

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

UNITED STATES OF AMERICA,

Plaintiff,

V.

DOMINIC LACROIX,
YAN OUELLET,
SABRINA PARADIS-ROYER,

Defendants.

INDICTMENT

CASE NO.

Title 18, United States Code,
Sections 1343, 1348, 1349,
1956(h), and 2

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NORTHERN DISTRICT OF OHIO
CLEVELAND

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GENERAL ALLEGATIONS

JUDGE GAUGHAN

At all times relevant to this Indictment:

I. Defendants and Other Entities

1. Defendant DOMINIC LACROIX was a citizen of Canada and a resident of Quebec City, Quebec, Canada.
2. Defendant YAN OUELLET was a citizen of Canada and a resident of Quebec City, Quebec, Canada.
3. Defendant SABRINA PARADIS-ROYER was a citizen of Canada and a resident of Quebec City, Quebec, Canada. PARADIS-ROYER was the romantic partner of LACROIX and resided with LACROIX.
4. PlexCorps was an unincorporated entity based in Quebec City, Quebec, Canada, that was formed in or around May 2017. PlexCorps operated the website www.plexcorps.com and marketed a purported digital cryptocurrency called PlexCoin. LACROIX controlled the daily operations of PlexCorps and was the *de facto* owner of PlexCorps.

5. Sidepay Limited (“Sidepay”), Company Number 10970117, was a private limited company organized under the laws of England and Wales on or about September 19, 2017, with a stated registered address of 72 High Street, Haslemere, Surrey, United Kingdom GU27. The Certificate of Incorporation for Sidepay listed PARADIS-ROYER as a “Person with Significant Control.”

6. Stripe, Inc. (“Stripe”) was a corporation organized under the laws of the State of Delaware with a principal place of business in San Francisco, California, that offered online payment processing platforms for internet businesses. From on or about May 1, 2017, through on or about October 31, 2017, Stripe used Amazon Web Services servers located in Oregon, California and Virginia to run Stripe’s payment processing services software.

II. Background on Digital Tokens or Coins

7. In general, cryptocurrencies were peer-to-peer digital asset and payment systems. Transactions on these systems occurred directly between users, without intermediaries. These transactions were tracked and recorded on a publicly distributed ledger called a “blockchain.” Each block contained a batch of transaction records, including a timestamp and a reference to the previous block, which linked the blocks together in a chain. A blockchain used cryptography to process and verify transactions on the ledger.

8. In the context of a legitimate cryptocurrency, an initial coin offering (“ICO”) was a fundraising event in which an issuer offered participants a unique “coin” or “token” in exchange for consideration such as other cryptocurrencies or fiat currencies. Coins were issued on a blockchain and entitled holders to certain rights related to a venture underlying the ICO, such as rights to profits, shares of assets, use of certain services provided by the issuer, and/or

voting rights. Often, coins were listed on online platforms, or virtual currency exchanges, and tradable for other cryptocurrencies or fiat currencies.

9. Issuers announced and promoted ICOs through public online channels. Issuers typically released a “White Paper” describing the project and the terms of the ICO. To participate in the ICO, investors were required to transfer funds to the issuer’s unique address, online wallet, payment processor, or other account. After the completion of the ICO, the issuer distributed its coin to the participants’ unique address on the blockchain.

III. The SEC and Securities Regulations

10. The United States Securities and Exchange Commission (“SEC”) was an independent agency of the United States, which was charged by law with protecting investors by regulating and monitoring, among other things, the offer and sale of securities, including through unrestricted ICOs made generally available to the public.

11. Federal securities laws and regulations prohibited fraud in connection with the purchase and sale of securities, including the use of false and misleading statements and the failure to disclose material information to the public.

12. Title 15, United States Code, Section 78j(b), made it unlawful for any person, directly or indirectly, by the use of any means or instrumentality of interstate commerce or of the mails, or of any facility of any national securities exchange, to use or employ, in connection with the purchase or sale of any security, any manipulative or deceptive device or contrivance in contravention of such rules and regulations as the SEC may prescribe as necessary or appropriate in the public interest or for the protection of investors, including: (a) employing devices, schemes, and artifices to defraud; (b) making untrue statements of 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 (c) engaging in acts, practices, and courses of business which operated as a fraud upon investors, in connection with the purchase and sale of any security.

IV. PlexCorps and PlexCoin

A. The PlexCoin ICO

13. In or around June 2017, PlexCorps began promoting PlexCoin to the public as a new digital cryptocurrency offered and sold through an ICO. In or around August 2017, PlexCorps published a whitepaper for PlexCoin entitled “PlexCoin: The Next Cryptocurrency” (“Whitepaper”), which was available for review on the internet by potential investors.

