

UNITED STATES DISTRICT COURT
for the
EASTERN DISTRICT OF MISSOURI

United States of America
v.
Alan Bill a/k/a "Vend0r" and "KingdomOfficial"

Case No. 4:23 MJ 2288 JSD

SIGNED AND SUBMITTED TO THE COURT FOR
FILING BY RELIABLE ELECTRONIC MEANS

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 2020 to December 14, 2023 in the county of St. Louis in the
Eastern District of Missouri, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Rows include 21 U.S.C. 846 and 841(a)(1) - Drug Trafficking Conspiracy, 18 U.S.C. 1028(f) and (a)(7) - Identity Theft Conspiracy, and 18 U.S.C. 1956(h) and (a)(1)(B)(i) - Money Laundering Conspiracy.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet.

I state under the penalty of perjury that the foregoing is true and correct.

/s/ David Ogurek

Complainant's signature

David Ogurek, Special Agent, FBI

Printed name and title

Sworn to, attested to, and affirmed before me via reliable electronic means pursuant to Federal Rules of
Criminal Procedure 4.1 and 41.

Date: December 14, 2023

Judge's signature

City and state: St. Louis, Missouri

Honorable Joseph S. Dueker, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, David J. Ogurek, being duly sworn, depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and I have worked as such for approximately sixteen (16) years. My current assignment is with the Violent Crime/Organized Crime Squad in the St. Louis, Missouri, Division, where I am detailed to work organized crime investigations and investigations related to illegal activity conducted on the Darknet. I have had numerous contacts and dealings with informants, victims, and other individuals known to engage in organized criminal activity, to include drug trafficking, major theft, money laundering, and fraud. I have investigated and/or assisted in numerous investigations relative to federal cases concerning the above-listed offenses. I have also received additional training in the illegal use of the Darknet, including the operations of Darknet Marketplaces (DNM), the use of virtual currency, and the utilization of end-to-end encrypted communications applications.

2. This affidavit is made in support of an application for a complaint and warrant to arrest **Alan BILL a/k/a “Vend0r” a/k/a “KingdomOfficial”** (“BILL”) for violations of 21 U.S.C. §§ 846 and 841(a)(1), 18 U.S.C. §§ 1028(f) and (a)(7), and 18 U.S.C. §§ 1956(h) and (a)(1)(B)(i) (the “Subject Offenses”).

3. The statements in this affidavit are based in part on my investigation of this matter and on information provided by other law enforcement agents, and others, as well as my personal observations and knowledge. Where statements of others are related herein, they are related in substance and in part. Because this affidavit is being submitted for the limited purpose of obtaining a criminal complaint and corresponding arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe that violations of the Subject Offenses, have occurred and that Alan Bill has committed them.

Kingdom Market

4. Since approximately May 2022, federal law enforcement has been investigating the hidden service darknet marketplace named Kingdom Market (“Kingdom”).

5. Kingdom opened in March 2021. In an interview published on Dread,¹ Kingdom administrators stated they began work on Kingdom during the summer of 2020.

6. Kingdom is presently one of the largest darknet marketplaces in the world and has thousands of active listings. Specifically, as of November 28, 2023, there were over

¹ Dread is a darknet forum site, similar to Reddit, that is commonly used as a forum to discuss illegal activities such as the manufacturing of drugs, sale of drugs, and ways to avoid law enforcement.

25,000 active listings on Kingdom offering for sale illegal drugs (such as heroin, cocaine, and unlicensed pharmaceuticals), stolen identities, credit card information, counterfeit currencies, computer malware, and fraudulent identity documents. These items and services are offered for sale and purchase in Bitcoin, Monero, and Litecoin. Kingdom allows individuals to pay for illegal goods and services by making a cryptocurrency payment to an escrow account that is controlled by Kingdom administrators.

7. Kingdom allows vendors to sell products on their site in exchange for a commission fee. As of December 6, 2023, the operators of Kingdom charge a 1% “deposit fee”, a “withdrawal fee” of 3%, and a fixed “transaction fee” of 0.30 Euro for activity on the market. This same page indicates that in order to become a vendor on Kingdom, a prospective vendor must pay a “vendor bond” of EUR 500. This vendor bond grants a seller the ability to market their services or products on the website.

