

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

(1) DEREK A. WILLIAMS,
[DOB: 10/08/1981]

(2) ASHLI ADKINS,
[DOB: 02/07/1986]

(3) JASON M. SPARKS,
[DOB: 09/19/1979]

(4) CHARIDY BLANKENSHIP,
[DOB: 09/05/1985]

And

(5) DANIEL R. WILLIAMS,
[DOB: 10/06/1985]

Defendants.

No. _____

COUNT ONE: All Defendants

18 U.S.C. § 1349
NMT 20 Years Imprisonment
NMT \$250,000 Fine
NMT 3 Years Supervised Release
Class C Felony

COUNT TWO: All Defendants

21 U.S.C. §§ 841(a)(1) and 846
NMT 20 Years Imprisonment
NMT \$250,000 Fine
NMT 3 Years Supervised Release
Class C Felony

COUNT THREE: All Defendants

21 U.S.C. §§ 952(a) and 963
NMT 20 Years Imprisonment
NMT \$250,000 Fine
NMT 3 Years Supervised Release
Class C Felony

COUNTS FOUR through NINE: All Defendants

21 U.S.C. §§ 802(32), 813, 841(a)(1), and 18
U.S.C. § 2
NMT 20 Years Imprisonment
NMT \$250,000 Fine
NMT 3 Years Supervised Release
Class C Felony

COUNT TEN: Derek A. Williams, Ashli Adkins, Jason M. Sparks and Daniel R. Williams

18 U.S.C. § 1956(h)
NMT 20 Years Imprisonment
NMT \$500,000 Fine
NMT 3 Years Supervised Release
Class C Felony

COUNTS ELEVEN through THIRTY-NINE: Derek A. Williams, Ashli Adams and Jason M. Sparks

18 U.S.C. § 1957(a)
NMT 10 Years Imprisonment
NMT \$500,000 Fine
NMT 3 Years Supervised Release
Class C Felony

COUNTS FORTY and FORTY-ONE: Derek A. Williams, Ashli Adkins and Daniel R. Williams

18 U.S.C. § 1957(a)
NMT 10 Years Imprisonment
NMT \$500,000
NMT 3 Years Supervised Release
Class C Felony

COUNTS FORTY-TWO and FORTY-THREE: Daniel R. Williams

18 U.S.C. § 1956(a)(1)
NMT 20 Years Imprisonment
NMT \$500,000 Fine
NMT 3 Years Supervised Release
Class C Felony

FORFEITURE ALLEGATION 1

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

FORFEITURE ALLEGATIONS 2 and 3

18 U.S.C § 853
Criminal Forfeiture

\$100 Mandatory Special Assessment Each
Count

DEFENDANT NO.	DEFENDANT NAME	COUNTS CHARGED
1	Derek A. Williams	1-41
2	Ashli Adkins	1-41
3	Jason M. Sparks	1-39
4	Charidy Blankenship	1-9

5	Daniel R. Williams	1-10, 40-43
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INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Conspiracy to Commit Mail Fraud)
18 U.S.C. §§1341 and 1349

Between on or about March 1, 2011, and November 27, 2012, in Jackson and Clay Counties, within the Western District of Missouri, and elsewhere, the defendants, DEREK A. WILLIAMS, ASHLI ADKINS, JASON M. SPARKS, CHARIDY BLANKENSHIP and DANIEL R. WILLIAMS, defendants, did knowingly and intentionally combine, conspire, confederate and agree with each other and others both known and unknown to the grand jury, to commit an offense against the United States, that is, having devised and intended to devise a scheme to defraud the Food and Drug Administration, to defraud the public, and to obtain money by means of materially false and fraudulent pretenses and representations, that false pretenses and representations that SYN INCENSE products “Blond,” “Spearmint,” “Mean Green,” “Orange,” “Fire,” “Ripped,” “Berry Faded,” “Swagg,” “Chill,” “LemonLime,” “Twisted,” “Silver,” “Blowed,” “Suave,” “Smooth,” “Watermelon,” “Vanilla,” “Lite Chocolate,” “Lite Strawberry,” “Lite Cherry,” “Lite Bubble Gum,” “Lite Orange,” and numerous other synthetic cannabinoid products were “incense,” “potpourri,” or “aromas,” and “not for human consumption,” when in truth and fact these substances were synthetic cannabinoids that contained compounds known as 1-pentyl-3-(1-naphthoyl)indole (JWH-018), 1-pentyl-3-(2-chlorophenylacetyl)indole (JWH-203); 1-pentyl-3-(2-methoxyphenylacetyl)indole (JWH-250), 1-pentyl-3-(4-ethyl-1-naphthoyl)indole (JWH-210), 1-(5-fluoropentyl)-3-(2-iodobenzoyl)indole (AM-694),

1-(5-fluoropentyl)-3-(1-naphthoyl)indole (AM-2201); 1-pentyl-3-(4-methyl-1-naphthoyl)indole (JWH-122); 1-pentyl-3-(2,2,3,3-tetramethylcyclopropyl)indole (UR-144), 1-(5-fluoro-pentyl)-3-(2,2,3,3-tetramethylcyclopropyl)indole (XLR11), 1-pentyl-3-[1-(4-methoxynaphthoyl)]indole(JWH-081), 1-hexyl-3-(1-naphthoyl)indole(JWH-019), and 4-Methyl-N-Ethylcathinone(4MEC) that were intended for human consumption as a drug, and for the purpose of executing such scheme and artifice, to mail synthetic cannabinoid products to be sent or delivered by commercial interstate carrier, all contrary to the provisions of Title 18, United States Code, Section 1341.