14. The Whitepaper described PlexCorps’ mission as “mak[ing] the cryptocurrency technology accessible to all by simplifying its management and use to the maximum.” It claimed that PlexCorps consisted of “a team of 53 people, men and women from all over the world” with offices “currently based in the heart of Singapore.” According to the Whitepaper, “[e]xperts of their own field [brought] their contribution to our ambitious project,” including “former managers of the finance field; prosperous company founders; specialists in private funds management; lawyers, notaries, accountants, and renowned tax experts; a business development manager; a risk management supervisor; a regulations manager; [and] a marketing manager.” To protect “our projects’ security” and prevent poaching by competitors, the Whitepaper insisted that the identity of PlexCorps’ “executives” remained anonymous.

15. The Whitepaper explained the terms of the PlexCoin ICO, which it described as a means of “crowdfunding.” It promoted PlexCoin as “an entirely decentralized open code global currency” whose “value [was] based on the current market.” According to the Whitepaper, the purpose of the PlexCoin ICO was to allow investors to “[t]ake control of [THEIR] money!”

16. The White Paper explained that the PlexCoin ICO “pre-sale” would run from on or about August 7, 2017, through on or about September 5, 2017. PlexCorps anticipated the sale of 400 million PlexCoin during the pre-sale period. The PlexCoin “pre-sale” would occur in “four gradual sale levels,” in which the earliest investors could purchase PlexCoin for the lowest price. According to the Whitepaper, PlexCorps planned to sell the first 50 million PlexCoin at the equivalent of \$0.13 U.S. dollars (“USD”), the second 50 million PlexCoin at the equivalent of \$0.28 USD, the following 100 million PlexCoin at the equivalent of \$0.53 USD, and the last 200 million PlexCoin at the equivalent of \$0.88 USD.

17. According to the Whitepaper, PlexCorps would allocate the funds raised from the PlexCoin ICO sale as follows: 70% for Market Maintenance, 10% for Development, 7% for Operations, 5% for Security, 5% for Marketing and 3% for Legal. Using the majority of the pre-sale earnings for Market Maintenance “will ensure a consistent increase of PlexCoin’s value, even if members sell their assets massively.” The Whitepaper pledged: “Regardless of the received amount, the funds will always be used in these proportions.”

18. Based on the PlexCoin ICO’s discounted purchasing structure, the Whitepaper projected returns on investment (“ROI”) dependent on the stage at which the investor purchased PlexCoin. The Whitepaper “expected” that, if all 400 million PlexCoin were sold, the earliest investors in PlexCoin would receive an ROI after 29 days or less of 1,354%. The Whitepaper maintained: “These numbers might seem enormous, but they are real.” The chart below summarized the sale levels, purchase price, and projected ROI set forth in the Whitepaper:

| Sale Level | Number of PlexCoin Sold | Purchase Price | ROI Within 29 Days |
|------------|-------------------------|----------------|--------------------|
| 1 | 0 to 50 million | \$0.13 | 1,354% |
| 2 | 50 to 100 million | \$0.28 | 629% |
| 3 | 100 to 200 million | \$0.53 | 332% |
| 4 | 200 to 400 million | \$0.88 | 200% |

19. The Whitepaper promised PlexCoin investors ROI stemming from the appreciation in value of PlexCoin through investments PlexCorps would make with the proceeds of the PlexCoin ICO, including to “develop and design” three related products: PlexWallet, PlexCard, and PlexBank. It promised that PlexCorps would distribute profits from these enterprises to PlexCoin investors, stating that, after collecting fees, “[t]he company will then offer this profit to its members after the pre-sale.” It also indicated that PlexCorps would make money from a 2% transaction fee charged during the use of the PlexCard, which would “ensure greater profitability” and enable PlexCorps “to guarantee a profit margin during the pre-sale to our founding members.”

20. The Whitepaper contained five-year financial forecasts for the PlexCorps enterprise, which ranged from a “conservative” estimate of more than \$77 million in profits to nearly \$6 billion in profits under the “optimistic” view.

B. Investments in the PlexCoin ICO

21. Investors were permitted to invest in PlexCoin beginning on or about August 7, 2017. To invest in PlexCoin, an individual needed only to register on the PlexCoin website by providing an email address. There were no other investor requirements or restrictions. There was no registration statement filed with the SEC or in effect during the PlexCoin ICO.

22. During the ICO, investors purchased PlexCoin using a variety of methods. Investors tendered digital currency, such as Bitcoin, Ether and Litecoin, to wallet addresses on a blockchain. Investors also tendered fiat currency, including USD and Canadian dollars (CAD), and provided credit card information through payment portals available on the PlexCoin website or through U.S.-based online payment processors such as PayPal, Square, or Stripe.

