AO 257 (Rev. 6/78)

| Name of District Court, and/or Judge/Magistrate Location NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION DEFENDANT - U.S DAVID BECKFORD DISTRICT COURT NUMBER CR 16-00013 JSW DEFENDANT IS NOT IN CUSTODY Has not been arrested, pending outcome this proceeding. If not detained give date any prior summons was served on above charges 2) Is a Fugitive 3) Is on Bail or Release from (show District) |
|--|
| DAVID BECKFORD DISTRICT COURT NUMBER CR 16-00013 JSW DEFENDANT IS NOT IN CUSTODY Has not been arrested, pending outcome this proceeding. 1) If not detained give date any prior summons was served on above charges 2) Is a Fugitive |
| DAVID BECKFORD DISTRICT COURT NUMBER CR 16-00013 JSW DEFENDANT IS NOT IN CUSTODY Has not been arrested, pending outcome this proceeding. 1) If not detained give date any prior summons was served on above charges 2) Is a Fugitive |
| DAVID BECKFORD DISTRICT COURT NUMBER CR 16-00013 JSW DEFENDANT IS NOT IN CUSTODY Has not been arrested, pending outcome this proceeding. 1) If not detained give date any prior summons was served on above charges 2) Is a Fugitive |
| DEFENDANT IS NOT IN CUSTODY Has not been arrested, pending outcome this proceeding. 1) If not detained give date any prior summons was served on above charges 2) Is a Fugitive |
| DISTRICT COURT NUMBER CR 16-00013 JSW DEFENDANT IS NOT IN CUSTODY Has not been arrested, pending outcome this proceeding. 1) If not detained give date any prior summons was served on above charges 2) Is a Fugitive |
| DISTRICT COURT NUMBER CR 16-00013 JSW DEFENDANT IS NOT IN CUSTODY Has not been arrested, pending outcome this proceeding. 1) If not detained give date any prior summons was served on above charges 2) Is a Fugitive |
| DEFENDANT IS NOT IN CUSTODY Has not been arrested, pending outcome this proceeding. 1) If not detained give date any prior summons was served on above charges 2) Is a Fugitive |
| CR 16-00013 JSW DEFENDANT IS NOT IN CUSTODY Has not been arrested, pending outcome this proceeding. 1) If not detained give date any prior summons was served on above charges 2) Is a Fugitive |
| DEFENDANT IS NOT IN CUSTODY Has not been arrested, pending outcome this proceeding. 1) If not detained give date any prior summons was served on above charges 2) Is a Fugitive |
| IS NOT IN CUSTODY Has not been arrested, pending outcome this proceeding. 1) If not detained give date any prior summons was served on above charges 2) Is a Fugitive |
| IS NOT IN CUSTODY Has not been arrested, pending outcome this proceeding. 1) If not detained give date any prior summons was served on above charges 2) Is a Fugitive |
| Has not been arrested, pending outcome this proceeding. If not detained give date any prior summons was served on above charges 2) Is a Fugitive |
| summons was served on above charges 2) Is a Fugitive |
| 2) Is a Fugitive |
| |
| 3) Is on Bail or Release from (show District) |
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| o, io on content teneded name (content process) |
| |
| IS IN CUSTODY |
| 4) 🔀 On this charge |
| |
| 5) On another conviction |
| 6) Awaiting trial on other charges |
| If answer to (6) is "Yes", show name of institution |
| - |
| Has detainer Yes If "Yes" give date |
| been filed? No filed |
| DATE OF Month/Day/Year |
| ARREST 7 |
| Or if Arresting Agency & Warrant were not |
| DATE TRANSFERRED Month/Day/Year TO U.S. CUSTODY |
| |
| ☐ This report amends AO 257 previously submitted |
| |
| TION OR COMMENTS — |
| mount: |
| |
| e defendant previously apprehended on complaint, no new summons or |
| needed, since Magistrate has scheduled arraignment |
| ime: Before Judge: |
| |

Attachment to Penalty Sheet Superseding Indictment United States v. David Beckford

Offenses Charged and Maximum Penalties (Unless Otherwise Specified)

Count One

21 U.S.C. § 846 - Conspiracy to Manufacture, Distribute, and Possess with

Intent to Distribute a Controlled Substance

5 years of imprisonment

\$250,000 fine

Lifetime supervised release, with a minimum 1 year of supervised release

\$100 mandatory special assessment

Count Three

21 U.S.C. § 841(a)(1) - Manufacture, Distribution, and Possession of a

Schedule IV Controlled Substance with Intent to Distribute

5 years of imprisonment

\$250,000 fine

Lifetime supervised release, with a minimum 1 year of supervised release

\$100 mandatory special assessment

Count Four

21 U.S.C. § 841(a)(1) - Manufacture, Distribution, and Possession of a

Schedule II Controlled Substance with Intent to Distribute

20 years of imprisonment

\$1,000,000 fine

Lifetime supervised release, with a mandatory minimum of three years of

supervised release

\$100 mandatory special assessment

Count Five

18 U.S.C. § 922(g) - Felon in Possession of a Firearm and Ammunition

10 years of imprisonment

\$250,000 fine

3 years of supervised release

\$100 mandatory special assessment

Count Six

18 U.S.C. § 924(c) - Possession of a Firearm in Furtherance of a Drug

Trafficking Crime

Mandatory 5 years of imprisonment in addition to penalties for Count Four

Count Seven

21 U.S.C. § 841(a)(1) - Manufacture, Distribution, and Possession of a

Schedule IV Controlled Substance with Intent to Distribute

5 years of imprisonment

\$250,000 fine

Lifetime supervised release with a minimum 1 year of supervised release

\$100 mandatory special assessment

Count Eight

21 U.S.C. § 333(i)(3) – Sale of Counterfeit Drugs

3 years of imprisonment

\$10,000 fine

1 year of supervised release

\$100 mandatory special assessment

Count Nine

18 U.S.C. § 1956(h) - Conspiracy to Commit International Money

Laundering

20 years of imprisonment

\$500,000 fine or twice the value of the property involved in the transaction

3 years of supervised release

\$100 mandatory special assessment

Counts Ten through Thirty-Two 18 U.S.C. § 1956(a)(2)(A) – International Money Laundering

