

Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington.

September 13 2018
WILLIAM M. McCOOL, Clerk
By Emily Nero Deputy

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

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11 UNITED STATES OF AMERICA,)
12 Plaintiff,)
13 v.)
14)
15 BRADLEY WOOLARD, and)
16 GRIFFIN THOMPSON,)
17 Defendants.)
18

CASE NO. **CR18-217 RSM**
INDICTMENT

19
20 The Grand Jury charges that:

21 **COUNT 1**

22 **(Conspiracy to Distribute Controlled Substances)**

23 Beginning at a time unknown, but within the past five years, and continuing until
24 on or about September 1, 2018, in Whatcom and Snohomish Counties, within the
25 Western District of Washington, and elsewhere, BRADLEY WOOLARD, GRIFFIN
26 THOMPSON, and others known and unknown, did knowingly and intentionally conspire
27 to distribute substances controlled under Title 21, United States Code, Section 812,
28 including furanyl fentanyl, (N-(1-phenethylpiperidin-4-yl)-N-phenylfuran-2-

1 carboxamide) contrary to the provisions of Title 21, United States Code, Sections
2 841(a)(1) and 846.

3 **Specific Quantity Allegations as to Furanyl Fentanyl**

4 With respect to Defendants BRADLEY WOOLARD and GRIFFIN THOMPSON,
5 their conduct as members of the conspiracy charged in Count 1, which includes the
6 reasonably foreseeable conduct of other members of the conspiracy charged in Count 1,
7 involved 100 grams or more of a mixture or substance containing a detectable amount of
8 furanyl fentanyl, (N-(1-phenethylpiperidin-4-yl)-N-phenylfuran-2-carboxamide), an
9 analogue of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), in
10 violation of Title 21, United States Code, Section 841(b)(1)(A).

11 All in violation of Title 21, United States Code, Section 841(a)(1) and 846.

12 **COUNT 2**

13 **(Possession of Furanyl Fentanyl with Intent to Distribute)**

14 On or about July 27, 2018, at Arlington, in Snohomish County, within the Western
15 District of Washington, and elsewhere, GRIFFIN THOMPSON and BRADLEY
16 WOOLARD, did knowingly and intentionally possess, and aided and abetted the
17 possession of, with the intent to distribute, furanyl fentanyl, (N-(1-phenethylpiperidin-4-
18 yl)-N-phenylfuran-2-carboxamide), a substance controlled under Title 21, United States
19 Code, Section 812, Schedule I.

20 It is further alleged that the offense involved one hundred (100) grams or more of
21 a mixture or substance containing a detectable amount of furanyl fentanyl, (N-(1-
22 phenethylpiperidin-4-yl)-N-phenylfuran-2-carboxamide) an analogue of fentanyl (N-
23 phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide).

24 The Grand Jury further alleges that this offense was committed during and in
25 furtherance of the conspiracy charged in Count 1, above.

26 All in violation of Title 21, United States Code, Sections 841(a)(1) and
27 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT 3

(Possession of Furanyl Fentanyl with Intent to Distribute)

On or about July 28, 2018, at Arlington, in Snohomish County, within the Western District of Washington, and elsewhere, BRADLEY WOOLARD did knowingly and intentionally possess, and aided and abetted the possession of, with the intent to distribute, furanyl fentanyl, (N-(1-phenethylpiperidin-4-yl)-N-phenylfuran-2-carboxamide), a substance controlled under Title 21, United States Code, Section 812, Schedule I.

It is further alleged that the offense involved one hundred (100) grams or more of a mixture or substance containing a detectable amount of furanyl fentanyl, (N-(1-phenethylpiperidin-4-yl)-N-phenylfuran-2-carboxamide) an analogue of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide).

