

FILED
U.S. DISTRICT COURT
DISTRICT OF NEW MEXICO

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

2012 MAY 16 PM 5:15

CLERK-LAS CRUCES

UNITED STATES OF AMERICA,)
)
Plaintiff,)

vs.)

SCOTT SPENCER WETHERHOLT,)
PATRICIA KRONBERGER,)
PATRICIA LOPEZ-RODRIGUEZ,)
ERNEST JOE MARQUEZ,)
VELINDA GALVAN,)
a/k/a Belinda Galvan,)
a/k/a Bel,)
WAYLAND DUANE LEETH,)
ERIK ARMANDO NAHLE,)
a/k/a Eric Armando Nahle,)
a/k/a Erick Nahle)
LETICIA RAMIREZ,)
JOSHUA LEE WHITLEY, and)
DAVID LAWRENCE GARZA,)

Defendants.)

CRIMINAL NO. 12-1167

Count 1: 21 U.S.C. § 846: Conspiracy

Counts 2, 9-11, 13-15: 21 U.S.C. § 843(b): Use
of a Communication Facility to Further the
Commission of a Drug Trafficking Crime; 18
U.S.C. § 2: Aiding and Abetting

Count 3: 21 U.S.C. §§ 841(a)(1) and (b)(1)(A):
Possession With Intent to Distribute 50 Grams
and More of Methamphetamine; 18 U.S.C. § 2:
Aiding and Abetting

Counts 4-6, 12: 18 U.S.C. §§ 922(g)(1) and
924(a)(2): Felon in Possession of a Firearm; 18
U.S.C. § 2: Aiding and Abetting

Counts 7, 8: 21 U.S.C. §§ 841(a)(1)
and (b)(1)(C): Distribution of
Methamphetamine; 18 U.S.C. § 2: Aiding and
Abetting

Count 16: 21 U.S.C. §§ 841(a)(1) and (b)(1)(B):
Possession With Intent to Distribute 50 Grams
and More of a Mixture and Substance
Containing Methamphetamine; 18 U.S.C. § 2:
Aiding and Abetting

INDICTMENT

The Grand Jury charges:

Count 1

From on or about January 9, 2012, and continuing to May 16, 2012, in Doña Ana County,
in the District of New Mexico and elsewhere, the defendants, **SCOTT SPENCER
WETHERHOLT, PATRICIA KRONBERGER, PATRICIA LOPEZ-RODRIGUEZ, ERNEST**

JOE MARQUEZ, VELINDA GALVAN, a/k/a Belinda Galvan, a/k/a Bel, WAYLAND DUANE LEETH, ERIK ARMANDO NAHLE, a/k/a Eric Armando Nahle, a/k/a Erick Nahle, LETICIA RAMIREZ, JOSHUA LEE WHITLEY, and DAVID LAWRENCE GARZA, unlawfully, knowingly and intentionally did combine, conspire, confederate and agree with each other and with other persons whose names are known and unknown to the Grand Jury to commit the following offenses against the United States, to wit: possession with intent to distribute a controlled substance, 50 grams and more of methamphetamine, contrary to 21 U.S.C. §§ 841(a)(1) and (b)(1)(A).

Overt Acts

In furtherance of the conspiracy, and to accomplish the objectives of the conspiracy, the following overt acts, among others, were committed:

Overt Act One

On January 10, 2012, **SCOTT SPENCER WETHERHOLT** and **PATRICIA KRONBERGER** provided 3.6 grams of pure methamphetamine to a cooperating source in Las Cruces, New Mexico.

Overt Act Two

On January 11, 2012, **SCOTT SPENCER WETHERHOLT** and **PATRICIA KRONBERGER** received \$400 from a cooperating source as payment for 3.6 grams of pure methamphetamine they had provided the previous day in Las Cruces, New Mexico.

Overt Act Three

On January 11, 2012, during a meeting with a cooperating source, **SCOTT SPENCER WETHERHOLT** and **PATRICIA KRONBERGER** explained the way they would conduct future methamphetamine sales and **SCOTT SPENCER WETHERHOLT** explained that drug dealing is the way he supports himself.