23. After making a purchase, an investor typically received one or more communications from PlexCorps or PlexCoin via email.

24. The first transfer of PlexCoin occurred on or about August 13, 2017, and the PlexCoin ICO continued until at least on or about October 1, 2017. During the ICO, investors purchased approximately \$8,000,000 USD worth of PlexCoin.

COUNT 1

(Conspiracy to Commit Securities Fraud and Wire Fraud, 18 U.S.C. § 1349)

The Grand Jury charges:

25. The factual allegations contained in Paragraphs 1 through 24 are re-alleged and incorporated as though fully set forth herein.

26. From on or about May 24, 2017, through on or about December 4, 2017, the exact dates being unknown to the Grand Jury, within the Northern District of Ohio, Eastern Division, and elsewhere, Defendants DOMINIC LACROIX, YAN OUELLET and SABRINA PARADIS-ROYER, and others known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree with each other, and with others both known and unknown to the Grand Jury, to commit federal criminal offenses, to wit:

a. To defraud any person in connection with any security of an issuer with a class of securities registered under section 12 of the Securities Exchange Act of 1934 and that is required to file reports under section 15(d) of the Securities Exchange Act of 1934; and to obtain, by means of false and fraudulent pretenses, representations, and promises, any money and property in connection with the purchase and sale of any security of an

issuer described herein, in violation of Title 18, United States Code, Section 1348 (Securities Fraud); and

b. To devise and intend to devise a scheme and artifice to defraud the investors, and to obtain money by means of false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice, to transmit and cause the transmission by means of wire communications in interstate commerce any writing, sign, signal, and picture, in violation of Title 18, United States Code, Section 1343 (Wire Fraud).

OBJECTS OF THE CONSPIRACY

27. The objects of the conspiracy were to: (1) induce investors to transmit digital and fiat currencies to accounts controlled by Defendants under the guise of purchasing PlexCorps' purported cryptocurrency, PlexCoin, through an ICO; (2) defraud the investors; (3) prevent detection of the conspiracy; and (4) enrich the conspirators.

MANNER AND MEANS OF THE CONSPIRACY

28. It was part of the conspiracy that:

a. Defendants and their co-conspirators marketed and promoted PlexCorps and the PlexCoin ICO to the public, including within the Northern District of Ohio, Eastern Division, via social media and publicly accessible Internet websites.

b. In connection with the PlexCoin ICO, Defendants and their co-conspirators induced investors to purchase PlexCoin by making and causing to be made materially false and fraudulent representations of fact to obtain money and property from investors, including the following:

i. That PlexCoin was an entirely decentralized currency;

ii. That PlexCorps' management consisted of a global "team" of financial, managerial and other subject-matter experts headquartered in Singapore;

iii. That the proceeds of the PlexCoin ICO would be used to develop other PlexCorps products; and

iv. That investors would receive significant returns on investment stemming from profit distributions from the PlexCorps enterprise and reinvestment efforts by PlexCorps' managerial team.

c. In connection with the PlexCoin ICO, Defendants and their co-conspirators induced investors to purchase PlexCoin by omitting material facts necessary to make the statements made, in light of the circumstances under which they were made, not misleading, including the following:

i. That LACROIX was the *de facto* owner and manager of PlexCorps and PlexCoin;

ii. That LACROIX pleaded guilty before a Quebec court to securities fraud and was the subject of previous orders by the Quebec Financial Markets Administrative Tribunal (the "Quebec Tribunal") enjoining him from future violations of the Quebec Securities Act;

iii. That in or around July 2017, the Quebec Tribunal specifically enjoined LACROIX from engaging in the unregistered offering of PlexCoin;

iv. That on or about September 21, 2017, the Quebec Tribunal similarly enjoined PARADIS-ROYER from engaging in the unregistered offering of PlexCoin;

v. That Defendants and their co-conspirators regularly transferred investor funds to fiat currency accounts and cryptocurrency addresses belonging to Defendants and under Defendants' control; and

vi. That Defendants and their co-conspirators converted investor funds to their own use and benefit, including spending investor funds on home renovation projects and daily living expenses.

d. Defendants and their co-conspirators concealed the diversion of investor funds to LACROIX by transferring investor money through other entities and through accounts owned and/or controlled by PARADIS-ROYER.

