9:38 PM	Prepaid Debit Add Funds	N/A	\$250.00	\$0.00
November 15, 2013	12:11 PM	ATM Withdrawal	Ann Arbor, MI	\$243.00	\$2.50
December 17, 2013	1:37 PM	Prepaid Debit Add Funds	N/A	\$500.00	\$0.00

6. On or about July 26, 2012, members of the conspiracy caused an application to be made to Bancorp Bank to open a bank account in the name of Victim #3.

7. On or about the dates and times listed below, STIVER and ROBBINS caused the following transactions to take place in and through Victim #3's Account:

DATE	TIME	TRANSACTION	LOCATION	AMOUNT	FEE
August 22, 2012	6:51 PM	Prepaid Debit Add Funds	N/A	\$330.00	\$0.00
August 23, 2012	12:50 AM	ATM Withdrawal	Warren, OH	\$300.00	\$2.50
September 1, 2012	6:22 PM	Prepaid Debit Add Funds	N/A	\$340.00	\$0.00
September 1, 2012	11:56 PM	ATM Withdrawal	Warren, OH	\$330.00	\$2.50
September 28, 2012	4:11 AM	Prepaid Debit Add Funds	N/A	\$400.00	\$0.00
October 1, 2012	2:44 AM	ATM Withdrawal	Warren, OH	\$300.00	\$2.50
October 3, 2012	5:09 AM	Prepaid Debit Add Funds	N/A	\$240.00	\$0.00
October 3, 2012	5:10 AM	Prepaid Debit Add Funds	N/A	\$335.00	\$0.00
October 4, 2012	6:44 PM	ATM Withdrawal	Warren, OH	\$301.75	\$2.50
October 6, 2012	11:53 PM	ATM Withdrawal	Warren, OH	\$300.00	\$2.50
October 28, 2012	3:39 AM	Prepaid Debit Add Funds	N/A	\$400.00	\$0.00
October 29, 2012	11:36 PM	ATM Withdrawal	Warren, OH	\$301.75	\$2.50
October 31, 2012	9:13 PM	ATM Withdrawal	Warren, OH	\$200.00	\$2.50
November 20, 2012	1:21 AM	Prepaid Debit Add Funds	N/A	\$280.00	\$0.00
December 4, 2012	12:40 AM	ATM Withdrawal	Warren, OH	\$251.75	\$2.50
December 31, 2012	2:43 AM	Prepaid Debit Add Funds	N/A	\$1,000.00	\$0.00
December 31, 2012	6:09 PM	ATM Withdrawal	Whitmore Lake, MI	\$303.00	\$2.50
January 2, 2013	11:12 AM	ATM Withdrawal	Whitmore Lake, MI	\$303.00	\$2.50
January 3, 2013	4:18 PM	ATM Withdrawal	Ann Arbor, MI	\$303.00	\$2.50

January 5, 2013	7:49 PM	ATM Withdrawal	Whitmore Lake, MI	\$63.00	\$2.50
January 7, 2013	5:40 PM	Prepaid Debit Add Funds	N/A	\$40.00	\$0.00
January 8, 2013	8:31 PM	ATM Withdrawal	Ann Arbor, MI	\$43.00	\$2.50
January 23, 2013	4:52 AM	Prepaid Debit Add Funds	N/A	\$310.00	\$0.00
January 23, 2013	4:12 PM	ATM Withdrawal	Ann Arbor, MI	\$303.00	\$2.50
February 7, 2013	4:31 AM	Prepaid Debit Add Funds	N/A	\$345.00	\$0.00
February 7, 2013	11:42 AM	ATM Withdrawal	Whitmore Lake, MI	\$303.00	\$2.50
February 8, 2013	4:32 PM	ATM Withdrawal	Ann Arbor, MI	\$23.00	\$2.50
February 20, 2013	4:33 AM	Prepaid Debit Add Funds	N/A	\$500.00	\$0.00
February 20, 2013	11:19 AM	ATM Withdrawal	Whitmore Lake, MI	\$303.00	\$2.50
February 21, 2013	11:46 AM	ATM Withdrawal	Whitmore Lake, MI	\$203.00	\$2.50
March 10, 2013	8:48 AM	Prepaid Debit Add Funds	N/A	\$355.00	\$0.00
March 11, 2013	11:07 AM	ATM Withdrawal	Ann Arbor, MI	\$303.00	\$2.50
March 13, 2013	4:32 AM	Prepaid Debit Add Funds	N/A	\$300.00	\$0.00
March 13, 2013	10:52 AM	ATM Withdrawal	Whitmore Lake, MI	\$303.00	\$2.50
March 15, 2013	10:47 AM	ATM Withdrawal	Whitmore Lake, MI	\$23.00	\$2.50
March 31, 2013	10:49 AM	Prepaid Debit Add Funds	N/A	\$490.00	\$0.00
March 31, 2013	6:41 PM	ATM Withdrawal	South Lyon, MI	\$303.00	\$2.50
April 1, 2013	10:46 AM	ATM Withdrawal	Whitmore Lake, MI	\$183.00	\$2.50
April 11, 2013	4:24 AM	Prepaid Debit Add Funds	N/A	\$360.00	\$0.00