Overt Act Four

On January 12, 2012, **PATRICIA KRONBERGER** provided 5.8 grams of pure methamphetamine to a cooperating source in Las Cruces, New Mexico.

Overt Act Five

On January 17, 2012, **PATRICIA KRONBERGER** received \$400 from a cooperating source as payment for 5.8 grams of pure methamphetamine she had provided on January 12, 2012, in Las Cruces, New Mexico.

Overt Act Six

On January 17, 2012, **PATRICIA KRONBERGER** provided 5.5 grams of pure methamphetamine to a cooperating source in Las Cruces, New Mexico.

Overt Act Seven

On January 17, 2012, **PATRICIA KRONBERGER** received \$400 from a cooperating source as payment for 5.5 grams of pure methamphetamine she had provided on January 17, 2012, in Las Cruces, New Mexico.

Overt Act Eight

On February 13, 2012, **SCOTT SPENCER WETHERHOLT** and **WAYLAND DUANE LEETH** purchased approximately 453.6 grams of a mixture and substance containing a detectable amount of methamphetamine for \$12,000 from a man in Arizona.

Overt Act Nine

On February 14, 2012, **PATRICIA KRONBERGER** called **PATRICIA LOPEZ-RODRIGUEZ** to apologize for attempting to acquire methamphetamine from **PATRICIA LOPEZ-RODRIGUEZ**' associate and to try to ensure that **SCOTT SPENCER WETHERHOLT** and

PATRICIA KRONBERGER would be able to purchase methamphetamine from **PATRICIA LOPEZ-RODRIGUEZ** in the future.

Overt Act Ten

On February 16, 2012, **PATRICIA LOPEZ-RODRIGUEZ** received approximately \$5,900 in drug proceeds from **SCOTT SPENCER WETHERHOLT** and **PATRICIA KRONBERGER** in Las Cruces, New Mexico.

Overt Act Eleven

In a series of text messages on March 3, 2012, **PATRICIA KRONBERGER** and **PATRICIA LOPEZ-RODRIGUEZ** agreed that **PATRICIA KRONBERGER** and **SCOTT SPENCER WETHERHOLT** would travel to Arizona and purchase twelve ounces of methamphetamine for \$650 per ounce from **PATRICIA LOPEZ-RODRIGUEZ**.

Overt Act Twelve

In a telephone call on March 6, 2012, **ERNEST JOE MARQUEZ** offered to supply **SCOTT SPENCER WETHERHOLT** with narcotics to distribute and **SCOTT SPENCER WETHERHOLT** agreed to distribute those narcotics.

Overt Act Thirteen

On March 8, 2012, **SCOTT SPENCER WETHERHOLT**, **PATRICIA KRONBERGER**, and **WAYLAND DUANE LEETH** stored 289.6 grams of pure methamphetamine in a storage unit and it was discovered by law enforcement along with nine firearms.

Overt Act Fourteen

In a telephone call on March 10, 2012, **ERNEST JOE MARQUEZ** instructed **SCOTT SPENCER WETHERHOLT** to get a new telephone following the arrest of Wayland Duane Leeth and the seizure of methamphetamine and firearms that occurred on March 8, 2012.

Overt Act Fifteen

In a telephone call on March 10, 2012, **ERIK ARMANDO NAHLE, a/k/a Eric Armando Nahle, a/k/a Erick Nahle** and **SCOTT SPENCER WETHERHOLT** agreed to meet so that **ERIK ARMANDO NAHLE, a/k/a Eric Armando Nahle, a/k/a Erick Nahle** could provide the new telephone that **SCOTT SPENCER WETHERHOLT** wanted following the arrest of Wayland Duane Leeth on March 8, 2012.

Overt Act Sixteen

In a telephone call to **PATRICIA LOPEZ-RODRIGUEZ** on March 10, 2012, **PATRICIA KRONBERGER** explained that she and Scott Spencer Wetherholt lost twelve ounces (289.6 grams) of methamphetamine when law enforcement searched Wayland Duane Leeth's storage unit in Las Cruces, New Mexico.