ACTS IN FURTHERANCE OF THE CONSPIRACY

29. In furtherance of the conspiracy and to achieve its objectives, one or more members of the conspiracy committed the following acts in furtherance, among others, in the Northern District of Ohio, Eastern Division, and elsewhere:

a. On or about May 24, 2017, LACROIX registered and paid for the following web domains, which Defendants used to promote PlexCorps and PlexCoin and were accessible via the internet to potential investors: www.PlexCoin.org, www.PlexCoin.com, www.PlexCoinfoundation.org, Plexcoin.Tech, www.PlexCoinfoundation.com, Plexcoin.cc, www.plexbank.com, www.plexbank.org, and www.plexwallet.com, Plexcoin.group, Plexcoin.live, Plexcoin.org, Plexcorps.org, Plexcorps.tech.

b. On or about June 14, 2017, LACROIX sent an SMS text message to OUELLET stating: "Don't forget when you talk about plex, it's not me that did that! You don't know, you just saw it somewhere. It has to stay super secret."

c. On or about June 27, 2017, OUELLET opened an account at Payward Pte Singapore (d/b/a Kraken) cryptocurrency exchange.

d. On or about July 1, 2017, LACROIX registered and paid for Internet security services from Cloudflare, Inc. for the following URLs: www.PlexCoin.com, www.PlexCoin.org, Plexcoin.cc, Plexcorps.tech, and www.PlexCorps.com.

e. On or about July 3, 2017, LACROIX and OUELLET created and caused to be created a Facebook page for PlexCorps with the Facebook address @PlexCorps.

f. On or about July 5, 2017, LACROIX and OUELLET posted and caused to be posted on the @PlexCorps Facebook page a statement that PlexCorps consisted of “a group of roughly forty people (programmers, engineers, cryptocurrency specialists, etc.) all independent throughout the world and oriented toward the same goal: ‘To increase accessibility to cryptoservices by simplifying its managing process.’; and that PlexCorps “decided not to reveal the identities of our team to make sure no one is getting harassed on social media or recruited by other cryptocurrency companies, thus preventing the concept of PlexCorps from being copied. However, be assured we will be very transparent with our customers concerning our project and finances.”

g. On or about July 6, 2017, LACROIX and OUELLET posted and caused to be posted to the www.PlexCoin.com website instructions for investing, which instructed users to provide their email address so that “at the launch of the pre-sale on August 7th, you will be able to buy your PlexCoin with a discount and in priority to enjoy a return of 1354% on your investment!”

h. On or about the dates and times listed below, LACROIX and OUELLET sent the following messages via Skype, each message constituting a separate act in furtherance:

| | Date/Time | Sender | Recipient | Content |
|----|--------------------------|---------------|------------------|--|
| 1 | July 25, 2017 7:38PM | LACROIX | OUELLET | I'm gonna get it up to 100k subscribers |
| 2 | July 25, 2017 11:48PM | OUELLET | LACROIX | There is progress on my end the prod backend is ready for the transactions and everything That can also apply to your coinmarket... I can add the app on it |
| 3 | July 25, 2017 11:49PM | OUELLET | LACROIX | Left to add the right number and Plexcoin the dev looks like this |
| 4 | July 26, 2017 10:29AM | OUELLET | LACROIX | Will you install telegram [portion omitted] |
| 5 | July 26, 2017 10:30AM | OUELLET | LACROIX | I created a box techsupport@plexcoin.com the girls' question / technical problem will go there No more Internal skype |
| 6 | July 26, 2017 6:31PM | LACROIX | OUELLET | Looking forward to see you tomorrow I'll have news from the bank |
| 7 | July 26, 2017 6:32PM | OUELLET | LACROIX | I also took the keys out of the wallets containing the plexes to give you a copy |
| 8 | July 26, 2017 6:41PM | OUELLET | LACROIX | I don't know if you saw the article on Conseiller.ca released 2 days ago? |
| 9 | July 26, 2017 6:41PM | OUELLET | LACROIX | retells the AMF stuff a bit... nothing serious I even think it's flattering |
| 10 | July 26, 2017 6:41PM | LACROIX | OUELLET | Nothing new Yeah it's quiet I post the press release in private to each person who speaks |
| 11 | July 26, 2017 6:42PM | LACROIX | OUELLET | Press Release "PlexCorps confirms, in contradiction with the allegations of the AMF ("autorité des marchés financiers") from the Quebec province in Canada, that the headquarter of PlexCorps and its products PlexCoin, PlexWallet, PlexCard, and PlexBank, are located in Singapore and thus subject to the laws in effect in Singapore." [portion omitted] |
| 12 | July 26, 2017 6:56PM | LACROIX | OUELLET | we're at 74k with 11 days left |
| 13 | July 26, 2017 6:56PM | OUELLET | LACROIX | I'm thinking 80,000 |
| 14 | July 26, 2017 7:54PM | LACROIX | OUELLET | At the gym, all the websites work on the machine except plexcoin and plexcorps [portion omitted] |

