

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Criminal Case No. 18-cr-00381-GPG

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. BRUCE HOLDER

Defendant.

FILED
UNITED STATES DISTRICT COURT
DENVER, COLORADO
1:52 pm, Aug 16, 2018
JEFFREY P. COLWELL, CLERK

INDICTMENT

The Grand Jury charges:

COUNT 1

On or about December 26, 2017, within the State and District of Colorado, the defendant, BRUCE HOLDER, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, the use of which resulted in the death of J.E. on or about December 28, 2017; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 2

On or about December 26, 2017, within the State and District of Colorado, the defendant, BRUCE HOLDER, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, the use of which resulted in serious bodily injury to Z.G. on or about December 28, 2017; in violation of Title 21,

United States Code, Sections 841(a)(1) and (b)(1)(C).

FORFEITURE ALLEGATION

1. The allegations contained in Counts 1 and 2 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853.

2. Upon conviction of the violations alleged in Counts 1 and 2 of this Indictment involving violations of Title 21, United States Code, Sections 841(a)(1), defendant, BRUCE HOLDER, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853 any and all of the defendant's right, title, and interest in all property constituting and derived from any proceeds obtained directly and indirectly as a result of such offense, and in all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offense, including, but not limited to a money judgment in the amount of proceeds obtained by the defendant.

3. 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 subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property.

A TRUE BILL

Ink signature on file in Clerk's Office
FOREPERSON

ROBERT C. TROYER
United States Attorney

s/ *Jeremy Chaffin*
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