Overt Act Seventeen

In a telephone call on March 15, 2012, **SCOTT SPENCER WETHERHOLT** agreed to deliver \$12,000 in drug proceeds that he owed to **ERNEST JOE MARQUEZ** in Las Cruces, New Mexico.

Overt Act Eighteen

In a telephone call on March 24, 2012, **WAYLAND DUANE LEETH** asked **SCOTT SPENCER WETHERHOLT** for one and a half grams of methamphetamine.

Overt Act Nineteen

On April 11, 2012, **LETICIA RAMIREZ** sold approximately 1 gram of a mixture and substance containing a detectable amount of methamphetamine to a cooperating source in Las Cruces, New Mexico.

Overt Act Twenty

On April 13, 2012, **LETICIA RAMIREZ** sold 1.8 grams of pure methamphetamine to a cooperating source for \$170 in Las Cruces, New Mexico.

Overt Act Twenty-One

On April 17, 2012, **LETICIA RAMIREZ** sold 4.6 grams of pure methamphetamine to a cooperating source for \$400 in Las Cruces, New Mexico.

Overt Act Twenty-Two

On April 18, 2012, **ERIK ARMANDO NAHLE, a/k/a Eric Armando Nahle, a/k/a Erick Nahle** and **SCOTT SPENCER WETHERHOLT** received approximately 85 grams of a mixture and substance containing a detectable amount of methamphetamine which they intended to distribute to other people in Las Cruces, New Mexico.

Overt Act Twenty-Three

In a call on April 18, 2012, **JOSHUA LEE WHITLEY** agreed to provide \$650 to **SCOTT SPENCER WETHERHOLT** in exchange for a half ounce (approximately 14 grams) of a mixture and substance containing a detectable amount of methamphetamine in Las Cruces, New Mexico.

Overt Act Twenty-Four

In a call on April 18, 2012, **LETICIA RAMIREZ** agreed to provide \$500 or \$600 to **SCOTT SPENCER WETHERHOLT** in exchange for a mixture and substance containing a detectable amount of methamphetamine in Las Cruces, New Mexico.

Overt Act Twenty-Five

In a call on April 18, 2012, **ERIK ARMANDO NAHLE, a/k/a Eric Armando Nahle, a/k/a Erick Nahle** and **SCOTT SPENCER WETHERHOLT** agreed to split three ounces (approximately 85 grams) of methamphetamine that they were in the process of obtaining from their source of supply in El Paso, Texas, so that they could further distribute it.

Overt Act Twenty-Six

In a text message on April 19, 2012, **SCOTT SPENCER WETHERHOLT** informed **ERNEST JOE MARQUEZ** that he had \$1,200 in drug proceeds to provide in payment for a drug debt.

Overt Act Twenty-Seven

In a call on April 23, 2012, **ERNEST JOE MARQUEZ** informed **SCOTT SPENCER WETHERHOLT** that he needed to pay his drug debt to **ERNEST JOE MARQUEZ**, who would in turn pay his drug debt to his source of supply in Arizona.

Overt Act Twenty-Eight

In a call on April 28, 2012, **ERNEST JOE MARQUEZ** and **SCOTT SPENCER WETHERHOLT** agreed to send \$3,000 to their source of supply in Arizona in order to receive approximately 453.6 grams of a mixture and substance containing a detectable amount of methamphetamine.

Overt Act Twenty-Nine

In a call on April 28, 2012, **DAVID LAWRENCE GARZA** agreed to "invest" \$1,000 so that **SCOTT SPENCER WETHERHOLT** and **ERNEST JOE MARQUEZ** could receive approximately 453.6 grams of a mixture and substance containing a detectable amount of methamphetamine from their source of supply in Arizona.