| | Date/Time | Sender | Recipient | Content |
|----|--------------------------|---------------|------------------|---|
| 15 | July 26, 2017 7:54PM | OUELLET | LACROIX | Do you have a picture of what it's saying?? |
| 16 | July 26, 2017 7:55PM | LACROIX | OUELLET | Yes, I'm going back |
| 17 | July 26, 2017 7:55PM | OUELLET | LACROIX | Maybe it's blocked??? Maybe it doesn't support cloudflare that's really weird |
| 18 | July 26, 2017 7:55PM | LACROIX | OUELLET | Do we have another site on cloudflare? |
| 19 | July 26, 2017 7:55PM | OUELLET | LACROIX | no, but box03.plexcorps.com doesn't go through cloudflare |
| 20 | July 26, 2017 8:04PM | LACROIX | OUELLET | There are lots of people posting job offers for PlexCoin lol. that's good, that muddies the water. |
| 21 | July 26, 2017 8:09PM | OUELLET | LACROIX | I can't wait until the cash comes in. |
| 22 | July 26, 2017 8:09PM | LACROIX | OUELLET | I'm happy just to be on FB because if we weren't it would be too hard to control |
| 23 | July 26, 2017 10:28PM | OUELLET | LACROIX | I've encrypted everything at our place. I checked it afterwards to wipe all my servers too. I removed every trace. we have to stop using skype. if not, there's no use in doing all that. |
| 24 | July 26, 2017 10:29PM | LACROIX | OUELLET | You're thinking the fbi and grc? |
| 25 | July 26, 2017 10:30PM | OUELLET | LACROIX | Well, if it catches on. If a lot of people get upset. |
| 26 | July 26, 2017 10:40PM | LACROIX | OUELLET | I'm starting Singapore tomorrow too or soon I know I told you |
| 27 | July 26, 2017 10:40PM | OUELLET | LACROIX | if not, I'll keep searching to find alternatives to talk about with you In the meantime I'll focus on the blockchain and what to do there |
| 28 | July 27, 2017 9:13AM | LACROIX | OUELLET | The bank refuses And starting to refuse to offer any other service |
| 29 | July 27, 2017 10:30AM | LACROIX | OUELLET | Could we try Paypal? |
| 30 | July 27, 2017 10:31AM | OUELLET | LACROIX | I'm checking right now Paypal... there are limits If you're not fully checked Let me see my US account What limits I have |
| 31 | July 27, 2017 10:37AM | OUELLET | LACROIX | And Paypal, they can pay by check Instead of a deposit Into a bank So we could deposit the check anywhere or |
| 32 | July 27, 2017 10:38AM | LACROIX | OUELLET | They can keep the funds |
| 33 | July 27, 2017 10:38AM | OUELLET | LACROIX | Yes |

| | Date/Time | Sender | Recipient | Content |
|----|--------------------------|---------------|------------------|---|
| 34 | July 27, 2017 10:38AM | LACROIX | OUELLET | And shift them into another Paypal |
| 35 | July 27, 2017 10:38AM | OUELLET | LACROIX | Yes |
| 36 | July 27, 2017 10:40AM | LACROIX | OUELLET | But that would certainly a take a Paypal on behalf of Plexcorps And elsewhere |
| 37 | July 27, 2017 10:43AM | OUELLET | LACROIX | Yes Paypal is like Stripe You have to link a bank from your country Except that it lets you send a check |
| 38 | July 27, 2017 10:51AM | OUELLET | LACROIX | I'm checking into opening a Paypal |
| 39 | July 27, 2017 10:51AM | LACROIX | OUELLET | On behalf of Plexcorps? |
| 40 | July 27, 2017 10:51AM | OUELLET | LACROIX | Yes |
| 41 | July 27, 2017 11:28AM | OUELLET | LACROIX | The Citibank International Personal Bank Singapore Account is available to applicants who are 21 years old and above, with a minimum funding of US\$200,000. The only criteria. |
| 42 | July 27, 2017 11:31AM | LACROIX | OUELLET | The problem is that if I send 200K from my personal account, the AMF will see it. |
| 43 | July 27, 2017 11:31AM | OUELLET | LACROIX | I know. |
| 44 | July 27, 2017 11:31AM | LACROIX | OUELLET | And they'll connect the two accounts right away. So that's out of the question. So all that's left is PayPal. |
| 45 | July 27, 2017 11:33AM | LACROIX | OUELLET | If PayPal doesn't work, I'm going to have to announce it on Facebook and tell people to prepare for it as best they can. To buy eth or btc. |
| 46 | July 27, 2017 12:08PM | LACROIX | OUELLET | Okay, well if we don't have PayPal by the end of the day, I'm going to post that we're not giving the cards back because . . . |
| 47 | July 27, 2017 12:09PM | LACROIX | OUELLET | company cannot guarantee the safety and confidentiality of our customers, so since our mission is confidentiality, we prefer to drop the payment by credit card for the moment. A well written press release and translated by d! we will put this on the fault of the suppliers who do not have the adequate technology to follow us |
| 48 | July 27, 2017 12:15PM | LACROIX | OUELLET | It's not confidential enough, more easily traceable. amf can make a purchase with their |

