

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

**FILED**  
**DEC 20 2023**  
**U. S. DISTRICT COURT**  
**EASTERN DISTRICT OF MO**  
**ST. LOUIS**

UNITED STATES OF AMERICA, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 ALAN BILL, )  
 a/k/a "Vend0r" )  
 a/k/a "KingdomOfficial" )  
 )  
 Defendant. )

**4:23CR714 RWS/NCC**

**INDICTMENT**

The Grand Jury charges that:

**BACKGROUND**

At all times material to this Indictment:

1. The defendant **ALAN BILL, a/k/a "Vend0r," a/k/a "KingdomOfficial,"** ("defendant") was a Slovakian national residing in Bratislava, Slovakia.
2. In or around June 2020, the defendant, with other persons, known and unknown to the Grand Jury, began creating Kingdom Market (hereinafter "Kingdom"), a dark web marketplace designed to enable users to buy and sell illegal drugs and other illicit goods and services, including stolen financial information, fraudulent identification documents, counterfeit currencies, and computer malware.
3. In March 2021, Kingdom became operational and was accessible through The Onion Router ("Tor") and the Invisible Internet Project ("I2P"), which anonymize the Internet Protocol ("IP") addresses of its underlying servers in attempt to avoid law enforcement. These

networks made it difficult to identify the true physical locations of Kingdom's users, including its administrators, vendors, and customers.

4. Kingdom had a forum page (/d/KingdomMarket) on Dread, which is a dark web site similar to Reddit commonly used to discuss illegal activities and ways to avoid law enforcement. Kingdom's Dread page lists four moderators, including: "/u/vend0r" (who is identified as the creator of the page), "/u/kingdommarketofficial" (who is identified as "King Admin"), "/u/Papinian3" (who is identified as "Admin"), and "/u/OhLongJohnson" (who is identified as "Support Admin").

5. Kingdom also had a clear web forum site (r/KingdomOfficial) on Reddit. As of December 2023, this site had more than 2,000 members and contained numerous postings, including information on how access and use the Kingdom dark web site and how to avoid law enforcement. Kingdom's Reddit page lists three moderators, including: "u/KingdomOfficial", "u/Papinian3" and "u/OhLongJohnsonKM."

6. Kingdom also maintained two clear web sites – <https://kingdommarket.live> and <https://kingdommarket.so>. These clear web sites provided users with access to the Kingdom dark web site, provided instructions on how Kingdom worked and how to become a vendor, and how to avoid law enforcement.

#### KINGDOM MARKETPLACE AND ITS ADMINISTRATORS

7. Kingdom administrators were responsible for ensuring that Kingdom remained operational, including by maintaining the hosting servers and payment infrastructure, responding to user questions, and resolving disputes between vendors and customers.

8. Kingdom and its administrators required users of the Kingdom dark web marketplace to transact in cryptocurrency, including Bitcoin, Litecoin and Monero. Users were not allowed to transact in official, government-backed currencies.

9. Kingdom required its vendors to make a “vendor bond” payment in cryptocurrency, and also charged several commission fees on transactions, including a deposit fee, a withdrawal fee and a transaction fee.

10. In order to place an order for illicit goods and services on Kingdom, customers would send the required amount of cryptocurrency to a Kingdom escrow account controlled by Kingdom administrators, where the funds would remain until the order was finalized and then released to the vendor.

11. Numerous Kingdom vendors sold a variety of controlled substances, including fentanyl, cocaine, heroin, methamphetamine, LSD, and opioids. Vendors openly advertised their controlled substances on Kingdom, typically including photographs and a description.

12. Numerous other Kingdom vendors offered for sale personally identifying information of individuals, including name, date of birth, social security number, and address. Some of the vendors sold packs or “fullz” of this information for multiple individuals and also included templates of United States passports and State drivers’ licenses, including the State of Missouri.

13. Until it ceased operations on or about December 16, 2023, Kingdom had thousands of listings for sale of illegal drugs and other illicit goods and services worldwide.