Overt Act Thirty

In a call on April 28, 2012, **ERNEST JOE MARQUEZ** and **VELINDA GALVAN, a/k/a Belinda Galvan, a/k/a Bel** discussed a search at the Border Patrol checkpoint on I-10 in New Mexico and agreed that **VELINDA GALVAN, a/k/a Belinda Galvan, a/k/a Bel** would continue traveling to Arizona in order to acquire methamphetamine.

Overt Act Thirty-One

On April 29, 2012, **VELINDA GALVAN, a/k/a Belinda Galvan, a/k/a Bel** brought approximately 453.6 grams of a mixture and substance containing a detectable amount of methamphetamine from Arizona to **ERNEST JOE MARQUEZ** in Las Cruces, New Mexico, and they intended to distribute it to other people.

In violation of 21 U.S.C. § 846.

Count 2

On or about March 3, 2012, in Doña Ana County, in the District of New Mexico, the defendants, **PATRICIA KRONBERGER** and **PATRICIA LOPEZ-RODRIGUEZ**, unlawfully, knowingly and intentionally did use a communication facility, to wit: a telephone, to further the commission of a drug trafficking crime, to wit: conspiracy to possess with intent to distribute a controlled substance, a mixture and substance containing a detectable amount of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b), and 18 U.S.C. § 2.

Count 3

On or about March 8, 2012, in Doña Ana County, in the District of New Mexico, the defendants, **SCOTT SPENCER WETHERHOLT, PATRICIA KRONBERGER,** and

WAYLAND DUANE LEETH, unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, 50 grams and more of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 18 U.S.C. § 2.

Count 4

On or about March 8, 2012, in Doña Ana County, in the District of New Mexico, the defendant, **WAYLAND DUANE LEETH**, a person who previously had been convicted of felony crimes punishable by imprisonment for a term exceeding one year, to wit: four counts of Forgery (Issue or Transfer) and one count of Conspiracy to Commit Forgery (Issue or Transfer), Case No. D-307-CR-200600748, in the Third Judicial District, Doña Ana County, State of New Mexico, and Forgery (Make or Alter) and Conspiracy to Commit Forgery (Make or Alter), Case No. D-307-CR-2006001013, in the Third Judicial District, Doña Ana County, State of New Mexico, did knowingly possess, in and affecting commerce, firearms, to wit: a Marlin, Glenfield Model 60, .22 caliber rifle bearing serial number 19287612; an Intratec, Model Tec 9, 9 millimeter pistol bearing serial number 02623; a Maverick, Model 88, 20 gauge shotgun bearing serial number MV34886P; a Ranger, unknown model, 410 gauge shotgun bearing no serial number; a Remington, Model 700, 7 millimeter rifle bearing serial number S6228764; a Stevens, Model 87A, .22 caliber rifle bearing no serial number; and a Charles Daley, Model Superior, 12 gauge shotgun bearing serial number S352978.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2), and 18 U.S.C. § 2.

Count 5

On or about March 8, 2012, in Doña Ana County, in the District of New Mexico, the defendant, **SCOTT SPENCER WETHERHOLT**, a person who previously had been convicted of felony crimes punishable by imprisonment for a term exceeding one year, to wit: Larceny (Over

\$250) and Conspiracy to Commit Larceny (Over \$250), Case No. D-307-CR-200600517, in the Third Judicial District, Doña Ana County, State of New Mexico; did knowingly possess, in and affecting commerce, firearms, to wit: a Glock, Model 21, .45 caliber pistol bearing serial number BEL851US; and a Walter, Model P22, .22 caliber pistol bearing serial number L321950.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2), and 18 U.S.C. § 2.

Count 6

On or about March 20, 2012, in Doña Ana County, in the District of New Mexico, the defendant, **SCOTT SPENCER WETHERHOLT**, a person who previously had been convicted of felony crimes punishable by imprisonment for a term exceeding one year, to wit: Larceny (Over \$250) and Conspiracy to Commit Larceny (Over \$250), Case No. D-307-CR-200600517, in the Third Judicial District, Doña Ana County, State of New Mexico; did knowingly possess, in and affecting commerce, firearms, to wit: a Ruger, Model Mark II Target, .22 caliber pistol bearing serial number 218-99972; and a Keltec, Model P11, 9 millimeter pistol bearing serial number 121419.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2), and 18 U.S.C. § 2.