8. In addition to taking a commission fee or “cut” of the proceeds of each sale made by a vendor on Kingdom, the operator(s) of Kingdom also set forth a series of rules regarding what items were not permitted to be sold on the market. As of December 6, 2023, per the “Becoming a Vendor on Kingdom Market” page (kingdommarket.live/article/becoming-a-vendor-on-kingdom-market-60), the following products/services are prohibited on Kingdom: prostitution, child porn, weapons, and murder services.

9. Kingdom takes steps to minimize the ability of law enforcement and third-party blockchain analysis services from attributing cryptocurrency addresses to their market, such as routinely changing the cryptocurrency deposit addresses for customer accounts. For example, if a Kingdom user wants to deposit Bitcoin to their account, they are notified that the Bitcoin address for their account changes every 7 days, and if the user sends Bitcoin to a previous address, the payment will not be credited to their account.

10. Your affiant knows the use of cryptocurrency is used because it is a relatively quick and borderless payment system with a variety of methods available for obfuscation. The methods of obfuscation for cryptocurrencies include user-initiated methods and privacy features of specific cryptocurrencies. User initiated methods include services such as mixers and noncustodial exchanges. Mixers are a service that increase the anonymity of certain cryptocurrency transactions. The methods of mixing services can vary, but generally include the ability to obfuscate through pooling funds and releasing them at various times and to seemingly unrelated addresses. Noncustodial exchanges are capable of facilitating chain hopping. Chain hopping occurs when someone exchanges one cryptocurrency for another cryptocurrency. Essentially moving the value of the cryptocurrency to another blockchain (i.e. Bitcoin to Litecoin). There are numerous noncustodial exchange services that collect no “Know Your Customer” (KYC) data and facilitate chain hopping.

11. Kingdom’s darknet site offers a link to their Dread forum page ([/d/KingdomMarket](https://d/KingdomMarket)). The Kingdom Dread page lists four moderators with individual titles, [/u/vend0r](https://d/vend0r) (identified as the user who created the subdread), [/u/Papinian3](https://d/Papinian3)

(“Admin”), /u/kingdommarketofficial (“King Admin”), and /u/OhLongJohnson (“Support Admin”).

12. The Kingdom darknet page also offers a link to clearnet site kingdommarket.live under the “help” section of the main page. This site, which is hosted by Namecheap, provides news regarding Kingdom as well as mirror links to access the hidden service. Kingdom also hosts another clearnet site at kingdommarket.so which is also hosted by Namecheap. As of December 13, 2023, Kingdom’s security guide available on Kingdommarket.live recommends the following techniques to preserve safety and anonymity:

- a. “Use Monero, which is more anonymous than BTC or LTC”
- b. “For higher security and storage of your digital financial resources we recommend hardware wallets such as Trezor or Ledger.”
- c. “We don’t recommend you to leave your digital currency in crypto exchanges like: Binance, Coinbase, Bittrex.”²
- d. “Encrypt your sensitive data!”³
- e. “In no circumstance shall use provide your (or anyone else’s) login details, personal data, real names, passwords, PGP keys, bank account numbers which you use in daily life or in the clearnet. It is the fastest way how you can show law enforcement authorities your doorbell, which no one in their right mind would want.”

13. In addition, as of December 13, 2023, Kingdom’s Bitcoin vs Monero comparison security available on Kingdommarket.live highlights the following features of Monero.

- a. “While Bitcoin addresses are not directly linked to personal identities, transaction patterns can be analysed which could reveal user behavior and spending habits. As a result, some users consider that Bitcoin does not offer sufficient privacy and anonymity.”
- b. “By contrast, there is an explicit aim of the Monero for addressing such privacy issues which exist in Bitcoin. To guarantee full privacy and anonymity, it uses advanced cryptographic methods such as ring signatures, hidden addresses or confidential transactions. The signature of a ring is made up of several users’ Public keys, which makes it exceedingly hard to find the true

² Your affiant notes that Binance, Coinbase, and Bittrex are generally responsive to law enforcement inquiries.