20 years of imprisonment

\$500,000 fine or twice the value of the property involved in the transaction

3 years of supervised release

\$100 mandatory special assessment per count

Count Thirty-Three

18 U.S.C. § 2320(a)(4) - Trafficking in a Counterfeit Drug

10 years of imprisonment

\$2,000,000 fine

3 years of supervised release

AO 257 (Rev. 6/78)

| DEFENDANT INFORMATION RELATIVE | TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT |
|--|--|
| BY: COMPLAINT INFORMATION INDICTMENT | NT Name of District Court, and/or Judge/Magistrate Location |
| OFFENSE CHARGED SUPERSE | NORTHERN DISTRICT OF CALIFORNIA |
| | OAKLAND DIVISION |
| See dituelled | inor DEFENDANT - U.S |
| | isde- |
| ☐ m | eanor STEPHAN FLORIDA |
| PENALTY: See attached | DISTRICT COURT NUMBER THE SAME TO SAME |
| PENALTY. See attached | CR 16-00013 JSW |
| | DEFENDANT |
| PROCEEDING | IS NOT IN CUSTODY |
| Name of Complaintant Agency, or Person (& Title, if any) | Has not been arrested, pending outcome this proceeding. 1) If not detained give date any prior |
| DEA Special Agent, Andrew Decker | summons was served on above charges |
| person is awaiting trial in another Federal or State Court, give name of court | 2) Is a Fugitive |
| — give hame of count | 3) Is on Bail or Release from (show District) |
| this person/proceeding is transferred from another distric | |
| per (circle one) FRCrp 20, 21, or 40. Show District | IS IN CUSTODY |
| 1 | — 4) ☑ On this charge |
| this is a reprosecution of | ', K |
| charges previously dismissed which were dismissed on motion SHOW | , J. |
| of: DOCKET | NO. 6) Awaiting trial on other charges |
| U.S. ATTORNEY DEFENSE | If answer to (6) is "Yes", show name of institution |
| this prosecution relates to a | Has detainer Yes If "Yes" |
| pending case involving this same defendant MAGISTR | Has detainer Line give date |
| CASE N | |
| prior proceedings or appearance(s) before U.S. Magistrate regarding this | ARREST |
| defendant were recorded under | Or if Arresting Agency & Warrant were not |
| Name and Office of Person Furnishing Information on this form BRIAN J. STRETCH | DATE TRANSFERRED Month/Day/Year TO U.S. CUSTODY |
| ☑ U.S. Attorney ☐ Other U.S. Age | ncy |
| Name of Assistant U.S. | This report amends AO 257 previously submitted |
| Attorney (if assigned) Sheila A.G. Armbrust | INCORRATION OF CORRESENTS |
| PROCESS: ADDITIONAL | INFORMATION OR COMMENTS ———————————————————————————————————— |
| ☐ SUMMONS ☑ NO PROCESS* ☐ WARRANT | Bail Amount: |
| If Summons, complete following: Arraignment Initial Appearance | * Where defendant previously apprehended on complaint, no new summons or |
| Defendant Address: | warrant needed, since Magistrate has scheduled arraignment |
| | Date/Time: Before Judge: |
| Comments: | |

Attachment to Penalty Sheet Superseding Indictment United States v. Stephan Florida

Offenses Charged and Maximum Penalties (Unless Otherwise Specified)

Count One

21 U.S.C. § 846 - Conspiracy to Manufacture, Distribute, and Possess with

Intent to Distribute a Schedule IV Controlled Substance

5 years of imprisonment

\$250,000 fine

Lifetime supervised release, with a minimum 1 year of supervised release

\$100 mandatory special assessment

Count Two

21 U.S.C. § 841(a)(1) – Manufacture, Distribution, and Possession of a

Schedule IV Controlled Substance with Intent to Distribute

5 years of imprisonment

\$250,000 fine

Lifetime supervised release, with a minimum 1 year of supervised release

\$100 mandatory special assessment

Count Seven

21 U.S.C. § 841(a)(1) - Manufacture, Distribution, and Possession of a

Schedule IV Controlled Substance with Intent to Distribute

5 years of imprisonment

\$250,000 fine

Lifetime supervised release, with a minimum 1 year of supervised release

\$100 mandatory special assessment

Count Eight

21 U.S.C. § 333(i)(3) – Sale of Counterfeit Drugs

3 years of imprisonment

\$10,000 fine

1 year of supervised release

AO 257 (Rev. 6/78);