Manner and Means

The defendants, DEREK A. WILLIAMS, ASHLI ADKINS, JASON M. SPARKS, CHARIDY BLANKINSHIP and DANIEL R. WILLIAMS, used the following manner and means in furtherance of the conspiracy:

a. On or about June 29, 2012, KC INCENSE mailed or caused to be mailed a UPS parcel bearing tracking number 1Z373 5EV 71 9760 9458, from Santa Ana, California, to “Honey Badger, 520 W. 103rd St, Box 121, Kansas City, Missouri 64114” that contained 12 grams of XLR-11 which was identified as “SYN Mean Green.”

b. On or about July 16, 2012, KC INCENSE mailed or caused to be mailed a UPS parcel bearing tracking number 1Z3735EV0298587314, from Santa Ana, California, to “Honey Badger, 520 W. 103rd St, Box 121, Kansas City, Missouri 64114,” that contained 10 grams of XLR-11 which was identified as “SYN Mean Green.”

c. On or about September 19, 2012, KC INCENSE mailed or caused to be mailed a UPS parcel bearing tracking number 1Z3735EV1298013209, from Santa Ana, California, to “Dave/Alex, 8435710143, Wholesale Tobacco & Ale, 1610 Sam Rittenberg

Blvd, Charleston, SC 29407-4902,” that contained 6 grams of UR-144 which was identified as “SYN LemonLime” and “SYN Berry Faded,”

d. On or about October 3, 2012, KC INCENSE mailed or caused to be mailed a UPS parcel bearing the tracking number 1Z3735EV0396997801, from Santa Ana, California, to “Christopher Hatcher, 1800 Cedar St, Greenwood, AR,” that contained 30 grams of XLR-11 which was identified as “SYN Mean Green,”

All in violation of Title 18, United States Code, Section 1349.

COUNT TWO

(Conspiracy to Distribute Controlled Substance)
21 U.S.C. §§ 802(32)(A), 813, 841(a)(1), and 846

Between on or about March 1, 2011, and on or about November 27, 2012, said dates being approximate, in Jackson and Clay Counties, within the Western District of Missouri and elsewhere, the defendants, DEREK A. WILLIAMS, ASHLI ADKINS, JASON M. SPARKS, CHARIDY BLANKENSHIP and DANIEL R. WILLIAMS, did knowingly and intentionally combine, conspire, confederate and agree with each other and others, both known and unknown to the Grand Jury, to distribute the following controlled substance analogues, as defined in Title 21, United States Code, Section 802(32)(A), knowing that each substance was intended for human consumption as provided in Title 21, United States Code, Section 813: JWH-018, JWH-203, JWH-250, JWH-210, AM-694, AM-2201, JWH-122, UR-144, XLR11, JWH-081, JWH-019, and 4MEC, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), all in violation of Title 21, United States Code, Section 846.

COUNT THREE

(Conspiracy to Import Controlled Substance)
21 U.S.C. §§ 802(32)(A), 813, and 952(a)

Between on or about March 1, 2011 and on or about November 27, 2012, said dates being approximate in the Jackson and Clay Counties, within the Western District of Missouri and elsewhere, the defendants, DEREK A. WILLIAMS, ASHLI ADKINS, JASON M. SPARKS, CHARIDY BLANKENSHIP and DANIEL R. WILLIAMS, did knowingly and intentionally combine, conspire, confederate and agree with each other and others, both known and unknown to the Grand Jury, to unlawfully import into the United States the following controlled substance analogues, as defined in Title 21, United States Code, Section 802(32)(A), knowing the substances were intended for human consumption as provided in Title 21, United States Code, Section 813:

JWH-018, JWH-203, JWH-250, JWH-210, AM-694, AM-2201, JWH-122,
UR-144, XLR11, JWH-081, JWH-019, and 4MEC.

Manner and Means

In furtherance of this conspiracy and to effect and accomplish the objects of it, one or more of the conspirators committed the following overt acts:

1. DEREK A. WILLIAMS and ASHLI ADKINS used various e-mail addresses including senoresearchem@gmail.com to facilitate the unlawful importation of controlled substance analogues from sources of supply in China. These substances were then unlawfully distributed all over the United States as part of the conspiracy alleged in Count One;
2. The purpose and intent of the importation of the controlled substance analogues was to distribute them for human consumption in the United States, and DEREK A. WILLIAMS and other co-conspirators did derive substantial income and gross receipts from the unlawful

activities, that is, the primary objective of this conspiracy was to make money through the importation and distribution of illegal drugs.