³ Your affiant notes that encryption often makes data inaccessible without the user’s password.

sender. For each transaction, the anonymous addresses generate a single unique address, which further conceals the receiver's identity.

- c. "Monero's transactions are intended to be untraceable so that users cannot be monitored or subjected to unwanted attention"

14. The subreddit r/kingdomofficial describes itself as "KingdomMarket official sub." The subreddit provides updates about the darknet marketplace as well as provides a forum where users can ask questions and receive support. The subreddit identifies the moderators as u/OhLongJohnsonKM, u/Papinian3, and u/KingdomOfficial. Your affiant notes that these usernames are substantially similar to the ones used by the moderators on the Kingdom's dread page.

BILL as Administrator of Kingdom

15. Your affiant has probable cause to believe that BILL, who is a Slovakian national residing in Bratislava, Slovakia, is an administrator of Kingdom. Specifically, investigators discovered the following:

- a. Certain cryptocurrency transactions from a cluster or group of cryptocurrency addresses used by Kingdom were traced to cryptocurrency wallets held in the name of BILL. Based on the timing and amounts of these transactions, your affiant believes these payments were made to an administrator of Kingdom.

- b. A specific IP address ("IP ADDRESS 1") that was used to access a Kingdom Reddit account was also used to access BILL's cryptocurrency accounts, his email address, and to apply for an ESTA application for BILL.

- c. Between November 2021 and April 2023, BILL had large unexplained deposits of Euro into his Slovakian bank accounts totaling approximately €189,000. Many of these deposits were made in cash.

- d. Private messages from Reddit user u/ohlongjohnsonKM (who is described as an administrator of Kingdom) and another individual discuss the purchase of graphic design services for Kingdom. The cryptocurrency account that paid for the graphic design services came from a wallet that had previously received cryptocurrency from BILL's known cryptocurrency wallet account. In addition, that same account received deposits from ChangeNow⁴ that are linked to requests resolving from IP ADDRESS 1.

⁴ ChangeNOW is a cryptocurrency exchanging service that allows you to use one cryptocurrency to trade for a different currency. ChangeNOW does not collect customer records but does maintain records of their transactions including pay in amount, payout amount, cryptocurrency types, and the IP address that requested the exchange.

e. BILL's email account has several saved images, videos and files that contain the word "Vend0r." Vend0r is the username of the individual who created the Kingdom subreddit on Dread.

f. BILL's Google account has numerous files that show recovery information and seed phrases⁵ for various cryptocurrency accounts, IP masking tools, and encrypted cloud storage and file hosting services. One of the recovery seeds is associated with the same cryptocurrency wallet that was used to send cryptocurrency to the graphic designed discussed above. In addition, this wallet received approximately \$4,590 worth of bitcoin from Kingdom, and then sent approximately the same amount of bitcoin to a cryptocurrency account held in BILL's name.

g. BILL's email account has a saved video file that shows an individual accessing the back end administrative functions of Kingdom, including to address customer disputes and tickets.

h. BILL's Google account was used to search for terms such as "kingdom Market", "alpha bay Litecoin icon", and "server housing" on October 1, 2020, which is approximately five months before Kingdom became active.

i. BILL's Apple iCloud backup contains numerous text messages where BILL is asking others to communicate with him on encrypted messaging applications, such as Wickr, WhatsApp and Telegram.

Controlled Buys

16. Over the course of the investigation, your affiant, working with other law enforcement officers, has participated in several controlled purchases of illegal narcotics and other illegal goods and services from various Kingdom vendors, including the following, that were delivered to the Eastern District of Missouri:

⁵ Cryptocurrency recovery phrases, also known as "seed phrases" or "recovery seeds," consist of a string of - typically - 12 or 24 words, drawn from a set dictionary of 2,048 words (BIP39 dictionary). This phrase is generated by the cryptocurrency wallet software upon creation of a user's cryptocurrency wallet, and can be used to restore or recreate the wallet. Because the phrase can be used to recreate a wallet, anyone with access to the phrase would have access to the funds held in the wallet, so users are cautioned to be very careful with their phrase and to store it in a secure location. For this reason, absent other indicators, an individual in possession of a cryptocurrency recovery phrase can be reasonably believed to be the owner/creator/possessor of the associated wallet.