| DEFENDANT INFORMATION RELATIVE TO | A CRIMINAL ACTION - IN U.S. DISTRICT COURT |
|--|---|
| BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT | Name of District Court, and/or Judge/Magistrate Location |
| OFFENSE CHARGED SUPERSEDING | NORTHERN DISTRICT OF CALIFORNIA |
| See attached Petty | OAKLAND DIVISION |
| Minor | C DEFENDANT - U.S |
| Misde- | |
| □ meano | BEAU SANKENE MAY |
| | DISTRICT COURT NUMBER COSUSA 22016 |
| PENALTY: See attached | CR 16-00013 JSW |
| | OAKLAND CALIFORN |
| | DEFENDANT |
| PROCEEDING | IS NOT IN CUSTODY |
| Name of Complaintant Agency, or Person (& Title, if any) | Has not been arrested, pending outcome this proceeding. 1) If not detained give date any prior |
| DEA Special Agent, Andrew Decker | summons was served on above charges |
| person is awaiting trial in another Federal or State Court, | 2) Is a Fugitive |
| ☐ give name of court | 2) [] Is an Beil of Bologo from (chau) District) |
| - | 3) Is on Bail or Release from (show District) |
| this person/proceeding is transferred from another district | |
| per (circle one) FRCrp 20, 21, or 40. Show District | IS IN CUSTODY |
| | 4) On this charge |
| this is a reprosecution of charges previously dismissed | 5) On another conviction |
| which were dismissed on motion SHOW | Federal State |
| of: U.S. ATTORNEY DEFENSE | 6) Awaiting trial on other charges |
| G.S. ATTOMET | If answer to (6) is "Yes", show name of institution |
| this prosecution relates to a | Has detainer Yes If "Yes" |
| pending case involving this same defendant MAGISTRATE | been filed? No give date filed |
| prior proceedings or appearance(s) CASE NO. | DATE OF Month/Day/Year |
| before U.S. Magistrate regarding this | ARREST 7 |
| defendant were recorded under | Or if Arresting Agency & Warrant were not DATE TRANSFERRED Month/Day/Year |
| Name and Office of Person Furnishing Information on this form BRIAN J. STRETCH | TO U.S. CUSTODY |
| ☑ U.S. Attorney ☐ Other U.S. Agency | |
| Name of Assistant U.S. | This report amends AO 257 previously submitted |
| Attorney (if assigned) Sheila A.G. Armbrust | |
| PROCESS: ADDITIONAL INFO | DRMATION OR COMMENTS ———————————————————————————————————— |
| ☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT | Bail Amount: No Bail |
| If Summons, complete following: | * Where defendant previously apprehended on complaint, no new summons or |
| Arraignment Initial Appearance Defendant Address: | warrant needed, since Magistrate has scheduled arraignment |
| Solondani, Addieso. | Date/Time: Before Judge: |
| | |
| Comments: | |

Attachment to Penalty Sheet Superseding Indictment United States v. Beau Sankene

Offenses Charged and Maximum Penalties (Unless Otherwise Specified)

Count One

21 U.S.C. § 846 - Conspiracy to Manufacture, Distribute, and Possess with

Intent to Distribute a Controlled Substance

5 years of imprisonment

\$250,000 fine

Lifetime supervised release, with a minimum 1 year of supervised release

\$100 mandatory special assessment

Count Nine

18 U.S.C. § 1956(h) - Conspiracy to Commit International Money

Laundering

20 years of imprisonment

\$500,000 fine or twice the value of the property involved in the transaction

3 years of supervised release

\$100 mandatory special assessment

Counts Twelve, Fourteen, Fifteen, and Seventeen 18 U.S.C. § 1956(a)(2)(A) – International Money Laundering

20 years of imprisonment

\$500,000 fine or twice the value of the property involved in the transaction

3 years of supervised release

\$100 mandatory special assessment per count

Count Thirty-Three

18 U.S.C. § 2320(a)(4) - Trafficking in a Counterfeit Drug

10 years of imprisonment

\$2,000,000 fine

3 years of supervised release

| Case 4:16-cr-00013-JSW Docume | nt 40 File 05/12/16 Page 8 of 22 |
|---|---|
| AO 257 (Rev. 6/78) | |
| DEFENDANT INFORMATION RELATIVE TO A | CRIMINAL ACTION - IN U.S. DISTRICT COURT |
| BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT | Name of District Court, and/or Judge/Magistrate Location |
| OFFENSE CHARGED SUPERSEDING | NORTHERN DISTRICT OF CALIFORNIA |
| See attached Petty | OAKLAND DIVISION |
| Minor | DEFENDANT - U.S |
| Misde- | |
| ☐ meanor | DISTRICT COURT NUMBER CR 16-00013 JSW NORTHER COURT NUMBER CR 2018 |
| ∑ Felony | DISTRICT COURT NUMBER |
| PENALTY: See attached | CR 16-00013 JSW *** 2010 |
| | WOS OS SOON |
| | DEFENDANT |
| PROCEEDING | IS NOT IN CUSTODY |
| Name of Complaintant Agency, or Person (& Title, if any) | Has not been arrested, pending outcome this proceeding. 1) If not detained give date any prior |
| DEA Special Agent, Andrew Decker | summons was served on above charges |
| person is awaiting trial in another Federal or State Court, | 2) Is a Fugitive |
| ☐ give name of court | |
| | 3) Is on Bail or Release from (show District) |
| this person/proceeding is transferred from another district | |
| per (circle one) FRCrp 20, 21, or 40. Show District | IS IN CUSTODY |
| | 4) On this charge |
| this is a reprosecution of | 5) On another conviction |
| charges previously dismissed which were dismissed on motion SHOW | 5) On another conviction Federal State |
| of: | 6) Awaiting trial on other charges |
| U.S. ATTORNEY DEFENSE | If answer to (6) is "Yes", show name of institution |
| this prosecution relates to a | Head detainer ☐ Yes |
| pending case involving this same defendant MAGISTRATE | Has detainer Life give date |
| CASE NO. | DATE OF Month/Day/Year |
| prior proceedings or appearance(s) before U.S. Magistrate regarding this | ARREST |
| defendant were recorded under | Or if Arresting Agency & Warrant were not |
| Name and Office of Person Furnishing Information on this form BRIAN J. STRETCH | DATE TRANSFERRED Month/Day/Year TO U.S. CUSTODY |
| Furnishing Information on this form BRIAN J. STRETCH STU.S. Attorney Other U.S. Agency | |
| Name of Assistant U.S. | This report amends AO 257 previously submitted |
| Attorney (if assigned) Sheila A.G. Armbrust | |
| PROCESS: ADDITIONAL INFORM | MATION OR COMMENTS |
| | I Amount: No Bail |
| If Summons, complete following: | |

| Name of Assistant U.S. | | | This report am | nends AO 257 previously submitted |
|---|----------------------|---------------|--|---|
| Attorney (if assigned) | Sheila A.C | G. Armbrust | _ | я |
| PROCESS: | | ADDITIONAL IN | FORMATION OR COMMENT | TS |
| SUMMONS | ☐ NO PROCESS* | X WARRANT | Bail Amount: No Bail | _ |
| If Summons, con Arraignment Defendant Addre | ☐ Initial Appearance | Э | * Where defendant previously app warrant needed, since Magistrate | prehended on complaint, no new summons or has scheduled arraignment |
| | | | Date/Time: | Before Judge: |
| Comments: | * | | | |