Count 7

On or about April 13, 2012, in Doña Ana County, in the District of New Mexico, the defendant, **LETICIA RAMIREZ**, unlawfully, knowingly and intentionally distributed a controlled substance, methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), and 18 U.S.C. § 2.

Count 8

On or about April 17, 2012, in Doña Ana County, in the District of New Mexico, the defendant, **LETICIA RAMIREZ**, unlawfully, knowingly and intentionally distributed a controlled substance, methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), and 18 U.S.C. § 2.

Count 9

On or about April 18, 2012, in Doña Ana County, in the District of New Mexico, the defendants, **SCOTT SPENCER WETHERHOLT** and **JOSHUA LEE WHITLEY**, unlawfully, knowingly and intentionally did use a communication facility, to wit: a telephone, to further the commission of a drug trafficking crime, to wit: conspiracy to possess with intent to distribute a controlled substance, a mixture and substance containing a detectable amount of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b), and 18 U.S.C. § 2.

Count 10

On or about April 18, 2012, in Doña Ana County, in the District of New Mexico, the defendants, **SCOTT SPENCER WETHERHOLT** and **LETICIA RAMIREZ**, unlawfully, knowingly and intentionally did use a communication facility, to wit: a telephone, to further the commission of a drug trafficking crime, to wit: conspiracy to possess with intent to distribute a controlled substance, a mixture and substance containing a detectable amount of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b), and 18 U.S.C. § 2.

Count 11

On or about April 18, 2012, in Doña Ana County, in the District of New Mexico, the defendants, **SCOTT SPENCER WETHERHOLT** and **ERIK ARMANDO NAHLE, a/k/a Eric Armando Nahle, a/k/a Erick Nahle**, unlawfully, knowingly and intentionally did use a communication facility, to wit: a telephone, to further the commission of a drug trafficking crime,

to wit: conspiracy to possess with intent to distribute a controlled substance, a mixture and substance containing a detectable amount of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b), and 18 U.S.C. § 2.

Count 12

On or about April 20, 2012, in Doña Ana County, in the District of New Mexico, the defendant, **SCOTT SPENCER WETHERHOLT**, a person who previously had been convicted of felony crimes punishable by imprisonment for a term exceeding one year, to wit: Larceny (Over \$250) and Conspiracy to Commit Larceny (Over \$250), Case No. D-307-CR-200600517, in the Third Judicial District, Doña Ana County, State of New Mexico, did knowingly possess, in and affecting commerce, a firearm, to wit: a Ruger, Model Super Redhawk, .44 caliber pistol bearing serial number 550-53901.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2), and 18 U.S.C. § 2.

Count 13

On or about April 28, 2012, in Doña Ana County, in the District of New Mexico, the defendants, **SCOTT SPENCER WETHERHOLT** and **ERNEST JOE MARQUEZ**, unlawfully, knowingly and intentionally did use a communication facility, to wit: a telephone, to further the commission of a drug trafficking crime, to wit: conspiracy to possess with intent to distribute a controlled substance, a mixture and substance containing a detectable amount of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b), and 18 U.S.C. § 2.

Count 14

On or about April 28, 2012, in Doña Ana County, in the District of New Mexico, the defendants, **SCOTT SPENCER WETHERHOLT** and **DAVID LAWRENCE GARZA**,

unlawfully, knowingly and intentionally did use a communication facility, to wit: a telephone, to further the commission of a drug trafficking crime, to wit: conspiracy to possess with intent to distribute a controlled substance, a mixture and substance containing a detectable amount of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b), and 18 U.S.C. § 2.