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

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

COUNT 4

(Felon in Possession of Firearms)

Beginning on a date unknown but at least by July 27, 2018, and continuing through on or about August 19, 2018, at Arlington, in Snohomish County, within the Western District of Washington, and elsewhere, BRADLEY WOOLARD, having previously been convicted of crimes punishable by imprisonment for a term exceeding one year, to wit: *Use of a Building for Unlawful Drugs*, on or about September 24, 2004, in Island County Superior Court, Case No. 04-1-00050-6; did knowingly possess in and affecting interstate and foreign commerce firearms, that is:

- 1) One Bushmaster Gwimm Arm model 5.56 pistol, bearing serial no. 000928;
- 2) One H&R Topper model 12 gauge shotgun, bearing serial no. BA596467;
- 3) One Savage 311 model 12 gauge shotgun with no serial number,

- 1 4) One Romarm WASR-10, 2.62mm caliber AK-style rifle, bearing serial
2 no. A1-15735-13;
- 3 5) One CAI PAP M85PV, 5.56x45mm caliber AK-style pistol, bearing serial
4 no. M85PV001076;
- 5 6) One Sig Sauer Mosquito, .22 caliber pistol, bearing serial no. A045138;
- 6 7) One Ruger Archangel, 5.56 caliber rifle with Nikon scope, bearing serial
7 no. 239-36328;
- 8 8) One Springfield Socom 11, .308 caliber rifle, bearing serial no. 211153;
- 9 9) One Smith & Wesson, M&P15, 5.56 caliber rifle, bearing serial no.
10 36659;
- 11 10) One Century Arms M70 ABZ, 7.62 caliber A-K style rifle, bearing serial
12 no. AB205476;
- 13 11) One Winchester 270, .22 caliber rifle, bearing serial no. B1414990;
- 14 12) One Bushmaster XM15-E2S, .223/5.56 caliber rifle, bearing serial no.
15 BFIT006816;
- 16 13) One Mossberg 500, 12-gauge shotgun, bearing serial no. 4612209;
- 17 14) One Mossberg 930, 12-gauge shotgun, bearing serial no. AF058922;
- 18 15) One Mossberg 500A, 12-gauge pistol-grip shotgun, bearing serial no.
19 P343300;
- 20 16) One Kel-Tec KSG, 12-gauge shotgun;
- 21 17) One Ruger SR40c, .40 S&W caliber handgun, bearing serial no. 343-
22 86164;
- 23 18) One Taurus .410/.45/.454 revolver bearing serial no. 7734513;
- 24 19) One Sturm, Ruger & Co., .22 caliber pistol, bearing serial no. 267080;
- 25 20) One Ruger MK2 .22 pistol;
- 26 21) One Sturm, Ruger & Co., .22 caliber pistol, bearing serial no. 103780;
- 27 22) One Taurus PT24-7 Pro, .45 pistol, bearing serial no. NZA73541;
- 28 23) One Walther PPK/S, .22 caliber pistol, bearing serial no. WF004724;
- 24) One Sig Sauer 1911, .45 caliber pistol, bearing serial no. 54A007330;

- 1 25) One H&R 926, .38 caliber revolver, bearing serial no. AG12256;
- 2 26) One Cobra pistol, bearing serial no. 89-0035941;
- 3 27) One Springfield XD, .9mm pistol, bearing serial no. US14414;
- 4 28) One D-Technik A.S., SA VZ.61 Czech Republic, TGI Knoxville, TN,
- 5 7.65 caliber pistol, bearing serial no. P7385P;
- 6 29) One Winchester speed-pump, 12-gauge shotgun, bearing serial no.
- 7 L3576609;
- 8 30) One rifle with Chinese markings, bearing serial no. 104219G8FW;
- 9 31) One Remington Sportsman 18, 12-gauge shotgun, bearing serial no.
- 10 3085607;
- 11 32) One Ruger 10/22 carbine, .22 caliber rifle with scope, bearing serial no.
- 12 29021078; and
- 13 33) One rifle, model unknown, with scope, bearing serial no. 5218,

14 which had been shipped and transported in interstate and foreign commerce.

15 The Grand Jury further alleges that this offense was committed during and in
16 furtherance of the conspiracy charged in Count 1, above.

