

JOHN W. HUBER, United States Attorney (#7226)  
VERNON STEJSKAL, Assistant United States Attorney (#8434)  
MICHAEL GADD, Special Assistant United States Attorney (#13704)  
Attorneys for the United States of America  
111 South Main Street, Suite 1800  
Salt Lake City, Utah 84111  
Telephone: (801) 524-5682  
Email: Michael.Gadd@usdoj.gov

FILED  
U.S. DISTRICT COURT  
2017 MAY 31 P 2:49  
DISTRICT OF UTAH  
BY: \_\_\_\_\_  
DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

AARON MICHAEL SHAMO,  
DREW WILSON CRANDALL,  
ALEXANDRYA MARIE TONGE,  
KATHERINE LAUREN ANNE BUSTIN,  
MARIO ANTHONY NOBLE, and  
SEAN MICHAEL GYGI,  
Defendants.

**SUPERSEDING INDICTMENT**

Case No. 2:16-cr-00631-DAK

**VIOLATIONS:**

21 U.S.C. §848, CONTINUING  
CRIMINAL ENTERPRISE;

21 U.S.C. §846, CONSPIRACY TO  
DISTRIBUTE A CONTROLLED  
SUBSTANCE;

21 U.S.C. §952, AIDING AND  
ABETTING THE IMPORTATION OF A  
CONTROLLED SUBSTANCE;

21 U.S.C. §841(a)(1), POSSESSION OF  
FENTANYL WITH INTENT TO  
DISTRIBUTE;

21 U.S.C. §841(a)(1), MANUFACTURE  
OF ALPRAZOLAM;

21 U.S.C. §§ 331(k) & 333(b)(7),  
KNOWING AND INTENTIONAL  
ADULTERATION OF DRUGS WHILE  
HELD FOR SALE;

21 U.S.C. §843(b), USE OF THE U.S.  
MAIL IN FURTHERANCE OF A DRUG  
TRAFFICKING OFFENSE;

18 U.S.C. §1956(h), CONSPIRACY TO

COMMIT MONEY LAUNDERING; 18 U.S.C. § 1957(a), ENGAGING IN MONETARY TRANSACTIONS IN PROPERTY DERIVED FROM SPECIFIED UNLAWFUL ACTIVITY; 18 U.S.C. § 1956(a)(1)(A)(i), MONEY LAUNDERING CONCEALMENT; Judge Dale. A Kimball
--

The Grand Jury Charges:

**COUNT 1**

(21 U.S.C. § 848, CONTINUING CRIMINAL ENTERPRISE)

Beginning on a date unknown to the Grand Jury, but at least by July 8, 2015, and continuing to at least November 22, 2016, in the Central Division of the District of Utah and elsewhere,

AARON MICHAEL SHAMO,

defendant herein, did knowingly and intentionally engage in a continuing criminal enterprise in that he knowingly and intentionally violated Title 21, United States Code, Sections 841(a)(1), 846, and 952(a), which violations include, but are not limited to,

- The violation alleged in Count 2, Conspiracy to Distribute Fentanyl, which Count is re-alleged and incorporated herein by reference as though fully set forth in this Count;
- The violation alleged in Count 3, Conspiracy to Distribute Alprazolam, which Count is re-alleged and incorporated herein by reference as though fully set forth in this Count;

- The violation alleged in Count 4, Aiding and Abetting the Importation of a Controlled Substance, which Count is re-alleged and incorporated herein by reference as though fully set forth in this Count;
- The violation alleged in Count 5, Aiding and Abetting the Importation of a Controlled Substance, which Count is re-alleged and incorporated herein by reference as though fully set forth in this Count;
- The violation alleged in Count 6, Aiding and Abetting the Importation of a Controlled Substance, which Count is re-alleged and incorporated herein by reference as though fully set forth in this Count;
- The violation alleged in Count 7, Possession of Fentanyl with Intent to Distribute, which Count is re-alleged and incorporated herein by reference as though fully set forth in this Count;
- Aiding and abetting the violation alleged in Count 8, Possession of Fentanyl with Intent to Distribute, which Count is re-alleged and incorporated herein by reference as though fully set forth in this Count;
- The violation alleged in Count 9, Manufacture of Alprazolam, which Count is re-alleged and incorporated herein by reference as though fully set forth in this Count;
- The violation alleged in Count 12, Use of the U.S. Mail in Furtherance of a Drug Trafficking Offense, which Count is re-alleged and incorporated herein by reference as though fully set forth in this Count;