Attachment to Penalty Sheet Superseding Indictment United States v. Isaiah Clayton

Offenses Charged and Maximum Penalties (Unless Otherwise Specified)

Count One

21 U.S.C. § 846 - Conspiracy to Manufacture, Distribute, and Possess with

Intent to Distribute a Controlled Substance

5 years of imprisonment

\$250,000 fine

Lifetime supervised release, with a minimum 1 year of supervised release

\$100 mandatory special assessment

Count Nine

18 U.S.C. § 1956(h) - Conspiracy to Commit International Money

Laundering

20 years of imprisonment

\$500,000 fine or twice the value of the property involved in the transaction

3 years of supervised release

\$100 mandatory special assessment

Counts Sixteen, Seventeen, Twenty Through Thirty 18 U.S.C. § 1956(a)(2)(A) - International Money Laundering

20 years of imprisonment

\$500,000 fine or twice the value of the property involved in the transaction

3 years of supervised release

\$100 mandatory special assessment per count

AO 257 (Rev. 6/78)

| DEFENDANT INFORMATION RELATIVE TO | A CRIMINAL ACTION - IN U.S. DISTRICT COURT |
|---|--|
| BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT | Name of District Court, and/or Judge/Magistrate Location |
| X SUPERSEDING | |
| OFFENSE CHARGED Soft EROEDING | OAKLAND DIVISION 📐 |
| See attached Petty | DESENDANT HO |
| Minor Misde- | DEFENDANT - U.S |
| meano meano | 7. |
| . Felony | |
| PENALTY: See attached | CR 16-00013 JSW |
| | ORNIA |
| | DEFENDANT |
| PROCEEDING | IS NOT IN CUSTODY Has not been arrested, pending outcome this proceeding. |
| Name of Complaintant Agency, or Person (& Title, if any) | 1) If not detained give date any prior |
| DEA Special Agent, Andrew Decker | summons was served on above charges |
| person is awaiting trial in another Federal or State Court, give name of court | 2) Is a Fugitive |
| — give fiame of court | 3) Is on Bail or Release from (show District) |
| | |
| this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District | |
| | IS IN CUSTODY |
| this is a reprosecution of | 4) On this charge |
| charges previously dismissed | 5) On another conviction Federal State |
| which were dismissed on motion of: | 6) Awaiting trial on other charges |
| U.S. ATTORNEY DEFENSE | If answer to (6) is "Yes", show name of institution |
| this consequition relates to a | |
| this prosecution relates to a pending case involving this same | Has detainer Yes If "Yes" give date |
| defendant MAGISTRATE CASE NO. | been filed? No filed |
| prior proceedings or appearance(s) | DATE OF Month/Day/Year ARREST |
| before U.S. Magistrate regarding this defendant were recorded under | Or if Arresting Agency & Warrant were not |
| Name and Office of Person | DATE TRANSFERRED Month/Day/Year |
| Furnishing Information on this form BRIAN J. STRETCH U.S. Attorney Other U.S. Agency | TO U.S. CUSTODY |
| Name of Assistant U.S. | This report amends AO 257 previously submitted |
| Attorney (if assigned) Sheila A.G. Armbrust | — |
| PROCESS: ADDITIONAL INFO | ORMATION OR COMMENTS — |
| SUMMONS NO PROCESS* WARRANT | Bail Amount: No Bail |
| If Summons, complete following: | * Where defendant previously apprehended on complaint, no new summons or |
| Arraignment Initial Appearance | warrant needed, since Magistrate has scheduled arraignment |
| Defendant Address: | Data/Time: Pofero ludge: |
| | Date/Time: Before Judge: |
| Comments: | |

Attachment to Penalty Sheet Superseding Indictment United States v. Antoine King

Offenses Charged and Maximum Penalties (Unless Otherwise Specified)

Count One

21 U.S.C. § 846 - Conspiracy to Manufacture, Distribute, and Possess with

Intent to Distribute a Controlled Substance

5 years of imprisonment

\$250,000 fine

Lifetime supervised release, with a minimum 1 year of supervised release

\$100 mandatory special assessment

Count Nine

18 U.S.C. § 1956(h) – Conspiracy to Commit International Money

Laundering

20 years of imprisonment

\$500,000 fine or twice the value of the property involved in the transaction

3 years of supervised release

\$100 mandatory special assessment

Counts Thirteen, Eighteen, Nineteen,

Thirty-One, and Thirty-Two 18 U.S.C. § 1956(a)(2)(A) – International Money Laundering

20 years of imprisonment

\$500,000 fine or twice the value of the property involved in the transaction

3 years of supervised release

\$100 mandatory special assessment per count

Count Thirty-Three

18 U.S.C. § 2320(a)(4) - Trafficking in a Counterfeit Drug

10 years of imprisonment

\$2,000,000 fine

3 years of supervised release

United States District Court FILED C

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: OAKLAND



UNITED STATES OF AMERICA,

V.

DAVID BECKFORD, STEPHAN FLORIDA, BEAU SANKENE, ISAIAH CLAYTON, and ANTOINE KING

16 CR 13-35W

DEFENDANT(S).