17 All in violation of Title 18, United States Code, Section 922(g)(1).

18 **COUNT 5**

19 **(Possession of Firearms in Furtherance of a Drug Trafficking Offense)**

20 Beginning on a date unknown but at least by July 27, 2018, and continuing
21 through on or about August 19, 2018, at Arlington, in Snohomish County, within the
22 Western District of Washington, and elsewhere, BRADLEY WOOLARD knowingly and
23 intentionally possessed the following firearms, to wit:

- 24 1) One Bushmaster Gwimm Arm model 5.56 pistol, bearing serial no.
25 000928;
- 26 2) One H&R Topper model 12 gauge shotgun, bearing serial no. BA596467;
- 27 3) One Savage 311 model 12 gauge shotgun with no serial number,
- 28 4) One Romarm WASR-10, 2.62mm caliber AK-style rifle, bearing serial
no. A1-15735-13;

- 1 5) One CAI PAP M85PV, 5.56x45mm caliber AK-style pistol, bearing serial
2 no. M85PV001076;
- 3 6) One Sig Sauer Mosquito, .22 caliber pistol, bearing serial no. A045138;
- 4 7) One Ruger Archangel, 5.56 caliber rifle with Nikon scope, bearing serial
5 no. 239-36328;
- 6 8) One Springfield Socom 11, .308 caliber rifle, bearing serial no. 211153;
- 7 9) One Smith & Wesson, M&P15, 5.56 caliber rifle, bearing serial no.
8 36659;
- 9 10) One Century Arms M70 ABZ, 7.62 caliber A-K style rifle, bearing serial
10 no. AB205476;
- 11 11) One Winchester 270, .22 caliber rifle, bearing serial no. B1414990;
- 12 12) One Bushmaster XM15-E2S, .223/5.56 caliber rifle, bearing serial no.
13 BFIT006816;
- 14 13) One Mossberg 500, 12-gauge shotgun, bearing serial no. 4612209;
- 15 14) One Mossberg 930, 12-gauge shotgun, bearing serial no. AF058922;
- 16 15) One Mossberg 500A, 12-gauge pistol-grip shotgun, bearing serial no.
17 P343300;
- 18 16) One Kel-Tec KSG, 12-gauge shotgun;
- 19 17) One Ruger SR40c, .40 S&W caliber handgun, bearing serial no. 343-
20 86164;
- 21 18) One Taurus .410/.45/.454 revolver bearing serial no. 7734513;
- 22 19) One Sturm, Ruger & Co., .22 caliber pistol, bearing serial no. 267080;
- 23 20) One Ruger MK2 .22 pistol;
- 24 21) One Sturm, Ruger & Co., .22 caliber pistol, bearing serial no. 103780;
- 25 22) One Taurus PT24-7 Pro, .45 pistol, bearing serial no. NZA73541;
- 26 23) One Walther PPK/S, .22 caliber pistol, bearing serial no. WF004724;
- 27 24) One Sig Sauer 1911, .45 caliber pistol, bearing serial no. 54A007330;
- 28 25) One H&R 926, .38 caliber revolver, bearing serial no. AG12256;

- 1 26) One Cobra pistol, bearing serial no. 89-0035941;
- 2 27) One Springfield XD, .9mm pistol, bearing serial no. US14414;
- 3 28) One D-Technik A.S., SA VZ.61 Czech Republic, TGI Knoxville, TN,
- 4 7.65 caliber pistol, bearing serial no. P7385P;
- 5 29) One Winchester speed-pump, 12-gauge shotgun, bearing serial no.
- 6 L3576609;
- 7 30) One rifle with Chinese markings, bearing serial no. 104219G8FW;
- 8 31) One Remington Sportsman 18, 12-gauge shotgun, bearing serial no.
- 9 3085607;
- 10 32) One Ruger 10/22 carbine, .22 caliber rifle with scope, bearing serial no.
- 11 29021078; and
- 12 33) One rifle, model unknown, with scope, bearing serial no. 5218,

13 in furtherance of a drug trafficking offense for which he may be prosecuted in a Court of
14 the United States, to wit: *Conspiracy to Distribute Controlled Substances* as charged in
15 Count 1, above.

16 The Grand Jury further alleges that this offense was committed during and in
17 furtherance of the conspiracy charged in Count 1, above.

18 All in violation of Title 18, United States Code, Section 924(c)(1)(A).

19 **ALLEGATIONS OF FORFEITURE**

20 **Counts 1-3**

21 The allegations contained in Counts 1-3 of this Indictment are hereby realleged
22 and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21,
23 United States Code, Section 853(a).