- Aiding and Abetting the Attempted Distribution of Fentanyl on or about November 20, 2016, to J.G., aka “trustworthymoney,” through A.L., all in violation of Title 21, United States Code, Sections 841(a)(1) and 846, and Title 18, United States Code, Section 2;
- Aiding and Abetting the Possession of Fentanyl with Intent to Distribute on the following dates to the following addressees, each in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2:

<b>Date</b>	<b>Addressee</b>	<b>State</b>	<b>Number of Pills</b>	<b>Controlled Substance</b>	<b>Markings</b>
11/18/2016	N.A.	CA	12	Fentanyl	A 215
11/18/2016	M.J.	CA	11	Fentanyl	M/30
11/18/2016	A.B.	CO	20	Fentanyl	M/30
11/18/2016	B.B.	CO	10	Fentanyl	A 215
11/18/2016	T.M.	CT	60	Fentanyl	M/30
11/18/2016	J.R.	CT	11	Fentanyl	A 215
11/20/2016	T.J.	FL	200	Fentanyl	A 215
11/18/2016	P.F.	IL	100	Fentanyl	A 215
11/18/2016	J.M.	IL	22	Fentanyl	M/30
11/18/2016	A.G.	KY	20	Fentanyl	A 215
11/18/2016	F.O.	LA	100	Fentanyl	M/30
11/20/2016	C.D.	MA	100	Fentanyl	A 215
11/18/2016	J.M.	MD	27	Fentanyl	A 215
11/20/2016	N.M.	ME	100	Fentanyl	A 215

11/20/2016	N.Y.	MI	100	Fentanyl	A 215
11/18/2016	M.P.	MN	16	Fentanyl	A 215
11/18/2016	A.B.	MO	11	Fentanyl	M/30
11/18/2016	A.M.	MT	40	Fentanyl	M/30
11/18/2016	D.G.	MT	40	Fentanyl	A 215
11/18/2016	M.S.	NC	100	Fentanyl	A 215
11/18/2016	M.L.	NC	100	Fentanyl	A 215
11/20/2016	J.R.	NC	100	Fentanyl	A 215
11/18/2016	L.P.	NY	11	Fentanyl	M/30
11/18/2016	J.G.	NY	11	Fentanyl	M/30
11/18/2016	B.S.	OH	11	Fentanyl	A 215
11/18/2016	R.B.	OH	150	Fentanyl	A 215
11/18/2016	K.M. T T S T R	OK	11	Fentanyl	M/30
11/18/2016	C.	PA	11	Fentanyl	M/30
11/18/2016	R.P.	PA	11	Fentanyl	A 215
11/18/2016	J.S.	PA	11	Fentanyl	A 215
11/18/2016	S.F.	PA	11	Fentanyl	A 215
11/20/2016	A.H.	PA	100	Fentanyl	A 215
11/18/2016	K.M.	SC	11	Fentanyl	M/30
11/18/2016	T.E.	SC	12	Fentanyl	M/30
11/18/2016	G.T.	TX	11	Fentanyl	M/30
11/20/2016	A.W.	TX	13	Fentanyl	M/30
11/20/2016	J.B.	TX	100	Fentanyl	M/30

11/18/2016	A.T.	VA	12	Fentanyl	M/30
11/20/2016	G.D.	VA	150	Fentanyl	A 215
11/20/2016	A.H.	VA	100	Fentanyl	A 215