Approx. Purchase Date	Approx. Purchase Amount	Item Purchased
4/23/23	\$72 USD	Personally Identifiable Information (PII) ⁶ of 5 individuals (P.F., K.H., M.G., A.S. and A.P.) and more than 5 authentication features related to numerous different State drivers' licenses
10/10/23	\$115 USD	3.5 grams crystal meth
10/10/23	\$90 USD	3.5 grams crystal meth
8/10/23	\$190 USD	50 M30 pills

17. The Drug Enforcement Administration (DEA) analyzed the crystal meth purchased on October 10, 2023, and concluded that one purchase contained 3.556 grams and the other purchase contained 3.520 grams of actual methamphetamine, for a total amount of more than 7 grams of actual methamphetamine.

18. The DEA analyzed the M30 pills purchased on August 10, 2023, and concluded that they contained 5.460 grams (+/- 0.002 grams) of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]propenamide) (Fentanyl).

Conclusion

19. Based on the foregoing, I believe there is probable cause to conclude that, beginning in approximately June 2020 and continuing until December 13, 2023, in the Eastern District of Missouri, and elsewhere, **ALAN BILL, a/k/a "Vend0r," a/k/a "KingdomOfficial,"** and others known and unknown, did knowingly and intentionally conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States, and that it was part and an object of the conspiracy that the defendant, and others known and unknown, would and did distribute controlled substances, including but not limited to fentanyl and more than 5 grams of actual methamphetamine, all Schedule II controlled substances, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), and punishable under 841(b)(1)(B)(viii) and (b)(1)(C).

20. Based on the foregoing, I further believe there is probable cause to conclude that, beginning in January 2020 and continuing until December 13, 2023, in the Eastern District of Missouri, and elsewhere, **ALAN BILL, a/k/a "Vend0r," a/k/a "KingdomOfficial,"** and others known and unknown, did knowingly and intentionally conspire, confederate, and agree together and with each other to commit identity theft,

⁶ The PII purchased for the various victims includes name, date of birth, social security number, and address.

and that it was part and an object of the conspiracy that the defendant, and others known and unknown, would and did knowingly possess and transfer without lawful authority the means of identification of other persons with the intent to commit, or to aid or abet, or in connection with, any unlawful activity that constitutes a violation of Federal law, or that constitutes a felony under any applicable State or local law, in violation of 18 U.S.C. §§ 1028(f) and (a)(7).


21. Based on the foregoing, I further believe there is probable cause to conclude that, beginning in January 2020 and continuing until December 13, 2023, in the Eastern District of Missouri, and elsewhere, **ALAN BILL, a/k/a “Vend0r,” a/k/a “KingdomOfficial,”** and others known and unknown, did knowingly conspire, confederate, and agree together and with each other to commit money laundering, and that it was part and an object of the conspiracy that the defendant, and others known and unknown, would and did knowingly conduct financial transactions affecting interstate and foreign commerce, which involved the proceeds of specified unlawful activities, including: distribution of a controlled substance in violation of Title 21, United States Code, Section 841 (a)(1), 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 such specified unlawful activity, and that while conducting the financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of 18 U.S.C. §§ 1956(h) and (a)(1)(B)(i).

I state under the penalty of perjury that the foregoing is true and correct.

/s/ David Ogurek

DAVID J. OGUREK
Special Agent
Federal Bureau of Investigation (FBI)

Sworn to, attested to, or affirmed before me via reliable electronic means pursuant to Federal Rules of Criminal Procedure 4.1 and 41 on
December 14 _____, 2023.



JOSEPH S. DUEKER
United States Magistrate Judge
Eastern District of Missouri