**COUNT 1**  
**(Conspiracy to Distribute Controlled Substances)**

14. Beginning in approximately June 2020 and continuing until December 14, 2023, in

the Eastern District of Missouri, and elsewhere,

**ALAN BILL**  
**a/k/a “Vend0r”**  
**a/k/a “KingdomOfficial”**

the defendant herein, and others known and unknown, did knowingly and intentionally conspire, confederate, and agree together and with each other to commit the following offenses:

a. To knowingly and intentionally distribute and cause the distribution of controlled substances, to wit, N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide (commonly referred to as “fentanyl”), a Schedule II Controlled Substance, and actual methamphetamine, a Schedule II controlled substance, in violation of United States Code, Sections 841(a)(1) and 841(b)(1)(C);

b. To knowingly and intentionally deliver, distribute, and dispense and cause the delivery, distribution, and dispensing of controlled substances, to wit, fentanyl and actual methamphetamine, by means of the Internet, in a manner not authorized by law, and aid and abet such activity, in violation of Title 21, United States Code, Section 841(h).

c. To knowingly and intentionally use a communication facility in committing and in causing the facilitating the commission of acts constituting a felony under Title 21, United States Code, Section 841, 846, in violation of Title 21, United States Code, Section 843(b).

15. The total amount of actual methamphetamine involved in the conspiracy that was reasonably foreseeable to the defendant is 5 grams or more, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(B).

Overt Acts

16. In furtherance of the conspiracy and to effect the illegal objects thereof, the

following overt acts, among others, were committed in the Eastern District of Missouri and elsewhere:

a. On or about August 12, 2023, a Kingdom vendor (“Vendor A”) mailed approximately fifty (50) M30 pills to a law enforcement agent acting in an undercover capacity, to a post office box located in St. Louis, Missouri. The package, which arrived in St. Louis, Missouri, on August 12, 2023, had a return address in Northbend, Washington, and contained 5.460 grams of fentanyl as confirmed by laboratory analysis.

b. On or about October 12, 2023, a Kingdom vendor (“Vendor B”) mailed approximately 3.5 grams of crystal methamphetamine to a law enforcement agent acting in an undercover capacity, to a post office box located in Festus, Missouri. The package, which arrived in Festus, Missouri, on October 14, 2023, had a return address of Los Angeles, California, and contained 3.556 grams of actual methamphetamine as confirmed by laboratory analysis.

c. On or about October 12, 2023, a Kingdom vendor (“Vendor C”) mailed approximately 3.5 grams of crystal methamphetamine to a law enforcement agent acting in an undercover capacity, to a post office box located in St. Louis, Missouri. The package, which arrived in St. Louis, Missouri, on October 15, 2023, had a return address of Anaheim, California, and contained 3.520 grams of actual methamphetamine as confirmed by laboratory analysis.

d. On or about October 12, 2023, a Kingdom vendor (“Vendor D”) mailed approximately 7 grams of crystal methamphetamine to a law enforcement agent acting in an undercover capacity, to a post office box located in Festus, Missouri. The package, which arrived in Festus, Missouri, on October 14, 2023, had a return address of Long Beach, California, and contained 6.858 grams of actual methamphetamine as confirmed by laboratory analysis.

All in violation of Title 21, United States Code, Sections 846, 841(a)(1) and (b)(1)(B).

**COUNTS 2, 3 and 4**  
**(Distribution of Controlled Substances)**

The Grand Jury further charges that:

- 17. Paragraphs 1 through 12 are incorporated by reference as if fully set forth herein.
- 18. On or about the dates set forth in the table below,

**ALAN BILL**  
**a/k/a “Vend0r”**  
**a/k/a “KingdomOfficial”**

the defendant herein, with other persons, known and unknown to the Grand Jury, in the Eastern District of Missouri, and elsewhere, through Kingdom, a dark web marketplace, did, and attempted to, knowingly and intentionally distribute, and aid and abet the distribution of the below Schedule II controlled substances:

<b>Count</b>	<b>Purchase Date</b>	<b>Mail Date</b>	<b>Vendor</b>	<b>Purchased Item</b>	<b>Controlled Substance</b>
<b>2</b>	August 10, 2023	August 12, 2023	Vendor A	50 M30 pills	5.460 grams of fentanyl
<b>3</b>	October 10, 2023	October 12, 2023	Vendor B	Crystal meth	3.520 grams of actual methamphetamine
<b>4</b>	October 10, 2023	October 12, 2023	Vendor C	Crystal meth	3.484 grams of actual methamphetamine

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT 5**  
**(Distribution of Controlled Substances)**

The Grand Jury further charges that:

- 19. Paragraphs 1 through 12 are incorporated by reference as if fully set forth herein.

20. On or about the dates set forth in the table below,

**ALAN BILL**  
**a/k/a “Vend0r”**  
**a/k/a “KingdomOfficial”**

the defendant herein, with other persons, known and unknown to the Grand Jury, in the Eastern District of Missouri, and elsewhere, through Kingdom, a dark web marketplace, did, and attempted to, knowingly and intentionally distribute, and aid and abet the distribution of actual methamphetamine, a Schedule II controlled substances:

<b>Count</b>	<b>Purchase Date</b>	<b>Mail Date</b>	<b>Vendor</b>	<b>Purchased Item</b>	<b>Controlled Substance</b>
<b>5</b>	October 10, 2023	October 12, 2023	Vendor D	Crystal meth	6.858 grams of actual methamphetamine

21. The amount of actual methamphetamine attributable to the defendant Alan Bill is 5 grams or more, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(B).

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and Title 18, United States Code, Section 2.

**COUNT 6**  
**(Conspiracy to Commit Identity Theft and Fraud Related to Identification Documents)**

The Grand Jury further charges that:

22. Paragraphs 1 through 12 are incorporated by reference as if fully set forth herein.

23. Beginning in approximately June 2020 and continuing until December 14, 2023, in the Eastern District of Missouri, and elsewhere,

**ALAN BILL**  
**a/k/a “Vend0r”**  
**a/k/a “KingdomOfficial”**

the defendant herein, and others known and unknown, did knowingly and intentionally conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Sections 2, and 1028(a)(1), (a)(5), (a)(7), to wit:

a. To knowingly transfer without lawful authority a means of identification of another person with the intent to commit, or to aid or abet, or in connection with, any unlawful activity that constitutes a violation of Federal law, to wit, knowingly and without lawful authority produces a false identification document, in violation of Title 18, United States Code, Sections 1028(a)(7) and (1), and 2;

b. To knowingly transfer and possess an authentication feature with the intent such authentication feature would be used in the production of a false identification document in violation of Title 18, United States Code, Section 1028(a)(5), and 2;

Overt Acts

24. In furtherance of the conspiracy and to effect the objects and purposes of the conspiracy, the following overt acts, in addition to others, were committed in the Eastern District of Missouri, and elsewhere:

a. On or about August 7, 2022, a Kingdom vendor (“Vendor E”) electronically transmitted a packet to a law enforcement agent acting in an undercover capacity containing name, date of birth, social security number, and address of K.W. together with numerous templates of State drivers’ licenses, including an authentication feature for the State of Missouri;

b. On or about April 23, 2023, a Kingdom vendor (“Vendor F”) electronically



transmitted a packet to a law enforcement agent acting in an undercover capacity containing name, date of birth, social security number, and address of P.F., K.H., M.G., A.S. and A.P. together with numerous templates of State drivers' licenses, including an authentication feature for the State of Missouri;

c. On or about April 23, 2023, Vendor F electronically transmitted a packet to a law enforcement agent acting in an undercover capacity containing name, date of birth, social security number, and address of L.A., S.T., T.H. and W.O. together with numerous templates of State drivers' licenses, including an authentication feature for the State of Missouri;

d. On or about April 23, 2023, Vendor F electronically transmitted a packet to a law enforcement agent acting in an undercover capacity containing name, date of birth, social security number, and address of K.W., T.Z., T.L., T.C. and C.M. together with numerous templates of State drivers' licenses, including an authentication feature for the State of Missouri;