3. To avoid law enforcement, members of the conspiracy requested the international shipments of the substances to be sent to different addresses in the United States on different dates and that the packages be labeled as “Brightening Agent” “Optical Brightening Agent” and “Pigments” to decrease the likelihood of interception of the packages by United States law enforcement.

4. Members of the conspiracy paid the international sources of supply on numerous occasions using various financial transactions including, but not limited to, money wires and bank transfers.

All contrary to the provisions of Title 21, United States Code, Sections 813, 952(a), 960(b)(3), and 963; and Title 18, United States Code, Section 2.

COUNT FOUR

(Distribution of a Controlled Substance)
21 U.S.C. §§ 802(32)(A), 813, and 841(a)(1)

On or about May 29, 2011, in the Western District of Missouri, and elsewhere, the defendants, DEREK A. WILLIAMS, ASHLI ADKINS, JASON M. SPARKS, CHARIDY BLANKENSHIP and DANIEL R. WILLIAMS, aiding and abetting each other and others both known and unknown to the Grand Jury, knowingly and intentionally distributed, “BLONDE,” a mixture or substance containing a detectable amount of JWH-250, JWH-210, AM-694, and AM-2201, each a controlled substance analogue as defined in Title 21, United States Code, Section 802(32)(A), knowing that the substance was intended for human consumption contrary to the provisions of Title 21, United States Code, Section 813, all in violation of Title 21, United States Code, Sections 841(1)(1), and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FIVE

(Distribution of a Controlled Substance)
21 U.S.C. §§ 802(32)(A), 813, and 841(a)(1)

On or about March 20, 2012, in the Western District of Missouri, and elsewhere, the defendants, DEREK A. WILLIAMS, ASHLI ADKINS, JASON M. SPARKS, CHARIDY BLANKENSHIP and DANIEL R. WILLIAMS, aiding and abetting each other and others both known and unknown to the Grand Jury, knowingly and intentionally distributed, “RIPPED,” “TWISTED,” “LEMON LIME,” “SUAVE,” “MEAN GREEN,” “BLONDE,” “SPEARMINT,” “BERRY FADED,” and “FIRE,” each a mixture or substance containing a detectable amount of XLR11, a controlled substance analogue as defined in Title 21, United States Code, Section 802(32)(A), knowing that the substance was intended for human consumption as provided in Title 21, United States Code, Section 813, contrary to the provisions of Title 21, United States Code, Sections 841(1)(1), and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT SIX

(Distribution of a Controlled Substance)
21 U.S.C. §§ 802(32)(A), 813, and 841(a)(1)

On or about June 29, 2012, in the Western District of Missouri, and elsewhere, the defendants, DEREK A. WILLIAMS, ASHLI ADKINS, JASON M. SPARKS, CHARIDY BLANKENSHIP and DANIEL R. WILLIAMS, aiding and abetting each other and others both known and unknown to the Grand Jury, knowingly and intentionally distributed, “MEAN GREEN,” a mixture or substance containing a detectable amount of XLR11, a controlled substance analogue as defined in Title 21, United States Code, Section 802(32)(A), knowing that the substance was intended for human consumption as provided in Title 21, United States Code,

Section 813, all contrary to the provisions of Title 21, United States Code, Sections 841(1)(1), and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT SEVEN

(Distribution of a Controlled Substance)
21 U.S.C. §§ 802(32)(A), 813, and 841(a)(1)

On or about July 16, 2012, in the Western District of Missouri, and elsewhere, the defendants, DEREK A. WILLIAMS, ASHLI ADKINS, JASON M. SPARKS, CHARIDY BLANKENSHIP and DANIEL R. WILLIAMS, aiding and abetting each other and others both known and unknown to the Grand Jury, knowingly and intentionally distributed, “MEAN GREEN,” a mixture or substance containing a detectable amount of XLR11, a controlled substance analogue as defined in Title 21, United States Code, Section 802(32)(A), knowing that the substance was intended for human consumption as provided in Title 21, United States Code, Section 813, all contrary to the provisions of Title 21, United States Code, Sections 841(1)(1), and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT EIGHT

(Distribution of a Controlled Substance)
21 U.S.C. §§ 802(32)(A), 813, and 841(a)(1)

On or about September 19, 2012, in the Western District of Missouri, and elsewhere, the defendants, DEREK A. WILLIAMS, ASHLI ADKINS, JASON M. SPARKS, CHARIDY BLANKENSHIP and DANIEL R. WILLIAMS, aiding and abetting each other and others both known and unknown to the Grand Jury, knowingly and intentionally distributed, “LEMONLIME,” “BLONDE,” “BERRY FADED,” “SWAGG,” “CHILL,” and “RIPPED,” each a mixture or substance containing a detectable amount of XLR11, each a controlled substance analogue as defined in Title 21, United States Code, Section 802(32)(A), knowing that the

substance was intended for human consumption as provided in Title 21, United States Code, Section 813, contrary to the provisions of Title 21, United States Code, Sections 841(1)(1), and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT NINE