24 Upon conviction of any the offenses alleged in Counts 1-3 of this Indictment, the
25 defendants, BRADLEY WOOLARD and GRIFFIN THOMPSON, shall forfeit to the
26 United States any property constituting, or derived from, any proceeds the defendant
27 obtained, directly or indirectly, as the result of such offense, and also shall forfeit any of
28 the defendant's property used, or intended to be used, in any manner or part, to commit,

1 or to facilitate the commission of, the offense, including but not limited to a judgment for
2 a sum of money representing the property described in this paragraph.

3 **924(d) Forfeitures**

4 The allegations contained in Counts 4-5 of this Indictment are hereby realleged
5 and incorporated herein by reference for the purpose of alleging forfeiture to the United
6 States pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United
7 States Code, Section 2461(c).

8 Upon conviction of any the offenses alleged in Counts 4-5 of this Indictment, the
9 defendant, BRADLEY WOOLARD, shall forfeit to the United States any firearms and
10 ammunition involved in or used in any knowing violation of Title 18, United States Code,
11 Sections 922(g) or 924, including but not limited to the firearms described above in
12 Count(s) 4-5, and all associated ammunition, seized during the referenced period, in
13 Arlington, Washington.

14 **Substitute Property**

15 If any of the above-described forfeitable property, as a result of any act or
16 omission of the defendants,

- 17 a. cannot be located upon the exercise of due diligence;
18 b. has been transferred or sold to, or deposited with, a third party;
19 c. has been placed beyond the jurisdiction of the Court;
20 d. has been substantially diminished in value; or
21 e. has been commingled with other property which cannot be divided without
22 difficulty;

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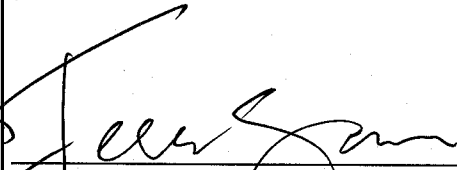
1 it is the intent of the United States, pursuant to Title 18, United States Code, Section
2 924(d)(1), Title 21, United States Code, Section 853(p) and Title 28, United States Code,
3 Section 2461(c), to seek the forfeiture of any other property of the defendants, up to the
4 value of the above-described forfeitable property.

5
6 A TRUE BILL:


7 DATED: 13 September 2018

8 Signature redacted per policy

9
10 _____
11 FOREPERSON

12 
13 ANNETTE L. HAYES
14 United States Attorney

15 
16 JAMES OESTERLE
17 Assistant United States Attorney

18 
19 KARYN JOHNSON
20 Assistant United States Attorney

21 
22 S. KATE VAUGHAN
23 Assistant United States Attorney

DEFENDANT STATUS SHEET

(One for each defendant)

I. CASE STATUS

Name of Defendant: Bradley Woolard

Has defendant had initial appearance in this case? Yes No

MJ 18-406

CR

II. CUSTODIAL STATUS

If defendant had initial appearance, please check one of the following:

Continue Conditions of Release

Continue Detention

Temporary Detention, a detention hearing has been scheduled for

III. ARRAIGNMENT

Warrant to Issue (If so, please complete *Defendant Arrest Warrant Info Sheet*)

Summons to be Issued for Appearance on

Defendant's Address:

Letter to Defense Counsel for Appearance on

Defense Attorney's Name and address: TBD

The estimated trial time is 7 days.

DEFENDANT STATUS SHEET

(One for each defendant)

I. CASE STATUS

Name of Defendant: Griffin Thompson

Has defendant had initial appearance in this case? Yes No

MJ

CR

II. CUSTODIAL STATUS

If defendant had initial appearance, please check one of the following:

- Continue Conditions of Release
- Continue Detention
- Temporary Detention, a detention hearing has been scheduled for

III. ARRAIGNMENT

Warrant to Issue (If so, please complete *Defendant Arrest Warrant Info Sheet*)

Summons to be Issued for Appearance on

Defendant's Address:

Letter to Defense Counsel for Appearance on

Defense Attorney's Name and address: TBD

The estimated trial time is 7 days.