- Aiding and Abetting the Possession of Alprazolam with Intent to Distribute on the following dates to the following addressees, each in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2:

Date	Addressee	State	Number of Pills	Controlled Substance	Markings
11/20/2016	A.L.	CA	100	Alprazolam	GG 249
11/18/2016	A.F.	GA	200	Alprazolam	GG 249
11/20/2016	S.S.	GA	100	Alprazolam	GG 249
11/20/2016	P.O.	GA	100	Alprazolam	GG 249
11/18/2016	D.C.	IL	100	Alprazolam	GG 249
11/20/2016	D.C.	IL	100	Alprazolam	GG 249
11/20/2016	J.H.	LA	100	Alprazolam	GG 249
11/20/2016	J.S.	MI	200	Alprazolam	GG 249
11/20/2016	C.G.	MS	100	Alprazolam	GG 249
11/18/2016	S.W.	NC	100	Alprazolam	GG 249
11/18/2016	R.K.	NC	100	Alprazolam	GG 249
11/18/2016	F.W.	NC	100	Alprazolam	GG 249
11/20/2016	Z.W.	NY	100	Alprazolam	GG 249
11/18/2016	X.C.	OH	100	Alprazolam	GG 249
11/18/2016	P.H.	PA	100	Alprazolam	GG 249

11/20/2016	N.H.	SC	100	Alprazolam	GG 249
11/20/2016	D.L.	SC	100	Alprazolam	GG 249
11/18/2016	R.T.	TN	100	Alprazolam	GG 249
11/20/2016	C.S.	TN	100	Alprazolam	GG 249
11/18/2016	A.S.	TX	100	Alprazolam	GG 249

- Aiding and Abetting the Use of the U.S. Mail in Furtherance of a Drug Trafficking Offense on the following dates to the following addressees, each in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2:

<b>Date</b>	<b>Addressee</b>	<b>State</b>	<b>Number of Pills</b>	<b>Controlled Substance</b>	<b>Markings</b>
11/22/2016	T.G.	NC	50	Fentanyl	M/30
11/22/2016	E.S.	NC	100	Fentanyl	A 215
11/22/2016	E.J.	NC	100	Fentanyl	M/30
11/22/2016	B.F.	ND	500	Fentanyl	M/30
11/22/2016	D.P.	NY	100	Fentanyl	M/30
11/22/2016	R.W.	SC	50	Fentanyl	M/30
11/22/2016	M.E.	SD	500	Fentanyl	A 215
11/22/2016	G.V.	VA	100	Fentanyl	M/30

- Aiding and Abetting the Distribution of Fentanyl on or about April 27, 2016, to D.M., all in violation of Title 21, United States Code, Section 841(a)(1) and Title

18, United States Code, Section 2;

- Aiding and Abetting the Distribution of Fentanyl on or about June 14, 2016, to D.M., all in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2; and
- Aiding and Abetting the Distribution of Fentanyl on or about June 12, 2016, to J.A., all in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2;

which violations were part of a continuing series of violations of the Controlled Substances Act, Title 21, United States Code, Section 801, *et seq.*, undertaken by defendant, AARON MICHAEL SHAMO, in concert with at least five other persons with respect to whom AARON MICHAEL SHAMO occupied a position of organizer, supervisor, and any position of management, and from which such continuing series of violations the defendant obtained substantial income and resources.

Furthermore, the defendant, AARON MICHAEL SHAMO, was a principal administrator, organizer, supervisor and leader of the criminal enterprise, which involved possession with intent to distribute and distribution of more than 12,000 grams of a mixture and substance containing a detectable amount of Fentanyl (N-phenyl-N-[ 1- ( 2-phenylethyl ) -4-piperidinyl ] propanamide), a schedule II controlled substance within the meaning of 21 U.S.C. § 812; all in violation of 21 U.S.C. § 848(b)(1) and (2)(A) and punishable under 21 U.S.C. § 848(b).