(Distribution of a Controlled Substance)
21 U.S.C. §§ 802(32)(A), 813, and 841(a)(1)

On or about October 3, 2012, in the Western District of Missouri, and elsewhere, the defendants, DEREK A. WILLIAMS, ASHLI ADKINS, JASON M. SPARKS, CHARIDY BLANKENSHIP and DANIEL R. WILLIAMS, aiding and abetting each other and others both known and unknown to the Grand Jury, knowingly and intentionally distributed, “MEAN GREEN,” a mixture or substance containing a detectable amount of XLR11, each a controlled substance analogue as defined in Title 21, United States Code, Section 802(32)(A), knowing that the substance was intended for human consumption as provided in Title 21, United States Code, Section 813, contrary to the provisions of Title 21, United States Code, Sections 841(1)(1), and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TEN

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

Between on or about March 1, 2011, and on or about November 27, 2012, said dates being approximate, in Jackson and Clay Counties, within the Western District of Missouri and elsewhere, the defendants, DEREK A. WILLIAMS, ASHLI ADKINS, JASON M. SPARKS, and DANIEL R. WILLIAMS, did knowingly and intentionally combine, conspire, confederate, and agree with each other and others, both known and unknown to the grand jury, to commit offenses

against the United States contrary to the provisions of Title 18, United States Code, Sections 1956 and 1957, to wit:

a. To knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, conspiracy to distribute mixtures or substances containing a detectable amount of JWH-018, JWH-203, JWH-250, JWH-210, AM-694, AM-2201, JWH-122, UR-144, XLR-11, JWH-081, JWH-019, and 4MEC, each a controlled substance analogue as defined in Title 21, United States Code, Section 802(32)(A), knowing that each substance was intended for human consumption as provided in Title 21, United States Code, Section 813, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), with the intent to promote the carrying on of that specified unlawful activity, 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 Title 18, United States Code, Section 1956(a)(1)(A)(i); and,

b. To knowingly engage and attempt to engage, in monetary transactions by, through or to a financial institution, affecting interstate and foreign commerce in criminally derived property of a value greater than \$10,000, that is, funds, such property having been derived from a specified unlawful activity, that is, conspiracy to distribute mixtures or substances containing a detectable amount of JWH-018, JWH-203, JWH-250, JWH-210, AM-694, AM-2201, JWH-122, UR-144, XLR-11, JWH-081, JWH-019, and 4MEC, each a controlled substance analogue as defined in Title 21, United States Code, Section 802(32)(A), knowing that each substance was intended for human consumption as

provided in Title 21, United States Code, Section 813, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), in violation of Title 18, United States Code, Section 1957(a)

Manner and Means

The manner and means used accomplish the objectives of the conspiracy included, among others, the following:

a. Between March 1, 2011, and November 27, 2012, DEREK A. WILLIAMS and ASHLI ADKINS wire transferred at least \$2,831,912, to Pash Trading Group, Light Commerce Limited, Ai Biotech, All American Containers, RS Hughes Co. Inc, RCS Labs, Inc., and Zombie Matter, LLC, from Bank of America account number ending in 0666.

b. On or about April 11, 2011, DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$81,406.02, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.

c. On or about May 17, 2011, DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$53,971.83, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.

d. On or about June 29, 2011, DEREK A. WILLIAMS and ASHLI ADKINS transferred \$123,600.56, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.

e. On or about August 12, 2011, DEREK A. WILLIAMS and ASHLI ADKINS transferred \$14,179.51, from Bank of America account number ending in 0666, to the Commerce Bank account of DANIEL R. WILLIAMS account number ending in 4550.

f. On or about September 16, 2011, DEREK A. WILLIAMS and ASHLI ADKINS transferred \$18,353.40, from Bank of America account number ending in 0666, to the Commerce Bank account of DANIEL R. WILLIAMS account number ending in 4550.

g. On or about September 26, 2011, DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$147,636.15, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.

h. On or about September 27, 2011, DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$91,371.57, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 4680.

i. On or about October 14, 2011, DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$17,378.16, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.

j. On or about October 17, 2011, DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$14,220.91, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.

k. On or about November 1, 2011, DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$19,410.66, from Bank of America account number ending in

0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.

l. On or about November 9, 2011, DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$11,586.00, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.

m. On or about November 18, 2011, DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$10,390.83, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.

n. On or about November 25, 2011, DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$11,586.00, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.

o. On or about December 12, 2011, DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$23,914.91, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.

p. On or about December 19, 2011, DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$13,532.72, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.

q. On or about January 5, 2012, DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$31,824.60, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.

r. On or about February 9, 2012, DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$11,038.73, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.

s. On or about February 27, 2012, DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$37,530.27, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.

t. On or about March 8, 2012, DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$31,316.24, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.

u. On or about March 23, 2012, DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$21,580.99, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.

