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EASTERN DISTRICT OF CALIFORNIA
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7 Attorneys for Plaintiff
United States of America
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10 IN THE UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,
13 Plaintiff,
14 v.
15 MATTHEW D. MULLER,
16 Defendant.

CASE NO. **2:15 - CR - - 205 TLN**

18 18 U.S.C. § 1201(a)(1) - Kidnapping; 18 U.S.C. §
19 981(a)(1)(C) and 28 U.S.C. § 2461(c) - Criminal
20 Forfeiture

21 INDICTMENT

22 The Grand Jury charges: T H A T

23 MATTHEW D. MULLER,

24 defendant herein, between on or about March 23, 2015, and continuing through on or about March 25,
25 2015, in the County of Solano, State and Eastern District of California, and elsewhere, did unlawfully
26 seize, confine, kidnap, abduct, carry away, and hold for ransom Victim One, and, in committing and in
27 furtherance of the commission of the offense, used a car, a mobile telephone, the Internet, and the
28 Global Positioning System, each one being a means, facility, and instrumentality of interstate and
foreign commerce, in violation of Title 18, United States Code, Section 1201(a)(1).

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1 FORFEITURE ALLEGATION: [18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) –
2 Criminal Forfeiture]

3 1. Upon conviction of the offense alleged in this Indictment, defendant MATTHEW D.
4 MULLER shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. §
5 2461(c), all property, real and personal, which constitutes or is derived from proceeds traceable to such
6 violations, including, but not limited to:

7 a. A sum of money equal to the amount of proceeds traceable to such offenses, for
8 which defendant is convicted.

9 2. If any property subject to forfeiture, as a result of the offenses alleged in Counts One
10 through Three of this Indictment, for which defendant is convicted:

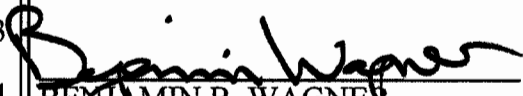
- 11 a. cannot be located upon the exercise of due diligence;
12 b. has been transferred or sold to, or deposited with, a third party;
13 c. has been placed beyond the jurisdiction of the court;
14 d. has been substantially diminished in value; or
15 e. has been commingled with other property which cannot be divided without
16 difficulty;

17 it is the intent of the United States, pursuant to 28 U.S.C. § 2461(c), incorporating 21 U.S.C. § 853(p), to
18 seek forfeiture of any other property of said defendant, up to the value of the property subject to
19 forfeiture.

20 A TRUE BILL.

21 **/s/ Signature on file w/AUSA**

22 FOREPERSON

23 
24 BENJAMIN B. WAGNER
25 United States Attorney

No. _____

2:15 - CR - - 205 TLN

UNITED STATES DISTRICT COURT

Eastern District of California

Criminal Division

THE UNITED STATES OF AMERICA

vs.

MATTHEW D. MULLER

INDICTMENT

**VIOLATION(S): 18 U.S.C. § 1201 – Kidnapping;
18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Criminal Forfeiture**

A true bill,

/s/ Signature on file w/AUSA

Foreman.

Filed in open court this _____ day

of _____, A.D. 20 _____

NO PROCESS NECESSARY

Clerk.

Bail, \$ _____

as true 10/1/15

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United States v. Matthew Muller
Penalties for Indictment

Defendants

Matthew Muller

COUNT 1:

VIOLATION: 18 U.S.C. § 1201(a)(1) - Kidnapping

PENALTIES: Any term of years or for life; or
Fine of up to \$250,000; or both fine and imprisonment
Supervised release of up to 5 years

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

FORFEITURE PENALTY: 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Criminal
Forfeiture