Count 15

On or about April 28, 2012, in Doña Ana County, in the District of New Mexico, the defendants, **ERNEST JOE MARQUEZ** and **VELINDA GALVAN, a/k/a Belinda Galvan, a/k/a Bel**, unlawfully, knowingly and intentionally did use a communication facility, to wit: a telephone, to further the commission of a drug trafficking crime, to wit: conspiracy to possess with intent to distribute a controlled substance, a mixture and substance containing a detectable amount of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b), and 18 U.S.C. § 2.

Count 16

On or about April 29, 2012, in Doña Ana County, in the District of New Mexico, the defendants, **ERNEST MARQUEZ** and **VELINDA GALVAN, a/k/a Belinda Galvan, a/k/a Bel**, unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, 50 grams and more of a mixture and substance containing a detectable amount of methamphetamine.

In violation of 21 U.S.C. § § 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

FORFEITURE ALLEGATION

Counts 1 through 16 of this Indictment are incorporated as part of this section of the indictment as if fully re-alleged herein for the purpose of alleging forfeiture to the United States pursuant to 21 U.S.C. § 853, 18 U.S.C. § 924(d)(1), and 28 U.S.C. § 2461(c).

Upon conviction of any offense in violation of 21 U.S.C. §§ 841, 843, or 846, the defendants, **SCOTT SPENCER WETHERHOLT, PATRICIA KRONBERGER, PATRICIA LOPEZ-RODRIGUEZ, ERNEST JOE MARQUEZ, VELINDA GALVAN, a/k/a Belinda Galvan, a/k/a Bel, WAYLAND DUANE LEETH, ERIK ARMANDO NAHLE, a/k/a Eric Armando Nahle, a/k/a Erick Nahle, LETICIA RAMIREZ, JOSHUA LEE WHITLEY, and DAVID LAWRENCE GARZA**, shall forfeit to the United States pursuant to 21 U.S.C. § 853 any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of each offense for which the Defendants are convicted, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said offenses.

The property to be forfeited to the United States includes but is not limited to the following:

MONEY JUDGMENT

A sum of money equal to at least \$44,820 in U.S. currency, including any interest accruing to the date of the judgment, representing the amount of money derived from or involved in the offenses, or traceable to property involved in the offenses, for which the Defendants are jointly and severally liable.

FIREARMS

Upon conviction of any offense in violation of 18 U.S.C. § 922(g)(1) set forth in Counts 4, 5, 6, and 13 of this Indictment, the defendants, **SCOTT SPENCER WETHERHOLT** and **WAYLAND DUANE LEETH**, shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved or used in the knowing commission of the offenses, including, but not limited to:

- a. Marlin, Glenfield model 60, .22 caliber rifle bearing serial number 19287612;
- b. Intratec, model ec 9, 9 millimeter pistol bearing serial number 02623;
- c. Maverick, model 88, 20 gauge shotgun bearing serial number MV34886P;

- d. Ranger, unknown model, 410 gauge shotgun bearing no serial number;
- e. Remington, model 700, 7 millimeter rifle bearing serial number S6228764;
- f. Stevens, model 87A, .22 caliber rifle bearing no serial number;
- g. Charles Daley, model Superior, 12 gauge shotgun bearing serial number S352978;
- h. Glock, model 21, .45 caliber pistol bearing serial number BEL851US;
- i. Walter, model P22, .22 caliber pistol bearing serial number L321950;
- j. Ruger, model Mark II Target, .22 caliber pistol bearing serial number 218-99972;
- k. Keltec, model P11, 9 millimeter pistol bearing serial number 121419; and
- l. Ruger, model Super Redhawk, .44 caliber revolver bearing serial 550-53901

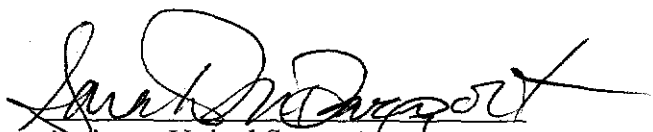
SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of the defendants:

- 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, it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), 18 U.S.C. § 982(b) and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the Defendants up to the value of the forfeitable property described above.

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY


Assistant United States Attorney

Rew 05/15/12 2:08pm