SUPERSEDING INDICTMENT

COUNT 1: 21 U.S.C. § 846 – Conspiracy to Manufacture, Distribute, and Possess with Intent to Distribute a Controlled Substance; COUNTS 2, 3, 4, and 7: 21 U.S.C. § 841(a)(1) – Manufacture, Distribution, and Possession of a Schedule IV Controlled Substance with Intent to Distribute; COUNT 5: 18 U.S.C. § 922(g) – Felon in Possession of a Firearm and Ammunition; COUNT 6: 18 U.S.C. § 924(c) – Possession of a Firearm in Furtherance of a Drug Trafficking Crime; COUNT 8: 21 U.S.C. § 333(i)(3) – Sale of Counterfeit Drugs; COUNT 9: 18 U.S.C. § 1956(h) – Conspiracy to Commit International Money Laundering; COUNTS 10-32: 18 U.S.C. § 1956(a)(2)(A) – International Money Laundering; COUNT 33: 18 U.S.C. § 2320(a) (4) – Trafficking in a Counterfeit Drug; Forfeiture Allegations

| A true bill. | | | |
|--------------------------|--------|---------|---------|
| CHOC. | | • | |
| 2000 | | | Foreman |
| Filed in open court this | 12th | _day of | May |
| | 26 | 016 | |
| Duleu | one | • | |
| Am | 5/1: | 16 | Clerk |
| | Ba | nil, \$ | |
| no process for Be | defior | d on | Florida |

BRIAN J. STRETCH (CABN 163973) United States Attorney



MAY 12 2016

SUSAN Y. SOONG CLERK, U.S. DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA OAKLAND



UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

| UNITED STATES OF AMERICA, | No. CR 16-00013 JSW |
|---|--|
| Plaintiff, v. DAVID BECKFORD, STEPHAN FLORIDA, BEAU SANKENE, ISAIAH CLAYTON, and ANTOINE KING, Defendants. | VIOLATIONS: 21 U.S.C. § 846 - Conspiracy to Manufacture, Distribute, and Possess with Intent to Distribute a Controlled Substance; 21 U.S.C. § 841(a)(1) - Manufacture, Distribution, and Possession of a Controlled Substance with Intent to Distribute; 18 U.S.C. § 922(g) - Felon in Possession of a Firearm and Ammunition; 18 U.S.C. § 924(c) - Possession of a Firearm in Furtherance of Drug Trafficking; 21 U.S.C. § 952, 960 - Importation of Schedule II Controlled Substance; 21 U.S.C. § 331(i)(3) - Sale of Counterfeit Drugs; 18 U.S.C. § 1956(h) - Conspiracy to Commit International Money Laundering; 18 U.S.C. § 1956(a)(2)(A) - International Money Laundering; 18 U.S.C. § 2320(a)(4) - Trafficking in a Counterfeit Drug; 21 U.S.C. § 853 - Drug Forfeiture; 18 U.S.C. § 924(d) - Firearm Forfeiture; 18 U.S.C. § 982(a)(1) - Money Laundering Forfeiture; Counterfeiting Forfeiture - 18 U.S.C. Section 2323 |
| | |

SUPERSEDING INDICTMENT

The Grand Jury charges:

COUNT ONE:

(21 U.S.C. § 846 - Conspiracy to Manufacture, Distribute, and Possess with

Intent to Distribute Controlled Substances)

Beginning at a time unknown to the Grand Jury, but no later than January 17, 2014, and continuing to on or about December 12, 2015, in the Northern District of California and elsewhere, the

SUPERSEDING INDICTMENT



| 1 | defendants, |
|----------|--|
| 2 | DAVID BECKFORD, STEPHAN FLORIDA, |
| 3 | ISAIAH CLAYTON, ANTOINE KING, and BEAU SANKENE, |
| 4 | |
| 5 | did knowingly and intentionally conspire with each other and other persons known and unknown to the |
| 6 | Grand Jury to distribute a Schedule IV controlled substance, to wit, alprazolam, in violation of Title 21, |
| 7 | United States Code, Sections 846, 841(a)(1), and 841(b)(2). |
| 8 | COUNT TWO: (21 U.S.C. § 841(a)(1) – Manufacture, Distribution, and Possession with Intent to Distribute Controlled Substances) |
| 10 | On or about February 13, 2015, in the Northern District of California, the defendant, |
| 11 | STEPHAN FLORIDA, |
| 12 | did knowingly and intentionally possess with intent to distribute a Schedule IV controlled substance, to |
| 13 | wit, alprazolam, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(2). |
| 14 15 | COUNT THREE: (21 U.S.C. § 841(a)(1) – Manufacture, Distribution, and Possession with Intent to Distribute Controlled Substances) |
| 16 | On or about September 28, 2015, in the Northern District of California, the defendant, |
| 17 | DAVID BECKFORD, |
| 18 | did knowingly and intentionally possess with intent to distribute a Schedule IV controlled substance, to |
| 19 | wit, alprazolam, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(2). |
| 20 | COUNT FOUR: (21 U.S.C. § 841(a)(1) – Manufacture, Distribution, and Possession with Intent to Distribute Controlled Substances) |
| 21 | Distribute Controlled Substances) |
| 22 | On or about September 28, 2015, in the Northern District of California, the defendant, |
| 23 | DAVID BECKFORD, |
| 24 | did knowingly and intentionally possess with intent to distribute a Schedule II controlled substance, to |
| 25 | wit, cocaine, its salts, optical and geometric isomers, and salts of isomers, in violation of Title 21, |
| 26 | United States Code, Sections 841(a)(1) and 841(b)(1)(C). |
| 27 | |
| 28 | |