e. On or about April 23, 2023, Vendor F electronically transmitted a packet to a law enforcement agent acting in an undercover capacity containing name, date of birth, social security number, and address of B.D., M.N., G.G., R.P. and G.S. together with numerous templates of State drivers' licenses, including an authentication feature for the State of Missouri;

f. On or about April 23, 2023, Vendor F electronically transmitted a packet to a law enforcement agent acting in an undercover capacity containing name, date of birth, social security number, and address of D.B., R.D., R.F., T.F. and S.O. together with numerous templates of State drivers' licenses, including an authentication feature for the State of Missouri;

g. On or about December 2, 2023, a Kingdom vendor ("Vendor G") mailed a package containing a United States passport book for C.M.P. to a law enforcement agent acting in

an undercover capacity, to a post office box located in St. Louis, Missouri. The package, which arrived in St. Louis, Missouri, on December 12, 2023, had a return address in Atlanta, Georgia.

All in violation of Title 18, United States Code, Sections 1028(f), and 2.

**COUNT 7**  
**(Identity Theft)**

The Grand Jury further charges that:

- 25. Paragraphs 1 through 12 are incorporated by reference as if fully set forth herein.
- 26. On the date set forth in the table below,

**ALAN BILL**  
**a/k/a “Vend0r”**  
**a/k/a “KingdomOfficial”**

the defendant herein, with other persons, known and unknown to the Grand Jury, in the Eastern District of Missouri, and elsewhere, aiding and abetting one another, through Kingdom, a dark web marketplace, did, and attempted to, knowingly transfer without lawful authority a means of identification of another person with the intent to commit, or to aid or abet, or in connection with, a violation of Title 18, United States Code, Section 1028(a)(1), to wit, knowingly and without lawful authority producing a false identification document, and the transfers of such identification documents were in and affected interstate and foreign commerce:

<b>Count</b>	<b>Date</b>	<b>Vendor</b>	<b>Description</b>
7	April 23, 2023	Vendor F	Electronic transfer of the name, date of birth, social security number, and address of K.W., T.Z., T.L., T.C. and C.M. together with numerous templates of State drivers' licenses, including an authentication feature for the State of Missouri

In violation of Title 18, United States Code, Sections 1028(a)(7) and (1), and (f), and 2.

**COUNT 8**  
**(Aggravated Identity Theft)**

27. Paragraphs 1 through 12 are incorporated by reference as if fully set forth herein.

28. On the date set forth in the table below,

**ALAN BILL**  
**a/k/a “Vend0r”**  
**a/k/a “KingdomOfficial”**

the defendant herein, with other persons, known and unknown to the Grand Jury, in the Eastern District of Missouri, and elsewhere, aiding and abetting one another, through Kingdom, a dark web marketplace, knowingly possessed, transferred, and used, without lawful authority, a means of identification of another person, to wit, the name, address, date of birth, and social security numbers of the below individuals, during and in relation to the commission of the felony offense of identity theft, including conspiracy to commit such offense, in violation of Title 18, United States Code, Section 1028(f) and 1028(a)(7) and (1):

<b>Count</b>	<b>Date</b>	<b>Vendor</b>	<b>Description</b>
<b>8</b>	April 23, 2023	Vendor F	Electronic transfer of the name, date of birth, social security number, and address of K.W., T.Z., T.L., T.C. and C.M. together with numerous templates of State drivers’ licenses, including an authentication feature for the State of Missouri

All in violation of Title 18, United States Code, Section 1028A, and 2.

**COUNTS 9**  
**(Misuse of Passport)**

29. Paragraphs 1 through 12 are incorporated by reference as if fully set forth herein.

30. On or about December 2, 2023,

**ALAN BILL**  
**a/k/a “Vend0r”**  
**a/k/a “KingdomOfficial”**

the defendant herein, with other persons, known and unknown to the Grand Jury, including Vendor G, in the Eastern District of Missouri, and elsewhere, aiding and abetting one another, through Kingdom, a dark web marketplace, did, and attempted to, willfully and knowingly furnish, dispose of, and deliver United States passport issued and designed for the use of C.M.P. to a Kingdom customer for use by the Kingdom customer, well knowing that the Kingdom customer was not the person for whose use said passport was originally issued and designed.