v. On or about April 2, 2012, DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$16,020.08, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.

w. On or about April 12, 2012, DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$12,820.94, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.

x. On or about April 24, 2012, DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$18,873.41, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.

y. On or about May 21, 2012, DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$20,500.29, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.

z. On or about June 4, 2012, DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$16,986.68, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.

aa. On or about June 6, 2012, DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$17,573.55, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.

bb. On or about July 16, 2012, DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$55,866.20, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.

cc. On or about August 14, 2012, DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$63,461.85, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.

dd. On or about September 18, 2012, DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$115,234.00, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.

ee. On or about October 9, 2012, DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$72,720.51, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.

ff. On or about November 15, 2012, DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$140,748.68, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748. All in violation of Title 18, United States Code, Section 1956(h)

COUNTS ELEVEN through THIRTY NINE

(Conducting a Financial Transaction in Excess of \$10,000 with Criminally Derived Proceeds)
18 U.S.C. § 1957(a)

On or about the dates set forth below in each individual count, within the Western District of Missouri and elsewhere, DEREK A. WILLIAMS, ASHLI ADAMS and JASON M. SPARKS, defendants, aiding and abetting each other, did knowingly engage and attempt to engage in the following monetary transactions by, through, or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, that is, the deposit and transfer of funds and monetary instruments, such property having been derived from a specified unlawful activity, that is, conspiracy to distribute mixtures or substances containing a detectable amount of JWH-018, JWH-203, JWH-250, JWH-210, AM-694, AM-2201, JWH-122, UR-144, XLR-11, JWH-081, JWH-019, and 4MEC, each a controlled substance analogue as

defined in Title 21, United States Code, Section 802(32)(A), knowing that each substance was intended for human consumption as provided in Title 21, United States Code, Section 813, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C):

COUNT	DATE	MONETARY TRANSACTION
11	April 11, 2011	DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$81,406.02, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.
12	May 17, 2011	DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$53,971.83, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.
13	June 29, 2011	DEREK A. WILLIAMS and ASHLI ADKINS transferred \$123,600.56, from Bank of America account number ending in 0666 to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.
14	September 26, 2011	DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$147,636.15, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.
15	September 27, 2011	DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$91,371.57, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 4680.
16	October 14, 2011	DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$17,378.16, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.
17	October 17, 2011	DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$14,220.91, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.
18	November 1, 2011	DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$19,410.66, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.
19	November 9, 2011	DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$11,586.00, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.

20	November 18, 2011	DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$10,390.83, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.
21	November 25, 2011	DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$11,586.00, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.
22	December 12, 2011	DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$23,914.91, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.
23	December 19, 2011	DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$13,532.72, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.
24	January 5, 2012	DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$31,824.60, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.
25	February 9, 2012	DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$11,038.73, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.
26	February 27, 2012	DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$37,530.27, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.
27	March 8, 2012	DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$31,316.24, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.
28	March 23, 2012	DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$21,580.99, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.
29	April 2, 2012	DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$16,020.08, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.
30	April 12, 2012	DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$12,820.94, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.

31	April 24, 2012	DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$18,873.41, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.
32	May 21, 2012	DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$20,500.29, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.
33	June 4, 2012	DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$16,986.68, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.
34	June 6, 2012	DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$17,573.55, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.
35	July 16, 2012	DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$55,866.20, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.
36	August 14, 2012	DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$63,461.85, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.
37	September 18, 2012	DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$115,234.00, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.
38	October 9, 2012	DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$72,720.51, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.
39	November 15, 2012	DEREK A. WILLIAMS and ASHLI ADKINS wire transferred \$140,748.68, from Bank of America account number ending in 0666, to the Commerce Bank account of JASON M. SPARKS, account number ending in 1748.

All in violation of Title 18, United States Code, Section 1957(a).

COUNTS FORTY and FORTY-ONE

(Conducting a Financial Transaction in Excess of \$10,000 with Criminally Derived Proceeds)
18 U.S.C §§ 1957(a) and 2

On or about the dates set forth below in each individual count, within the Western District of Missouri and elsewhere, DEREK A. WILLIAMS, ASHLI ADKINS, and DANIEL R. WILLIAMS, defendants, aiding and abetting each other and others, did knowingly engage and attempt to engage in the following monetary transactions by, through, or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, that is, the deposit and transfer of funds and monetary instruments, such property having been derived from a specified unlawful activity, that is, conspiracy to distribute mixtures or substances containing a detectable amount of JWH-018, JWH-203, JWH-250, JWH-210, AM-694, AM-2201, JWH-122, UR-144, XLR-11, JWH-081, JWH-019, and 4MEC, each a controlled substance analogue as defined in Title 21, United States Code, Section 802(32)(A), knowing that each substance was intended for human consumption as provided in Title 21, United States Code, Section 813, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C):

COUNT	DATE	MONETARY TRANSACTION
40	August 12, 2011	DEREK A. WILLIAMS and ASHLI ADKINS transferred \$14,179.51, from Bank of America account number ending in 0666, to the Commerce Bank account of DANIEL R. WILLIAMS account number ending in 4550.
41	September 16, 2011	DEREK A. WILLIAMS and ASHLI ADKINS transferred \$18,353.40, from Bank of America account number ending in 0666, to the Commerce Bank account of DANIEL R. WILLIAMS account number ending in 4550.