**COUNT 2**

(21 U.S.C. §§ 846 & 841(a)(1), CONSPIRACY TO DISTRIBUTE FENTANYL)

Beginning on a date unknown to the Grand Jury, but at least by February 3, 2016, and continuing to at least November 22, 2016, in the Central Division of the District of Utah and elsewhere,

DREW WILSON CRANDALL,  
ALEXANDRYA MARIE TONGE,  
KATHERINE LAUREN ANNE BUSTIN,  
MARIO ANTHONY NOBLE, and  
SEAN MICHAEL GYGI,

defendants herein, did combine, conspire, confederate and agree with AARON MICHAEL SHAMO, with each other, and with other persons, both known and unknown to the Grand Jury, to knowingly and intentionally distribute four hundred grams or more of a mixture or substance containing a detectable amount of Fentanyl (N-phenyl-N- [ 1-(2-phenylethyl) -4-piperidinyl ] propanamide), a Schedule II controlled substance within the meaning of 21 U.S.C. § 812, all in violation of 21 U.S.C. §§ 846 and 841(a)(1) and punishable under 21 U.S.C. § 841(b)(1)(A).

**COUNT 3**

(21 U.S.C. §§ 846 & 841(a)(1), CONSPIRACY TO DISTRIBUTE ALPRAZOLAM)

Beginning on a date unknown to the Grand Jury, but at least by December 22, 2015, and continuing to at least November 22, 2016, in the Central Division of the District of Utah and elsewhere,

DREW WILSON CRANDALL,  
ALEXANDRYA MARIE TONGE,  
KATHERINE LAUREN ANNE BUSTIN,  
MARIO ANTHONY NOBLE, and

SEAN MICHAEL GYGI,

defendants herein, did combine, conspire, confederate and agree with AARON MICHAEL SHAMO, with each other, and with other persons, both known and unknown to the Grand Jury, to knowingly and intentionally distribute a mixture or substance containing a detectable amount of Alprazolam, a Schedule IV controlled substance within the meaning of 21 U.S.C. § 812, all in violation of 21 U.S.C. §§ 846 and 841(a)(1) and punishable under 21 U.S.C. § 841(b)(2).

**COUNT 4**

(21 U.S.C. §952, AIDING AND ABETTING THE IMPORTATION OF A CONTROLLED SUBSTANCE)

On or about June 23, 2016, in the Central Division of the District of Utah and elsewhere,

AARON MICHAEL SHAMO,

defendant herein, did intentionally and knowingly import from the country of China into the United States 40 grams or more of a mixture and substance containing a detectable amount of Fentanyl (N-phenyl-N- [ 1- ( 2-phenylethyl ) -4-piperidiny] propanamide), a Schedule II controlled substance within the meaning of 21 U.S.C. § 812, and did aid and abet therein, all in violation of 21 U.S.C. §§ 952(a), 960, and 18 U.S.C. § 2, and punishable under 21 U.S.C. § 960(b)(2).

**COUNT 5**

(21 U.S.C. §952, AIDING AND ABETTING THE IMPORTATION OF A CONTROLLED SUBSTANCE)

On or about November 8, 2016, in the Central Division of the District of Utah and elsewhere,

AARON MICHAEL SHAMO,

defendant herein, did intentionally and knowingly import from the country of China into the United States a mixture and substance containing a detectable amount of Alprazolam, a Schedule IV controlled substance within the meaning of 21 U.S.C. § 812; and did aid and abet therein, all in violation of 21 U.S.C. §§ 952(a), 960, and 18 U.S.C. § 2, and punishable under 21 U.S.C. § 960(b)(2).