| | Date/Time | Sender | Recipient | Content |
|----|--------------------------|---------|-----------|---|
| | | | | card and would see where their money goes. So not safe for other card shoppers. |
| 49 | July 27, 2017 3:24PM | OUELLET | LACROIX | there's also wavecrest here.. who aren't happy |
| 50 | July 27, 2017 3:49PM | OUELLET | LACROIX | visa contacted them aren't happy |
| 51 | July 27, 2017 4:07PM | OUELLET | LACROIX | Plexcoin isn't authorized to use the service offered by WaveCrest, including, but without being limited to, the delivery or transmission of our cards. If you try to perform such an action, WaveCrest will follow any legal recourse against you and any other parties who perform such an action. |
| 52 | July 27, 2017 4:08PM | OUELLET | LACROIX | visa also wrote back to say that wavecrest had told them that we didn't have any connection |
| 53 | July 27, 2017 5:46PM | LACROIX | OUELLET | I can't wait for the 5th here but more for the 4th to bring out the whitepaper |
| 54 | July 27, 2017 10:18PM | LACROIX | OUELLET | do you think that fb keeps my page active bcz I give them \$ 5000 a day? |
| 55 | July 27, 2017 10:19PM | OUELLET | LACROIX | Facebook are going to see your good faith if they check |
| 56 | July 27, 2017 10:22PM | LACROIX | OUELLET | in the term and condition I will also put "I'm not from Quebec, Canada" in addition to USA. In addition to the USA |

i. On or about August 2, 2017, LACROIX and PARADIS-ROYER sent the following SMS text messages, which occurred while Canadian authorities were attempting to execute a search warrant at their shared residence, each message constituting a separate act in furtherance:

| | Sender | Recipient | Content |
|---|---------------|-----------|---------------------------------|
| 1 | PARADIS-ROYER | LACROIX | Yo man ! |
| 2 | PARADIS-ROYER | LACROIX | I think the police are here |
| 3 | PARADIS-ROYER | LACROIX | I'm not answering |
| 4 | PARADIS-ROYER | LACROIX | This isn't funny any more |
| 5 | PARADIS-ROYER | LACROIX | The white paper is on the table |
| 6 | PARADIS-ROYER | LACROIX | I don't want to answer |

j. On or about August 4, 2017, LACROIX and OUELLET published and caused to be published the WhitePaper for PlexCoin entitled “PlexCoin: The Next Cryptocurrency,” which was available for review on the internet by potential investors.

k. On or about August 9, 2017, LACROIX registered and paid for Internet security services from Cloudflare, Inc. for the URL: <http://www.plexcoin.tech>.

l. On or about August 13, 2017, OUELLET created the PlexCoin token on the Ethereum Blockchain utilizing the token contract address ending in 52DDD6, the source code for which instructed all tokens be awarded to the contract creator.

m. On or about August 15, 2017, LACROIX opened an account at Payward Pte Singapore (d/b/a Kraken) cryptocurrency exchange.

n. On or about August 16, 2017, LACROIX and PARADIS-ROYER registered and caused to be registered an account at Shopify in the name of PARADIS-ROYER for the business SidePay using the email address doom.lacroix@hotmail.com.

o. On or about August 17, 2017, PARADIS-ROYER opened and caused to be opened an account at Payward Pte Singapore (d/b/a Kraken) cryptocurrency exchange.

p. On or about August 31, 2017, LACROIX registered and paid for Internet security services from Cloudflare, Inc. for the URL: <https://www.sidepay.ca>.

q. On or about August 31, 2017, PARADIS-ROYER registered and caused to be registered account ending in ZwRO6 at Stripe under the business name “SP*SIDEPAY” using the email address doom.lacroix@hotmail.com and the URL [sidepay.ca](https://www.sidepay.ca).

r. On or about September 6, 2017, PARADIS-ROYER registered and caused to be registered account ending in B79n8 at Stripe under the business name "SIDEPAY" using the email address sabrina.paradis@hotmail.fr and the URL <http://sidepay.ca>.