All in violation of Title 18, United States Code, Section 1957(a).

COUNT FORTY-TWO

(Conducting a Financial Transaction with Criminally Derived Proceeds Designed to avoid the Transaction Reporting Requirements of State or Federal Laws)

18 U.S.C. § 1956(a)(1)(B)(ii)

On or about June 19, 2012, said date being approximate, within the Western District of Missouri and elsewhere, DANIEL R. WILLIAMS, defendant, did knowingly engage and attempt to engage in the following monetary transaction by, through, or to a financial institution, affecting interstate or foreign commerce, knowing that the transaction was designed in whole or in part to avoid a transaction reporting requirement under State or Federal law, that is, the deposit and transfer of funds and monetary instruments, such property having been derived from a specified unlawful activity, that is, conspiracy to distribute mixtures or substances containing a detectable amount of JWH-018, JWH-203, JWH-250, JWH-210, AM-694, AM-2201, JWH-122, UR-144, XLR-11, JWH-081, JWH-019, and 4MEC, each a controlled substance analogue as defined in Title 21, United States Code, Section 802(32)(A), knowing that each substance was intended for human consumption as provided in Title 21, United States Code, Section 813, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C):

COUNT	DATE	MONETARY TRANSACTION
42	June 19, 2012	DANIEL R. WILLIAMS deposited \$9,980, in United States currency into his Commerce Bank money market account number ending in 4551.

All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii).

COUNT FORTY-THREE

(Conducting a Financial Transaction with Criminally Derived Proceeds Designed to conceal or disguise the nature, location, source, ownership or control of the Proceeds)

18 U.S.C. § 1956(a)(1)(B)(i)

On or about June 19, 2012, said date being approximate, within the Western District of Missouri and elsewhere, DANIEL R. WILLIAMS, defendant, did knowingly engage and attempt

to engage in the following monetary transaction by, through, or to a financial institution, affecting interstate or foreign commerce, knowing that the transaction was designed in whole or in part to avoid conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of a specified unlawful activity, that is, conspiracy to distribute mixtures or substances containing a detectable amount of JWH-018, JWH-203, JWH-250, JWH-210, AM-694, AM-2201, JWH-122, UR-144, XLR-11, JWH-081, JWH-019, and 4MEC, each a controlled substance analogue as defined in Title 21, United States Code, Section 802(32)(A), knowing that each substance was intended for human consumption as provided in Title 21, United States Code, Section 813, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C):

COUNT	DATE	MONETARY TRANSACTION
43	June 19, 2012	DANIEL R. WILLIAMS deposited \$80,000, in United States currency into his Commerce Bank safe deposit box number 2026.

All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

FORFEITURE ALLEGATION 1

(In violation of 18 U.S.C. §§ 1341 and 1349 – Mail Fraud)

1. The allegations of Count One of this Indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. As a result of the commission of the violations charged in Count One of this Indictment and upon conviction of the offense alleged in Count One, the defendants, DEREK A. WILLIAMS, ASHLI ADKINS, JASON M. SPARKS, CHARIDY BLANKENSHIP and DANIEL R. WILLIAMS, shall forfeit to the United States of America, any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses alleged in Count One, all pursuant

to Title 18, United States Code, Section 981(a)(a)(C) and Title 28, United States Code, Section 2461(c). The property to be forfeited includes, but is not limited to, the following:

MONEY JUDGMENT

United States currency in the amount of \$10,566,306, constituting proceeds of said violations.

REAL PROPERTY

All of that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments, and easements, located at 1597 Skyline Drive, Laguna Beach, California 92651, and more particularly described as:

“Lot 9 of tract 6271 in the City of Laguna Beach, County of Orange, State of California, as per map recorded in book 253, pages 23 and 24 of the miscellaneous maps, in the office of the County Recorder of said Orange County. Being the same premises as conveyed in deed from Eric C. Rodig and Barbara F. Rodig, husband and wife, as joint tenants recorded August 16, 2012, I document number 2012000472261, in said County and States. Owners of record: DEREK A. WILLIAMS and ASHLI ADKINS.

PERSONAL PROPERTY

A. \$80,000.00 in United States currency seized from Safe Deposit Box 269800002026, at Commerce Bank in the names of DANIEL R. WILLIAMS and Phyllis Fraker on July 12, 2012, and is currently in the custody of the Internal Revenue Service (IRS).

B. \$9,980.00 in United States currency seized from Commerce Bank account number ending in 4551, in the name of DANIEL R. WILLIAMS on July 12, 2012, and is currently in the custody of the IRS.