| 1 | COUNT FIVE: (18 U.S.C. § 922(g) – Felon in Possession of a Firearm and Ammunition) |
|----|--|
| 2 | On or about September 28, 2015, in the Northern District of California, the defendant, |
| 3 | DAVID BECKFORD, |
| 4 | after having been convicted in a court of a crime punishable by a term of imprisonment exceeding one |
| 5 | year, unlawfully and knowingly possessed a firearm and ammunition, to wit: one Springfield Model |
| 6 | XD-40 Sub-Compact, .40 S&W caliber pistol, bearing serial number GM110782, fifteen rounds of .40 |
| 7 | S&W caliber ammunition bearing head stamp "Hornady 40 S&W," seven rounds of 7.62x39 caliber |
| 8 | ammunition bearing headstamp "04 69," five rounds of 7.62d39 caliber ammunition bearing headstamp |
| 9 | "Tulammo 7.62x39," one round of .45 Auto caliber ammunition bearing headstamp "Federal 45 Auto," |
| 10 | and one round of .380 auto caliber ammunition bearing headstamp "Winchester 380 Auto," in and |
| 11 | affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section |
| 12 | 922(g)(1). |
| 13 | COUNT SIX: (18 U.S.C. § 924(c) – Possession of a Firearm in Furtherance of a Drug |
| 14 | Trafficking Crime) |
| 15 | On or about September 28, 2015, in the Northern District of California, the defendant, |
| 16 | DAVID BECKFORD, |
| 17 | unlawfully and knowingly used and carried a firearm during and in relation to a drug trafficking crime |
| 18 | for which he may be prosecuted in a court of the United States, to wit, the possession of alprazolam and |
| 19 | cocaine with intent to distribute as charged in Counts Three and Four of this Superseding Indictment, |
| 20 | and possessed a firearm in furtherance of the offense charged in Counts Three and Four of this |
| 21 | Superseding Indictment. All in violation of Title 18, United States Code, Section 924(c). |
| 22 | COLDIT SEVEN (21 H.C.C. 8 041/)/1) May Carter District 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 |
| 23 | COUNT SEVEN: (21 U.S.C. § 841(a)(1) – Manufacture, Distribution, and Possession with Intent to Distribute Controlled Substances) |
| 24 | On or about December 12, 2015, in the Northern District of California, the defendants, |
| 25 | DAVID BECKFORD and STEPHAN FLORIDA, |
| 26 | each aided and abetted by the other, did knowingly and intentionally possess with intent to distribute a |
| 27 | Schedule IV controlled substance, to wit, alprazolam, in violation of Title 21, United States Code, |
| 28 | Sections 841(a)(1) and 841(b)(2). |

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<u>COUNT EIGHT</u>: (21 U.S.C. § 333(i)(3) – Sale of Counterfeit Drugs)

Beginning at a time unknown to the Grand Jury, but no later than January 17, 2014, and continuing to on or about December 12, 2015, in the Northern District of California and elsewhere, the defendants,

DAVID BECKFORD and STEPHAN FLORIDA.

did, with intent to defraud and mislead, and without the authorization of Pfizer, Inc., or The Upjohn Company, sell, dispense, and hold for sale and dispensing tablets of alprazolam embossed with the trademark "XANAX®" on one side and the number "2" on the reverse, said marks being the trademark of The Upjohn Company, which drugs were not manufactured by or under the authorization of Pfizer, Inc. or The Upjohn Company, thereby causing the alprazolam tablets to be counterfeit drugs, as defined in 21 U.S.C. § 321(g)(2).

All in violation of Title 21, United States Code, Sections 333(i)(3) and 333(a)(2).

COUNT NINE:

(18 U.S.C. § 1956(h) – Conspiracy to Commit International Money Laundering)

Beginning at a time unknown to the Grand Jury, but no later than January 17, 2014, and continuing to on or about December 12, 2015, in the Northern District of California and elsewhere, the defendants,

DAVID BECKFORD, ISAIAH CLAYTON, ANTOINE KING, and BEAU SANKENE,

did knowingly combine, conspire, and agree with each other and with other persons known and unknown to the Grand Jury to commit offenses against the United State in violation of Title 18, United States Code, Section 1956, specifically, to transport, transmit, and transfer, and attempt to transport, transmit, and transfer, monetary instruments and funds from a place in the United States to a place outside the United States, with the intent to promote the carrying on of a specified unlawful activity, to wit, violating Title 18, United States Code, Section 1956(a)(2)(A).

All in violation of Title 18, United States Code, Section 1956(h).

COUNTS TEN TO THIRTY-TWO: (18 U.S.C. § 1956(a)(2)(A) – International Money Laundering)

On or about the dates listed as to each count below, in the Northern District of California and

elsewhere, the defendants,

DAVID BECKFORD, ISAIAH CLAYTON, ANTOINE KING, and BEAU SANKENE,

did transport, transmit, and transfer, and attempt to transport, transmit, and transfer, a monetary instrument and funds, as described more fully below for each count, to a place outside the United States from a place in the United States, with the intent to promote the carrying on of specified unlawful activity, that is importing into the United States from foreign sources alprazolam, a Schedule X TV controlled substance, and manufacturing and distributing it, in violation of Title 18, United States Code, Section 1956(a)(2)(A).

| COUNT | DEFENDANT | DATE | TRANSACTION |
|-----------|---------------------|------------------|---|
| TEN | BECKFORD | April 21, 2014 | Western Union transfer from California Check Cashing, located at 4300 International Boulevard, Hayward, CA, to China in the amount of \$2,500 with control number -0848. |
| ELEVEN | BECKFORD | May 14, 2014 | Western Union transfer from California Check Cashing, located at 4300 International Boulevard, Hayward, CA, to China in the amount of \$2,400 with control number -0466. |
| TWELVE | BECKFORD SANKENE | July 15, 2014 | Western Union transfer from California Check Cashing, located at 4300 International Boulevard, Hayward, CA, to China in the |
| | BANKLINE | | amount of \$1,700 with control number -1822. |
| THIRTEEN | BECKFORD | October 6, 2014 | Western Union transfer from California Check Cashing, located at 1098 Market Street, |
| | KING | | San Francisco, CA, to China in the amount of \$3,700 with control number -7909. |
| FOURTEEN | BECKFORD | January 15, 2015 | Western Union transfer from California Check Cashing, located at 4300 International |
| | SANKENE | | Boulevard, Hayward, CA, to China in the amount of \$2,000 with control number -3198. |
| FIFTEEN | BECKFORD | January 15, 2015 | Western Union transfer from California Check Cashing, located at 4300 International |
| | SANKENE | | Boulevard, Hayward, CA, to China in the amount of \$2,000 with control number -6054. |
| SIXTEEN | BECKFORD | February 5, 2015 | Western Union transfer from California Check Cashing, located at 4300 International |
| | CLAYTON | | Boulevard, Hayward, CA, to China in the amount of \$4,000 with control number -0772. |
| SEVENTEEN | BECKFORD | May 13, 2015 | Western Union transfer from California |
| | SANKENE | | Check Cashing, located at 4300 International Boulevard, Hayward, CA, to China in the |
| | CLAYTON | | amount of \$4,000 with control number -1048. |