**COUNT 6**

(21 U.S.C. §952, AIDING AND ABETTING THE IMPORTATION OF A CONTROLLED SUBSTANCE)

On or about November 17, 2016, in the Central Division of the District of Utah and elsewhere,

AARON MICHAEL SHAMO, and  
SEAN MICHAEL GYGI,

defendants herein, did intentionally and knowingly import from the country of China into the United States 40 grams or more of a mixture and substance containing a detectable amount of Fentanyl (N-phenyl-N- [ 1- ( 2-phenylethyl ) -4-piperidiny] propanamide), a Schedule II controlled substance within the meaning of 21 U.S.C. § 812, and did aid and abet therein, all in violation of 21 U.S.C. §§ 952(a), 960, and 18 U.S.C. § 2, and punishable under 21 U.S.C. § 960(b)(2).

**COUNT 7**

(21 U.S.C. § 841(a)(1), POSSESSION OF FENTANYL WITH INTENT TO  
DISTRIBUTE)

On or about November 22, 2016, in the Central Division of the District of Utah,

AARON MICHAEL SHAMO,

the defendant herein, did knowingly and intentionally possess with intent to distribute four hundred grams or more of a mixture or substance containing a detectable amount of Fentanyl (N-phenyl-N- [ 1- ( 2-phenylethyl ) -4-piperidinyl ] propanamide), a Schedule II controlled substance within the meaning of 21 U.S.C. § 812; all in violation of 21 U.S.C. § 841(a)(1) and punishable pursuant to 21 U.S.C. § 841(b)(1)(A).

**COUNT 8**

(21 U.S.C. § 841(a)(1), POSSESSION OF FENTANYL WITH INTENT TO  
DISTRIBUTE)

On or about November 22, 2016, in the Central Division of the District of Utah,

ALEXANDRYA MARIE TONGE, and  
KATHERINE LAUREN ANNE BUSTIN,

defendants herein, did knowingly and intentionally possess with intent to distribute four hundred grams or more of a mixture or substance containing a detectable amount of Fentanyl (N-phenyl-N- [ 1- ( 2-phenylethyl ) -4-piperidinyl ] propanamide), a Schedule II controlled substance within the meaning of 21 U.S.C. § 812; all in violation of 21 U.S.C. § 841(a)(1) and punishable pursuant to 21 U.S.C. § 841(b)(1)(A).

**COUNT 9**

(21 U.S.C. § 841(a)(1), MANUFACTURE OF ALPRAZOLAM)

On or about November 22, 2016, in the Central Division of the District of Utah,

AARON MICHAEL SHAMO,

the defendant herein, did knowingly and intentionally manufacture a mixture or substance containing a detectable amount of Alprazolam, a Schedule IV controlled substance within the meaning of 21 U.S.C. § 812; all in violation of 21 U.S.C. § 841(a)(1) and punishable pursuant to 21 U.S.C. § 841(b)(2).

**COUNT 10**

(21 U.S.C. §§ 331(k) & 333(b)(7), KNOWING AND INTENTIONAL  
ADULTERATION OF DRUGS WHILE HELD FOR SALE

Beginning on a date unknown to the Grand Jury, but at least by February 3, 2016, and continuing to at least November 22, 2016, in the Central Division of the District of Utah,

AARON MICHAEL SHAMO,

defendant herein, knowingly and intentionally manufactured a drug and caused the manufacture of a drug—specifically, round blue tablets debossed with “A 215” on the bisected side—and offered those tablets for sale on the internet as “Oxycodone 30 mg.” Despite these representations, the defendant did not use Oxycodone at all in the manufacturing process, but instead, substituted Fentanyl, a much more potent synthetic opioid. These acts caused the drug to be adulterated as defined at 21 U.S.C. §§ 351(b) and 351(d), and the adulteration had a reasonable probability of causing serious adverse health consequences or death to humans. The manufacturing of these drugs was

performed after the component ingredients of the tablets had been shipped in interstate commerce, from outside of Utah to Utah, and while the drugs were held for sale. All this was in violation of 21 U.S.C. §§ 331(k) and 333(b)(7) and is punishable pursuant to 21 U.S.C. § 333(b)(7).