April 12, 2013	10:59 AM	ATM Withdrawal	Whitmore Lake, MI	\$303.00	\$2.50
April 13, 2013	3:49 PM	ATM Withdrawal	Whitmore Lake, MI	\$42.25	\$2.50
May 6, 2013	5:38 AM	Prepaid Debit Add Funds	N/A	\$265.00	\$0.00
May 6, 2013	10:55 AM	ATM Withdrawal	Whitmore Lake, MI	\$263.00	\$2.50
August 7, 2013	3:26 AM	Prepaid Debit Add Funds	N/A	\$260.00	\$0.00
August 7, 2013	3:29 AM	Prepaid Debit Add Funds	N/A	\$245.00	\$0.00
August 7, 2013	9:27 AM	ATM Withdrawal	Ann Arbor, MI	\$303.00	\$0.00
August 10, 2013	4:18 PM	ATM Withdrawal	Ann Arbor, MI	\$162.50	\$2.50
August 13, 2013	3:18 AM	Prepaid Debit Add Funds	N/A	\$405.00	\$0.00
August 13, 2013	9:12 AM	ATM Withdrawal	Whitmore Lake, MI	\$303.00	\$2.50
August 14, 2013	7:24 PM	ATM Withdrawal	Ann Arbor, MI	\$123.00	\$2.50
August 15, 2013	8:26 AM	Prepaid Debit Add Funds	N/A	\$425.00	\$0.00
August 15, 2013	8:08 PM	ATM Withdrawal	Ann Arbor, MI	\$303.00	\$2.50
August 19, 2013	10:06 PM	ATM Withdrawal	Ypsilanti, MI	\$123.00	\$2.50
August 25, 2013	3:22 PM	Prepaid Debit Add Funds	N/A	\$250.00	\$0.00
August 25, 2013	3:25 PM	Prepaid Debit Add Funds	N/A	\$880.00	\$0.00
August 26, 2013	8:38 PM	ATM Withdrawal	Ann Arbor, MI	\$303.00	\$2.50
August 27, 2013	10:21 AM	ATM Withdrawal	Whitmore Lake, MI	\$303.00	\$2.50
August 28, 2013	6:07 PM	ATM Withdrawal	Hamburg, MI	\$302.00	\$2.50
August 29, 2013	3:15 PM	ATM Withdrawal	Ann Arbor, MI	\$202.00	\$2.50

November 7, 2013	9:22 PM	Prepaid Debit Add Funds	N/A	\$230.00	\$0.00
November 15, 2013	4:40 PM	ATM Withdrawal	Ypsilanti, MI	\$203.00	\$2.50
December 17, 2013	1:46 PM	Prepaid Debit Add Funds	N/A	\$220.00	\$0.00

8. In or around January 2014, Associate #1 collected money for STIVER.

9. In or around January 2014, STIVER instructed ROBBINS and Associate #1 to take precautions, including deleting emails and burning shipping labels that they may have accumulated as part of the scheme.

10. In or around January 2014, ROBBINS and Associate #1 deleted emails and destroyed other incriminating information.

11. In or around January 2014, STIVER instructed ROBBINS to send money ROBBINS had accumulated as part of this scheme, but not yet dispersed, to an address at Wright-Patterson Air Force Base.

12. In or around January 2014, STIVER instructed Associate #1 to mail money Associate #1 had accumulated as part of this conspiracy to launder money, but not yet dispersed, to an address at Wright-Patterson Air Force Base.

13. In or around January and February 2014, STIVER, in an attempt to cover up this conspiracy to launder money, deleted emails from accounts that ROBBINS and Associate #1 used.

14. On or around February 12, 2014, ROBBINS provided STIVER with a

Money Pak card valued at approximately \$1,000 that was funded with money ROBBINS had collected as part of this conspiracy to launder money.

15. On or around February 13, 2014, ROBBINS sent, at STIVER's direction, a Moneygram to Associate #2, a person known to the United States Attorney's Office, that was valued at approximately \$240 and was funded with money that ROBBINS had collected as part of this conspiracy to launder money.

All in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE

The United States Attorney further alleges:


4. The allegations contained in Count 1 is hereby re-alleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeiture pursuant to the provisions of 18 U.S.C. § 982(a)(1). As a result of this offense, JOSEPH STIVER, aka MUTA, aka MYO, and JUSTIN ROBBINS, aka PRIZZ, aka JPRIZZLE, the defendants herein, shall forfeit to the United States all property, real and personal, involved in such offense, and all property traceable to such property; including, but not limited to, the following:

- a.) \$59,560.00 U.S. Currency seized on March 21, 2014, at a location on Semmes Place, Wright-Patterson Air Force Base (Dayton), Ohio.

b.) \$2,000.00 U.S. Currency seized on March 6, 2014, at a location on Churchill Drive, Whitmore Lake, Michigan.

JUSTIN E. HERDMAN
United States Attorney

By:



DAVID M. TOEPFER
Attorney in Charge,
Youngstown Branch Office