| 1 | COUNT | DEFENDANT | DATE | TRANSACTION |
|----------|-----------------|-----------|---|--|
| 2 | EIGHTEEN | BECKFORD | July 2, 2015 | Western Union transfer from California Check Cashing, located at 4300 International |
| 3 | | KING | | Boulevard, Hayward, CA, to China in the amount of \$2,150 with control number -8468. |
| 4 | NINETEEN | BECKFORD | July 2, 2015 | Western Union transfer from California Check Cashing, located at 4300 International |
| 5 | | KING | | Boulevard, Hayward, CA, to India in the amount of \$1,500 with control number -9628. |
| 6 | TWENTY | BECKFORD | July 20, 2015 | Western Union transfer from California Check Cashing, located at 4300 International |
| 7 | | CLAYTON | | Boulevard, Hayward, CA, to China in the amount of \$700 with control number -1273. |
| 8 | TWENTY- | BECKFORD | July 20, 2015 | Western Union transfer from California Check Cashing, located at 4300 International |
| 9 | ONE | CLAYTON | | Boulevard, Hayward, CA, to China in the amount of \$2,000 with control number -1708. |
| 10 | TWENTY- TWO | BECKFORD | August 7, 2015 | Western Union transfer from California Check Cashing, located at 4300 International |
| 11 | 1 WO | CLAYTON | | Boulevard, Hayward, CA, to Great Britain in the amount of \$1,818 with control number - |
| 12 | ^ ^ 0 | | | 4482. |
| 13 | TWENTY- | BECKFORD | August 18, 2015 | Western Union transfer from California |
| 14 | THREE | CLAYTON | | Check Cashing, located at 4300 International Boulevard, Hayward, CA, to Great Britain in the amount of \$2,000 with control number - |
| 15 | | | - | 3220. |
| 16 | TWENTY- FOUR | BECKFORD | August 19, 2015 | Western Union transfer from California Check Cashing, located at 4300 International |
| 17 18 | FOOR | CLAYTON | 1 | Boulevard, Hayward, CA, to Great Britain in the amount of \$2,000 with control number - 0411. |
| | | | 2 | |
| 19 | TWENTY- FIVE | BECKFORD | September 3, 2015 | Western Union transfer from California Check Cashing, located at 4300 International |
| 20 | | CLAYTON | | Boulevard, Hayward, CA, to China in the amount of \$1,000 with control number -9825. |
| 21 | TWENTY- SIX | BECKFORD | December 8, 2015 | Western Union transfer from California Check Cashing, located at 4300 International |
| 22 | SIX | CLAYTON | | Boulevard, Hayward, CA, to China in the amount of \$1,000 with control number -7399. |
| 23 | TWENTY- | BECKFORD | December 8, 2015 | Western Union transfer from California Check Cashing, located at 4300 International |
| 24 | SEVEN | CLAYTON | | Boulevard, Hayward, CA, to China in the amount of \$1,000 with control number -8459. |
| 25 | TWENTY- | BECKFORD | December 9, 2015 | Western Union transfer from California |
| 26 | EIGHT | CLAYTON | | Check Cashing, located at 4300 International Boulevard, Hayward, CA, to Ukraine in the amount of \$650 with control number -2385. |
| 27 | | | | amount of \$000 with control number -2303. |
| 28 | | | | |

| 1 | COUNT | DEFENDANT | DATE | TRANSACTION | |
|----|--|-----------|-------------------|--|--|
| 2 | TWENTY- | BECKFORD | December 9, 2015 | Western Union transfer from California Check Cashing, located at 4300 International | |
| 3 | NINE | CLAYTON | | Boulevard, Hayward, CA, to China in the amount of \$2,000 with control number -0682. | |
| 4 | THIRTY | BECKFORD | December 9, 2015 | Western Union transfer from California Check Cashing, located at 4300 International | |
| 5 | | CLAYTON | | Boulevard, Hayward, CA, to China in the amount of \$2,000 with control number -0439. | |
| 6 | THIRTY- ONE | BECKFORD | December 10, 2015 | Western Union transfer from California Check Cashing, located at 4300 International | |
| 7 | ONE | KING | | Boulevard, Hayward, CA, to Ukraine in the amount of \$650 with control number -3170. | |
| 8 | THIRTY- | BECKFORD | December 10, 2015 | Western Union transfer from California Check Cashing, located at 4300 International | |
| 9 | TWO | KING | | Boulevard, Hayward, CA, to Ukraine in the amount of \$800 with control number -3955. | |
| 10 | amount of \$600 with control number -5755. | | | | |
| 11 | COUNT THIRTY-THREE: (18 U.S.C. § 2320(a)(4) – Trafficking in a Counterfeit Drug) | | | | |
| 12 | Beginning at a time unknown to the Grand Jury, but no later than January 17, 2014, and | | | | |
| 13 | continuing to on or about December 12, 2015, in the Northern District of California and elsewhere, the | | | | |
| 14 | defendants, | | | | |

DAVID BECKFORD, ANTOINE KING, and

BEAU SANKENE,

intentionally trafficked, and attempted to traffic, in goods, to wit, pills containing alprazolam, and in connection with said goods, knowingly used the counterfeit mark "Xanax," with Xanax® being, at all times relevant to this Superseding Indictment, a prescription drug manufactured by Pfizer, Inc. and the Upjohn Company ("Upjohn"), a trademark of Upjohn, and a trademark registered with the United States Patent and Trademark Office, with Pfizer, Inc. and Upjohn being the only Food and Drug Administration approved manufacturer of Xanax.