In violation of Title 18, United States Code, Sections 1544, and 2.

**COUNT 10**  
**(Money Laundering Conspiracy)**

The Grand Jury further charges that:

31. Paragraphs 1 through 12 are incorporated by reference as if fully set forth herein.

32. As described above, Kingdom hosted cryptocurrency addresses for its users, both vendors and buyers, to carry out and otherwise facilitate illegal transactions. Kingdom also provided instructions for its users to use privacy coins, such as Monero, to obscure the historical trail of digital currency associated with the site and its users, some of whom were located in the Eastern District of Missouri. Further, as described above, Kingdom took a percentage on all illegal transactions occurring through its site as a commission, which went to administrators of the site, including the defendant. In addition, the defendant and his co-conspirators, moved their ill-gotten profits throughout the world, including to and from Slovakia and the United States.

33. Beginning in approximately June 2020 and continuing until December 14, 2023, in the Eastern District of Missouri, and elsewhere,

**ALAN BILL,  
a/k/a “Vend0r”  
a/k/a “KingdomOfficial”**

the defendant herein, did knowingly combine, conspire and agree with other persons, known and unknown to the Grand Jury, to commit the following offenses:

a. To knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which involved the proceeds of specified unlawful activities, that is, drug trafficking in violation of Title 21, United States Code, Section 841 and 846, and identity theft in violation of Title 18, United States Code, Section 1028, 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 Title 18, United States Code, Section 1956(a)(1)(B)(i).

b. To knowingly engage and attempt to engage in monetary transactions involving criminally derived property, through a financial institution, affecting interstate and foreign commerce, of a value greater than \$10,000, such property having been derived from specified unlawful activities, that is, drug trafficking in violation of Title 21, United States Code, Section 841 and 846, and identity theft in violation of Title 18, United States Code, Section 1028, in violation of Title 18, United States Code, Section 1957.

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

**FORFEITURE ALLEGATION**

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 21, United States Code, Sections 853(a), upon conviction of an offense in violation of Title 21, United States Code, Sections 841(a)(1) or 846, as set forth in Counts 1 through 5, the defendant shall forfeit to the United States of America any property, constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation(s) and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation(s). Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds obtained directly or indirectly as a result of such violation(s).

2. Pursuant to Title 18, United States Code, Sections 982(a)(2)(b) and 1028(b), upon conviction of an offense in violation of Title 18, United States Code, Section 1028 as set forth in Counts 6 through 8, the defendant shall forfeit to the United States of America any property constituting, or derived from, proceeds the defendant obtained, directly or indirectly, as a result of such violation and any personal property used or intended to be used to commit said offense. Subject to forfeiture is a sum of money equal to the total value of the property constituting, or derived from, proceeds the defendant obtained directly or indirectly, as a result of such violation.

3. Pursuant to Title 18, United States Code, Sections 982(a)(6), upon conviction of an offense in violation of Title 18, United States Code, Section 1028(f), as set forth in Count 6, or Title 18, United States Code, Section 1544, as set forth in Count 11, the defendant shall forfeit to the United States of America any property real or personal that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense, or that is used to facilitate, or is intended to be used to facilitate, the commission of the offense. Subject to forfeiture is a sum of money equal to the total value of any property real or personal

that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offenses set forth in Counts 6 and 11.

4. Pursuant to Title 18, United States Code, Sections 982(a), upon conviction of an offense in violation of Title 18, United States Code, Section 1956, as set forth in Count 12, the defendant shall forfeit to the United States of America any property, real or personal, involved in such offense, or any property traceable to such property. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, involved in such offense, or any property traceable to such property, for offenses charged in Count 12.

5. If any of the property described above, 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,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

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FOREPERSON

SAYLER A. FLEMING  
United States Attorney

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KYLE T. BATEMAN, #996646DC  
Assistant United States Attorney