s. On or about September 10, 2017, PARADIS-ROYER, using the email address info@sidepay.ca, created and caused to be created an account at PayPal in the name of PARADIS-ROYER for the business Sidepay listing the URL <http://www.sidepay.ca>.

t. On or about September 10, 2017, in response to an email from a Shopify representative identifying a "high-risk flag associated with [your account]" and recommending "you take action in confirming the legitimacy," PARADIS-ROYER sent an email to Shopify stating, in part: "Thank you for your advice, we will validate high-risk client information before approving it or refund if we are not satisfied."

u. On or about September 10, 2017, LACROIX, OUELLET and PARADIS-ROYER caused R.S., a resident of Chesterland, Ohio, to purchase \$200 in PlexCoin using a credit card associated with Capital One Bank, which transaction was then routed by Stripe to account number x4189 at Royal Bank of Canada in the name of PARADIS-ROYER.

v. On or about September 12, 2017, LACROIX, OUELLET and PARADIS-ROYER caused S.A., a resident of Stow, Ohio, to purchase \$260 in PlexCoin using a debit card associated with PNC Bank, which transaction was then routed by Stripe to account number x4189 at Royal Bank of Canada in the name of PARADIS-ROYER.

w. On or about September 25, 2017, LACROIX, OUELLET and PARADIS-ROYER caused K.A., a resident of Stow, Ohio, to purchase \$200 in PlexCoin using a

debit card associated with PNC Bank, which transaction was then routed by Stripe to account number x7453 at Tangerine Bank in the name of LACROIX.

All in violation of Title 18, United States Code, Section 1349.

COUNTS 2-4

(Wire Fraud, 18 U.S.C. §§ 1343 and 2)

The Grand Jury further charges:

30. The factual allegations contained in paragraphs 1 through 24 and 29 of the Indictment are re-alleged and incorporated by reference as if fully set forth herein.

31. From on or about May 24, 2017, through on or about December 4, 2017, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants DOMINIC LACROIX, YAN OUELLET, and SABRINA PARADIS-ROYER knowingly devised, and intended to devise, a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

32. On or about the dates listed below, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants, for the purpose of executing and attempting to execute the foregoing scheme and artifice, transmitted and caused to be transmitted, writings, signs, signals, pictures, and sounds by means of wire and radio communication, in interstate commerce, to wit: electronic transfers of funds, in the approximate amounts described below, that Defendants caused to be sent by investors located within the Northern District of Ohio and received by Defendants, as described below:

| Count | Date | Investor Initials | Amount | Origination/ Location | Recipient/ Location |
|-------|--------------------|-------------------|--------|---|--|
| 2 | September 10, 2017 | R.S. | \$200 | Capital One Bank credit card payment initiated from R.S.'s residence in Chesterland, Ohio | PARADIS-ROYER account number x4189 at Royal Bank of Canada in Quebec, Canada |
| 3 | September 12, 2017 | S.A. | \$260 | PNC Bank debit card payment initiated from S.A.'s residence in Stow, Ohio | PARADIS-ROYER account number x4189 at Royal Bank of Canada in Quebec, Canada |
| 4 | September 25, 2017 | K.A. | \$200 | PNC Bank debit card payment initiated from K.A.'s residence in Stow, Ohio | LACROIX account number x7453 at Tangerine Bank in Quebec, Canada |

All in violation of Title 18, United States Code, Sections 1343 and 2.

COUNT 5

(Conspiracy to Commit Money Laundering, 18 U.S.C. § 1956(h))

The Grand Jury further charges:

33. The factual allegations contained in paragraphs 1 through 24 and 29 of the Indictment are re-alleged and incorporated by reference as if fully set forth herein.

34. From in or around May 2017 through in or around December 2017, the exact dates being unknown to the Grand Jury, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants DOMINIC LACROIX and SABRINA PARADIS-ROYER, and others both known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate and agree together to knowingly and intentionally conduct and attempt to conduct a series of financial transactions affecting interstate commerce, which transactions involved the proceeds from a specified unlawful activity; that is, violations of Title 18, United States Code, Section 1343, knowing that the transactions involved the proceeds of some form of unlawful activity, and knowing that they were engaging in a monetary transaction in criminally derived

property of a value greater than \$10,000 derived from said unlawful activity, in violation of Title 18, United States Code, Section 1957.