C. \$1,011,496.97 in United States currency seized from Bank of America account number ending in 0666, in the name of KC Incense, LLC, on or about November 26, 2012, and is currently in the custody of the IRS.

D. \$431,159.34 in United States currency seized from Bank of America account number ending in 9302, in the names of DEREK A. WILLIAMS and ASHLI ADKINS on or about November 26, 2012, and is currently in the custody of the IRS.

E. \$407,786.00 in United States currency seized from Commerce Bank account number ending in 1748, in the names of JASON M. SPARKS and Janet Sparks on or about November 26, 2012, and is currently in the custody of the IRS.

F. \$245,000.00 in United States currency seized from Commerce Bank account number ending in 3679, in the names of JASON M. SPARKS and Janet Sparks on or about November 26, 2012, and is currently in the custody of the IRS.

G. \$241,374.00 in United States currency seized from Commerce Bank account number ending in 4680, in the names of JASON M. SPARKS and Janet Sparks on or about November 26, 2012, and is currently in the custody of the IRS.

H. \$44,592.00 in United States currency seized from Commerce Bank account number ending in 4551, in the name of DANIEL R. WILLIAMS on or about November 26, 2012, and is currently in the custody of the IRS.

I. 2011 Ford F-150, VIN: 1FTFX1EF8BFA20103, registered to DEREK A. WILLIAMS and ASHLI ADKINS, and is currently in the custody of the Drug Enforcement Administration (DEA).

J. 2010 Chevrolet Tahoe, VIN: 1GNUKBE04AR283331, registered to JASON M. SPARKS seized on November 26, 2012, and is currently in the custody of the DEA.

K. \$592,185.00 in United States currency seized from DEREK A. WILLIAMS and ASHLI ADKINS during the execution of a search warrant at 1597 Skyline Drive, Laguna Beach, California on November 27, 2012, and is currently in the custody of the DEA.

L. 2011 Ford Edge Sport Utility Vehicle, VIN: 2FMDK4AK3BBA02891, registered to DEREK A. WILLIAMS and ASHLI ADKINS seized from 1597 Skyline Drive, Laguna Beach, California on November 27, 2012, and is currently in the custody of the DEA.

M. 2008 Kawasaki Ninja ZX-10R motorcycle, VIN: JKAZXCE158A006172 registered to DEREK A. WILLIAMS seized from 1597 Skyline Drive, Laguna Beach, California, on November 27, 2012, and is currently in the custody of the DEA.

N. Glock, Model 26, 9mm pistol, serial number MGA517 seized from DEREK A. WILLIAMS and ASHLI ADKINS during the execution of a search warrant at 1597 Skyline Drive, Laguna Beach, California, on November 27, 2012, and is currently in the custody of the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF).

O. Walther, Model P22, .22 caliber pistol, serial number L261288 seized from DEREK A. WILLIAMS and ASHLI ADKINS during the execution of a search warrant at 1597 Skyline Drive, Laguna Beach, California, on November 27, 2012, and is currently in the custody of the ATF.

P. Mossberg, Model 590, 12 gauge shotgun, serial number T481967 seized from DEREK A. WILLIAMS and ASHLI ADKINS during the execution of a search warrant at 1597 Skyline Drive, Laguna Beach, California, on November 27, 2012, and currently in the custody of the ATF.

Q. Bushmaster, Model XM 15-E2S, .223 caliber rifle, serial number BFI640188 seized from DEREK A. WILLIAMS and ASHLI ADKINS during the execution of a search warrant at 1597 Skyline Drive, Laguna Beach, California, on November 27, 2012, and is currently in the custody of the ATF.

R. \$7,500.00 in United States currency seized on December 4, 2012, in Buckner, Missouri, and is currently in the custody of the DEA.

S. \$100,000.00 in United States currency seized from Bank of America account number 2431873835, on December 13, 2012, pursuant to a federal seizure warrant and is currently in the custody of the IRS.

T. \$43,121.00 in United States currency seized from Bank of America account number 2431370429, on December 13, 2012, pursuant to a federal seizure warrant and is currently in the custody of the IRS.

U. \$174,951.86 in funds for stop payment from Bank of America cashier's check #000832583 purchased by KC Incense LLC on January 4, 2013, from the Eastbluff Banking Center with funds from Bank of America account #355002210666, and payable to KC Incense.

3. If through any act or omission by DEREK A. WILLIAMS, ASHLI ADKINS, JASON M. SPARKS, CHARIDY BLANKENSHIP and DANIEL R. WILLIAMS, defendants, any or all of the above-described property in paragraph 2 (hereinafter the Subject Properties):

- A. cannot be located upon the exercise of due diligence;
- B. has been transferred, or sold to, or deposited with a third person;
- 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 defendants up to the value of the forfeitable property described above, including but not limited to the following:

MONEY JUDGMENT

United States currency in the amount of \$10,566,306, constituting proceeds of said violations.