**COUNT 11**

(21 U.S.C. §§ 331(k) & 333(b)(7), KNOWING AND INTENTIONAL  
ADULTERATION OF DRUGS WHILE HELD FOR SALE)

Beginning on a date unknown to the Grand Jury, but at least by June 18, 2016, and continuing to at least November 22, 2016, in the Central Division of the District of Utah,

AARON MICHAEL SHAMO,

defendant herein, knowingly and intentionally manufactured a drug and caused the manufacture of a drug—specifically, round blue tablets with “M” on one side and a “30” above a bisect on the other—and offered those tablets for sale on the internet as “Oxycodone 30 mg.” Despite these representations, the defendant did not use Oxycodone at all in the manufacturing process, but instead, substituted Fentanyl, a much more potent synthetic opioid. These acts caused the drug to be adulterated as defined at 21 U.S.C. §§ 351(b) and 351(d), and the adulteration had a reasonable probability of causing serious adverse health consequences or death to humans. The manufacturing of these drugs was performed after the component ingredients of the tablets had been shipped in interstate commerce, from outside of Utah to Utah, and while the drugs were held for sale. All this was in violation of 21 U.S.C. §§ 331(k) and 333(b)(7) and is punishable pursuant to 21 U.S.C. § 333(b)(7).

**COUNT 12**

(21 U.S.C. § 843(b), USE OF THE U.S. MAIL IN FURTHERANCE OF A DRUG TRAFFICKING OFFENSE)

On or about September 12-23, 2016, in the Central Division of the District of Utah,

AARON MICHAEL SHAMO,  
ALEXANDRYA MARIE TONGE,  
KATHERINE LAUREN ANNE BUSTIN, and  
SEAN MICHAEL GYGI,

the defendants herein, did knowingly and intentionally use a communication facility, the U.S. Mail, in facilitating the commission of any act constituting a felony under Title 21, United States Code, Section 841(a)(1), that is, distribution of a controlled substance; and did aid and abet therein, all in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 843(b). Specifically, a package containing Alprazolam tablets and which listed a false return address was sent through the U.S. Mail, but was returned by the postal service to the false return address in the date range listed above. T.M., who resided at the address listed on the false return address, received the package of Alprazolam tablets.

**COUNT 13**

(18 U.S.C. § 1956(h), CONSPIRACY TO COMMIT MONEY LAUNDERING)

Beginning on a date unknown to the Grand Jury, but at least by December 22, 2015, and continuing to at least November 22, 2016, in the Central Division of the District of Utah and elsewhere,

AARON MICHAEL SHAMO,  
DREW WILSON CRANDALL,  
ALEXANDRYA MARIE TONGE, and

KATHERINE LAUREN ANNE BUSTIN,

defendants herein, did knowingly combine, conspire, confederate and agree with each other and with other persons, both known and unknown to the Grand Jury, to knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, wire transfers, bank deposits, electronic funds transfers, automated clearing house payments, and the interstate movement of cash, which involved the proceeds of a specified unlawful activity, that is, the distribution of a controlled substance in violation of 21 U.S.C. § 841(a)(1), with the intent to promote, conceal, and disguise the carrying on of specified unlawful activity, that is, distribution of a controlled substance, and that while conducting and attempting to conduct such 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(a)(1)(A)(i) and (a)(1)(B)(i); all in violation of 18 U.S.C. §1956(h).

