

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

V.

Cr. No. 15-cr-12-01/02-SM

PANOS ELIOPOULOS, and
KATIE ELIOPOULOS
a/k/a Katie Aubre

INDICTMENT

The Grand Jury Charges:

COUNT ONE

[Conspiracy to Offer Drug Paraphernalia for Sale]
[21 U.S.C. §§ 846 and 863(a)(1)]

From a date uncertain but beginning on or about August 1, 2013 and continuing through late-April, 2014, in the District of New Hampshire the defendants,

PANOS ELIOPOULOS, and
KATIE ELIOPOULOS
a/k/a Katie Aubre

knowingly and intentionally combined, conspired and agreed with each other and with other persons known and unknown to the Grand Jury to offer for sale drug paraphernalia, to include among other items glass pipes, bongs and chillums in violation of Title 21, United States Code, Sections 846 and 863(a)(1).

The Grand Jury further charges:

COUNT TWO
[Conspiracy to Commit Money Laundering]
[18 U.S.C. §§ 1956(h) and 1956 (a)(1)(A)(i)]

From a date uncertain but beginning on or about August 1, 2013 and continuing through late-April, 2014, in the District of New Hampshire the defendants,

PANOS ELIOPOULOS, and
KATIE ELIOPOULOS
a/k/a Katie Aubre

knowingly, combined, conspired, and agreed with each other and 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 in that the defendants knowingly conducted or attempted to conduct financial transactions affecting interstate commerce, which involved the proceeds of a specified unlawful activity, that is conspiracy to offer for sale drug paraphernalia, to include among other items glass pipes, bongs and chillums in violation of Title 21, United States Code, Sections 846 and 863(a)(1), and that while conducting and attempting to conduct such financial transactions knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

All in violation of Title 18, United States Code, Sections 1956(h) and 1956 (a)(1)(A)(i).

NOTICE OF FORFEITURE

Upon conviction of the violations alleged in Count One of this Indictment, the defendants shall forfeit to the United States any property constituting, or derived from, proceeds obtained,

directly or indirectly, as a result of the charged offenses and any properties used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the charged offenses; and a sum of money equal to the amount of proceeds obtained as a result of the charged offenses, for which the defendants are jointly and severally liable.

Upon conviction of the violations alleged in Count Two of this Indictment, the defendants shall forfeit to the United States a sum of money equal to the property involved in the charged offenses, for which the defendants are jointly and severally liable.

Dated: February 11, 2015

A TRUE BILL.

/s/ Foreperson
FOREPERSON

JOHN P. KACAVAS
United States Attorney

Dated: February 11, 2015

/s/ Jennifer C. Davis
Jennifer C. Davis
Assistant U.S. Attorney