All in violation of Title 18, United States Code, Section 2320(a).

<u>FORFEITURE ALLEGATIONS</u>: (18 U.S.C. § 924(d); 21 U.S.C. § 853; 18 U.S.C. § 982(a)(1); 28 U.S.C. § 2461(c); 18 U.S.C. Section 2323)

The factual allegations above are hereby realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture pursuant to the provisions of 18 U.S.C. § 924(d), 21 U.S.C. § 853, 18 U.S.C. § 982(a)(1), and 28 U.S.C. § 2461(c).

Upon a conviction of any of the offenses alleged in Counts One through Four, Seven, and Eight, 1 the defendants, 2 3 DAVID BECKFORD, STEPHAN FLORIDA. ISAIAH CLAYTON, 4 ANTOINE KING, and BEAU SANKENE, 5 shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a), all right, title, 6 and interest in any property constituting or derived from any proceeds defendant obtained, directly or 7 indirectly, as a result of said violations, and any property used, or intended to be used, to commit or to 8 facilitate the commission of such violations, including but not limited to: 9 a money judgment in the amount of the sum of money equal to the total amount of 10 a. money involved in the commission of said offense; 11 one Springfield Model XD-40 Sub-Compact, .40 S&W caliber pistol, bearing 12 b. serial number GM110782; 13 fifteen rounds of .40 S&O caliber ammunition bearing head stamp "Hornady 40 14 c. 15 S&W;" seven rounds of 7.62x39 caliber ammunition bearing headstamp "04 69;" d. 16 five rounds of 7.62d39 caliber ammunition bearing headstamp "Tulammo 17 e. 7.62x39;" 18 one round of .45 Auto caliber ammunition bearing headstamp "Federal 45 Auto;" 19 f. one round of .380 auto caliber ammunition bearing headstamp "Winchester 380 20 g. Auto:" 21 One Glock .40 caliber handgun, bearing serial number AAN917US; h. 22 i. one .40 caliber ammunition loaded and/or seized with the handgun bearing serial 23 number AAN917US; and 24 three boxes of .40 caliber ammunition. 25 j. Upon a conviction of any of the offenses alleged in Counts Five and Six above, the defendant, 26 27 DAVID BECKFORD, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, 28

| 1 | United States Code, Section 2461(c), all right, title, and interest in any firearm and ammunition involved | | | | |
|----|--|--|--|--|--|
| 2 | in or used in any violation of said offenses, including but not limited to: | | | | |
| 3 | a. one Springfield Model XD-40 Sub-Compact, .40 S&W caliber pistol, bearing | | | | |
| 4 | serial number GM110782; | | | | |
| 5 | b. fifteen rounds of .40 S&Q caliber ammunition bearing head stamp "Hornady 40 | | | | |
| 6 | S&W" | | | | |
| 7 | c. seven rounds of 7.62x39 caliber ammunition bearing headstamp "04 69," | | | | |
| 8 | d. five rounds of 7.62d39 caliber ammunition bearing headstamp "Tulammo | | | | |
| 9 | 7.62x39;" | | | | |
| 10 | e. one round of .45 Auto caliber ammunition bearing headstamp "Federal 45 Auto;" | | | | |
| 11 | and | | | | |
| 12 | f. one round of .380 auto caliber ammunition bearing headstamp "Winchester 380 | | | | |
| 13 | Auto." | | | | |
| 14 | Upon a conviction of any of the offenses alleged in Counts Nine through Thirty-Two of the | | | | |
| 15 | Superseding Indictment, the defendants, | | | | |
| 16 | DAVID BECKFORD, ISAIAH CLAYTON, | | | | |
| 17 | | | | | |
| 18 | | | | | |
| 19 | or personal, involved in such offense, and any property traceable to such property. The property to be | | | | |
| 20 | forfeited includes, but is not limited to, the \$46,918 in Western Union wire transfers or attempted wire | | | | |
| 21 | transfers to China, Great Britain, India, the Ukraine from April 21, 2014 through December 10, 2015. | | | | |
| 22 | Upon a conviction of any offense alleged in Count Thirty-Three of the Superseding Indictment, | | | | |
| 23 | the defendants, | | | | |
| 24 | DAVID BECKFORD, ANTOINE KING, and | | | | |
| 25 | BEAU SANKENE, | | | | |
| 26 | shall forfeit to the United States of America, pursuant to Title 18 U.S.C. Section 2323, any article the | | | | |
| 27 | making or trafficking of which is prohibited by such offense, any property used, or intended to be used, | | | | |
| 28 | in any manner or part to commit or facilitate the commission of such offense, and any property | | | | |

constituting or derived from any proceeds obtained directly or indirectly as a result of the commission of 1 such offense. 2 If any of the property described in any of the forfeiture allegations above, as a result of any act or 3 omission of the defendants: 4 5 cannot be located upon the exercise of due diligence: a. has been transferred or sold to or deposited with, a third person; 6 b. has been placed beyond the jurisdiction of the Court; 7 c. 8 d. has been substantially diminished in value; or 9 has been commingled with other property which cannot be divided without e. 10 difficulty; 11 the United States shall be entitled to forfeiture of substitute property pursuant to Title 21, United States 12 Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c), including a money judgment. 13 All in violation of Title 18, United States Code, Section 924(d), Title 21, United States Code, 14 15 Section 853, Title 18, United States Code, Setion 982(a)(1), Title 28, United States Code, Section 2461(c), Title 18 U.S.C. Section 2323, and pursuant to Rule 32.2 of the Federal Rules of Criminal 16 17 Procedure. 18 DATED: 19 A TRUE BILL. 20 21 **FOREPERSON** 22 BRIAN J. STRETCH United States Attorney 23 24 PHILIP A. GUENTERT 25 Deputy Chief, Criminal Division 26 (Approved as to form: 27 AUSA ARMBRUST 28