**COUNT 14**

(18 U.S.C. § 1956(a)(1)(B)(i), MONEY LAUNDERING CONCEALMENT)

On or about November 8, 2016, in the Central Division of the District of Utah,

AARON MICHAEL SHAMO,

defendant herein, did knowingly conduct and attempt to conduct a financial transaction affecting interstate commerce, to wit a bank deposit, which involved the proceeds of a specified unlawful activity, that is the distribution of a controlled substance, with the intent to conceal the nature, source, location, ownership, and control of the proceeds of the specified unlawful activity, to wit: distribution of a controlled substance in violation



of 21 U.S.C. § 841(a)(1); and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity; all in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

**COUNT 15**

(18 U.S.C. § 1957(a), ENGAGING IN MONETARY TRANSACTIONS IN PROPERTY DERIVED FROM SPECIFIED UNLAWFUL ACTIVITY)

On or about May 5, 2016, in the Central Division of the District of Utah,

AARON MICHAEL SHAMO,

defendant herein, did knowingly engage and attempt to engage in a monetary transaction by, through, or to a financial institution, affecting interstate commerce, in criminally derived property of a value greater than \$10,000, that is, issue a personal check, such property having been derived from a specified unlawful activity, that is, distribution of a controlled substance in violation of 21 U.S.C. § 841(a)(1); all in violation of Title 18, United States Codes, Sections 1957(a).

**NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE**

Pursuant to 21 U.S.C. § 853, upon conviction of any offense in violation of 21 U.S.C. §§ 841, 846, 848, and/or 952, as set forth in this indictment, 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 offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the

commission of, the offenses. The property to be forfeited includes, but is not limited to, the following:

**CURRENCY**

- \$1,227,773.00 in United States Currency
- \$19,520.00 in United States Currency
- \$429,600.00 in United States Currency

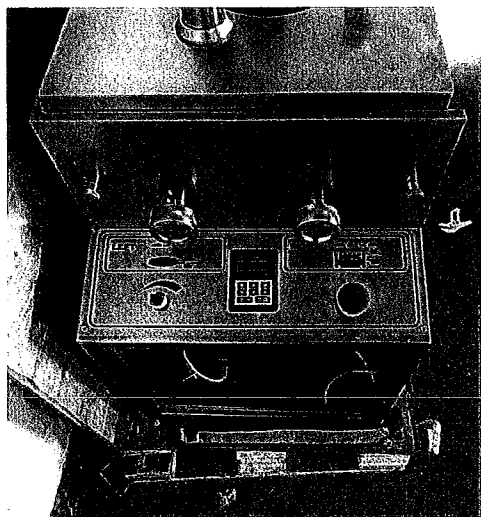
**AUTOMOBILES**

- A 2011 Ford F-350 pickup, VIN#1FT8W3BT7BEC88017
- A 2008 BMW 135i, VIN#WBAUC73508VF25535

**MISCELLANEOUS**

- The pill press seized from the garage at Aaron SHAMO's residence on Titian Way.

Here is a photo:



- The following dies/punches:

Item	Punch Embossing	Comparison Tablet(s) Available	Comparison Tablet(s) Items
Item 20 A1	GG 2 4 9 (w/ $\frac{3}{4}$ cores)	YES	14, 15, 16, 17, 18, 19
Item 20 A2	GG 2 4 9 (w/ $\frac{3}{4}$ cores)	YES	14, 15, 16, 17, 18, 19
Item 20 A3	(Slug – not a tablet punch)	NO	NOT APPLICABLE
Item 20 B1	2 (w/ $\frac{3}{4}$ cores)	NO	NOT AVAILABLE
Item 20 B2	2 (w/ $\frac{3}{4}$ cores)	NO	NOT AVAILABLE
Item 20 B3	2 (w/ $\frac{3}{4}$ cores)	NO	NOT AVAILABLE
Item 20 B4	2 (w/ $\frac{3}{4}$ cores)	NO	NOT AVAILABLE
Item 20 B5	X A N A X (w/ $\frac{3}{4}$ cores)	NO	NOT AVAILABLE
Item 20 B6	X A N A X (w/ $\frac{3}{4}$ cores)	NO	NOT AVAILABLE
Item 20 B7	X A N A X (w/ $\frac{3}{4}$ cores)	NO	NOT AVAILABLE
Item 20 B8	X A N A X (w/ $\frac{3}{4}$ cores)	NO	NOT AVAILABLE
Item 20 B9	10/325	NO	NOT AVAILABLE
Item 20 B10	X A N A X (w/ $\frac{3}{4}$ cores)	NO	NOT AVAILABLE
Item 20 B11	2 (w/ $\frac{3}{4}$ cores)	NO	NOT AVAILABLE
Item 20 B12	M523	NO	NOT AVAILABLE
Item 20 B13	M523	NO	NOT AVAILABLE
Item 20 B14	M523	NO	NOT AVAILABLE
Item 20 B15	M523	NO	NOT AVAILABLE
Item 20	M523	NO	NOT AVAILABLE