ACTS IN FURTHERANCE OF THE CONSPIRACY

35. In furtherance of the conspiracy and to achieve its objectives, one or more members of the conspiracy committed the following acts in furtherance, among others, in the Northern District of Ohio, Eastern Division, and elsewhere:

A. The Royal Bank of Canada Transactions

a. On or about May 23, 2017, PARADIS-ROYER opened and caused to be opened account number x6912 at Royal Bank of Canada in the name of PARADIS-ROYER.

b. On or about September 14, 2017, PARADIS-ROYER opened and caused to be opened account number x4189 at Royal Bank of Canada in the name of PARADIS-ROYER.

c. On or about September 18, 2017, PARADIS-ROYER transferred and caused to be transferred \$399,858.36 USD of investor monies processed through Stripe account ending in ZwRO6 in the name of "SP*SIDEPAY," which listed PARADIS-ROYER as the company representative, to Royal Bank of Canada account number x4189 in the name of PARADIS-ROYER.

d. On or about September 19, 2017, PARADIS-ROYER transferred and caused to be transferred \$246,346.87 USD from Royal Bank of Canada account number x4189 in the name of PARADIS-ROYER to Royal Bank of Canada account number x6912 in the name of PARADIS-ROYER.

e. On or about September 19, 2017, PARADIS-ROYER transferred \$30,000 CAD from Royal Bank of Canada account number x6912 in the name of PARADIS-ROYER to pay off Royal Bank of Canada line of credit account number x9001 in the name of PARADIS-ROYER.

B. The Tangerine Bank Transactions

f. On or about September 20, 2017, LACROIX opened and caused to be opened account number x7453 at Tangerine Bank in the name of LACROIX.

g. On or about September 20, 2017, LACROIX opened and caused to be opened account number x0764 at Tangerine Bank in the name of LACROIX.

h. On or about September 26, 2017, LACROIX opened and caused to be opened account number x3834 at Tangerine Bank in the name of LACROIX.

i. On or about September 25, 2017, PARADIS-ROYER transferred and caused to be transferred \$79,287.60 USD of investor monies processed through Stripe account ending in ZwRO6 in the name of "SP*SIDEPAY," which listed PARADIS-ROYER as the company representative, to Tangerine Bank account number x7453 in the name of LACROIX.

j. On or about September 26, 2017, PARADIS-ROYER transferred and caused to be transferred \$137,467.38 USD of investor monies processed through Stripe account ending in ZwRO6 in the name of "SP*SIDEPAY," which listed PARADIS-ROYER as the company representative, to Tangerine Bank account number x7453 in the name of LACROIX.

k. On or about September 27, 2017, PARADIS-ROYER transferred and caused to be transferred \$251,641.78 USD of investor monies processed through Stripe

account ending in ZwRO6 in the name of "SP*SIDEPAY," which listed PARADIS-ROYER as the company representative, to Tangerine Bank account number x7453 in the name of LACROIX.

l. On or about September 28, 2017, LACROIX transferred and caused to be transferred \$409,909.71 USD from Tangerine Bank account number x7453 in the name of LACROIX to Tangerine Bank account number x3834 in the name of LACROIX.

m. On or about September 28, 2017, LACROIX transferred and caused to be transferred \$49,140.05 USD from Tangerine Bank account number x7453 in the name of LACROIX to Tangerine Bank account number x0764 in the name of LACROIX.

n. On or about October 2, 2017, LACROIX transferred and caused to be transferred \$200,000 CAD from Tangerine Bank account number x3834 in the name of LACROIX to Tangerine Bank account number x0764 in the name of LACROIX.

o. On or about October 4, 2017, LACROIX caused to be deposited check no. 026 in the amount of \$75,000 CAD, drawn on Tangerine Bank account number x0764 in the name of LACROIX, payable to "Ceramique Primo," the memo line for which check stated "468 Manitobains."

p. On or about October 5, 2017, LACROIX caused to be deposited check no. 002 in the amount of \$20,000 CAD, drawn on Tangerine Bank account number x0764 in the name of LACROIX, payable to "Bobby Lyonnais (Lyonnnais électrique)," the memo line for which check stated "468 Manitobains."

q. On or about October 5, 2017, LACROIX caused to be deposited check no. 003 in the amount of \$52,143.792 CAD, drawn on Tangerine Bank account number

x0764 in the name of LACROIX, payable to "Aluminum Frederic Balduc," the memo line for which check stated "468 Manitobains."

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

FORFEITURE

The Grand Jury further alleges:

36. The allegations of Counts 1 through 5 are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C); Title 28, United States Code, Section 2461(c); Title 18, United States Code, Section 982(a)(1). As a result of the foregoing offenses, Defendants DOMINIC LACROIX, YAN OUELLET, and SABRINA PARADIS-ROYER, shall forfeit to the United States all property, real and personal, which constitutes or is derived from proceeds they obtained directly or indirectly as a result of such violations; all property, real and personal, which constitutes or is derived from gross proceeds traceable to the commission of such offenses; and all property, real and personal involved in the commission of such offenses.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.