B16			
Item 20 B17	10/325	NO	NOT AVAILABLE
Item 20 B18	10/325	NO	NOT AVAILABLE
Item 20 B19	10/325	NO	NOT AVAILABLE
Item 20 B20	10/325	NO	NOT AVAILABLE
Item 20 B21	R 0 3 9 (w/ 3/4 cores)	NO	NOT AVAILABLE
Item 20	10 metal die with oval shaped through holes	No Analyses Performed	No Analyses Performed
Item 21 A1	M (enclosed in a square)	YES	6, 8, 9, 10, 12, 13
Item 21 A2	M (enclosed in a square)	YES	6, 8, 9, 10, 12, 13
Item 21 A3	M (enclosed in a square)	YES	6, 8, 9, 10, 12, 13
Item 21 A4	M (enclosed in a square)	YES	6, 8, 9, 10, 12, 13
Item 21 A5	M (enclosed in a square)	YES	6, 8, 9, 10, 12, 13
Item 21 A6	M (enclosed in a square)	YES	6, 8, 9, 10, 12, 13
Item 21 A7	M (enclosed in a square)	YES	6, 8, 9, 10, 12, 13
Item 21 A8	M (enclosed in a square)	YES	6, 8, 9, 10, 12, 13
Item 21 A9	M (enclosed in a square)	YES	6, 8, 9, 10, 12, 13
Item 22 A1	GG 2 4 9 (w/ 3/4 cores)	YES	14, 15, 16, 17, 18, 19
Item 22 A2	GG 2 4 9 (w/ 3/4 cores)	YES	14, 15, 16, 17, 18, 19
Item 22 A3	GG 2 4 9 (w/ 3/4 cores)	YES	14, 15, 16, 17, 18, 19
Item 22	GG 2 4 9 (w/ 3/4	YES	14, 15, 16, 17, 18,

A4	cores)		19
Item 22 A5	GG 2 4 9 (w/ 3/4 cores)	YES	14, 15, 16, 17, 18, 19
Item 22 A6	GG 2 4 9 (w/ 3/4 cores)	YES	14, 15, 16, 17, 18, 19
Item 22 A7	GG 2 4 9 (w/ 3/4 cores)	YES	14, 15, 16, 17, 18, 19
Item 22 A8	GG 2 4 9 (w/ 3/4 cores)	YES	14, 15, 16, 17, 18, 19

### MONEY JUDGMENT

- A MONEY JUDGMENT equal to the value of any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses.

Pursuant to 18 U.S.C. § 982(a)(1), upon conviction of any offense in violation of 18 U.S.C. §§ 1956 and/or 1957, the defendants shall forfeit to the United States of America any property, real or personal, involved in such violations, and any property traceable to such property. The property to be forfeited includes, but is not limited to the following:

- A MONEY JUDGMENT equal to the value of all property involved in the money laundering and any property traceable to such property.

If more than one defendant is convicted of an offense, the defendants so convicted shall be jointly and severally liable for the forfeiture related to such offense.

**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

has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

A TRUE BILL:

\_\_\_\_\_  
15/  
FOREPERSON OF GRAND JURY

JOHN W. HUBER  
United States Attorney

\_\_\_\_\_  
MICHAEL GADD,  
Special Assistant United States Attorney  
VERNON STEJSKAL,  
Assistant United States Attorney