REAL PROPERTY

All of that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments, and easements, located at 1597 Skyline Drive, Laguna Beach, California 92651 and more particularly described as:

“Lot 9 of tract 6271 in the City of Laguna Beach, County of Orange, State of California, as per map recorded in book 253, pages 23 and 24 of the miscellaneous maps, in the office of the County Recorder of said Orange County. Being the same premises as conveyed in deed from Eric C. Rodig and Barbara F. Rodig, husband and wife, as joint tenants recorded August 16, 2012, I document number 2012000472261, in said County and States. Owners of record: DEREK A. WILLIAMS and ASHLI ADKINS.

PERSONAL PROPERTY

- A. \$80,000.00 in United States currency seized from Safe Deposit Box 269800002026, at Commerce Bank in the names of DANIEL R. WILLIAMS and Phyllis

Fraker on July 12, 2012, and is currently in the custody of the Internal Revenue Service (IRS).

B. \$9,980.00 in United States currency seized from Commerce Bank account number ending in 4551, in the name of DANIEL R. WILLIAMS on July 12, 2012, and is currently in the custody of the IRS.

C. \$1,011,496.97 in United States currency seized from Bank of America account number ending in 0666, in the name of KC Incense, LLC, on or about November 26, 2012, and is currently in the custody of the IRS.

D. \$431,159.34 in United States currency seized from Bank of America account number ending in 9302, in the names of DEREK A. WILLIAMS and ASHLI ADKINS on or about November 26, 2012, and is currently in the custody of the IRS.

E. \$407,786.00 in United States currency seized from Commerce Bank account number ending in 1748, in the names of JASON M. SPARKS and Janet Sparks on or about November 26, 2012, and is currently in the custody of the IRS.

F. \$245,000.00 in United States currency seized from Commerce Bank account number ending in 3679, in the names of JASON M. SPARKS and Janet Sparks on or about November 26, 2012, and is currently in the custody of the IRS.

G. \$241,374.00 in United States currency seized from Commerce Bank account number ending in 4680, in the names of JASON M. SPARKS and Janet Sparks on or about November 26, 2012, and is currently in the custody of the IRS.

H. \$44,592.00 in United States currency seized from Commerce Bank account number ending in 4551, in the name of DANIEL R. WILLIAMS on or about November 26, 2012, and is currently in the custody of the IRS.

I. 2011 Ford F-150, VIN: 1FTFX1EF8BFA20103, registered to DEREK A. WILLIAMS and ASHLI ADKINS, and is currently in the custody of the Drug Enforcement Administration (DEA).

J. 2010 Chevrolet Tahoe, VIN: 1GNUKBE04AR283331, registered to JASON M. SPARKS seized on November 26, 2012, and is currently in the custody of the DEA.

K. \$592,185.00 in United States currency seized from DEREK A. WILLIAMS and ASHLI ADKINS during the execution of a search warrant at 1597 Skyline Drive, Laguna Beach, California on November 27, 2012, and is currently in the custody of the DEA.

L. 2011 Ford Edge Sport Utility Vehicle, VIN: 2FMDK4AK3BBA02891, registered to DEREK A. WILLIAMS and ASHLI ADKINS seized from 1597 Skyline Drive, Laguna Beach, California on November 27, 2012, and is currently in the custody of the DEA.

M. 2008 Kawasaki Ninja ZX-10R motorcycle, VIN: JKAZXCE158A006172 registered to DEREK A. WILLIAMS seized from 1597 Skyline Drive, Laguna Beach, California, on November 27, 2012, and is currently in the custody of the DEA.

N. Glock, Model 26, 9mm pistol, serial number MGA517 seized from DEREK A. WILLIAMS and ASHLI ADKINS during the execution of a search warrant at 1597 Skyline Drive, Laguna Beach, California, on November 27, 2012, and is currently in the custody of the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF).

O. Walther, Model P22, .22 caliber pistol, serial number L261288 seized from DEREK A. WILLIAMS and ASHLI ADKINS during the execution of a search warrant at

1597 Skyline Drive, Laguna Beach, California, on November 27, 2012, and is currently in the custody of the ATF.

P. Mossberg, Model 590, 12 gauge shotgun, serial number T481967 seized from DEREK A. WILLIAMS and ASHLI ADKINS during the execution of a search warrant at 1597 Skyline Drive, Laguna Beach, California, on November 27, 2012, and currently in the custody of the ATF.

Q. Bushmaster, Model XM 15-E2S, .223 caliber rifle, serial number BFI640188 seized from DEREK A. WILLIAMS and ASHLI ADKINS during the execution of a search warrant at 1597 Skyline Drive, Laguna Beach, California, on November 27, 2012, and is currently in the custody of the ATF.

R. \$7,500.00 in United States currency seized on December 4, 2012, in Buckner, Missouri, and is currently in the custody of the DEA.

S. \$100,000.00 in United States currency seized from Bank of America account number 2431873835, on December 13, 2012, pursuant to a federal seizure warrant and is currently in the custody of the IRS.

T. \$43,121.00 in United States currency seized from Bank of America account number 2431370429, on December 13, 2012, pursuant to a federal seizure warrant and is currently in the custody of the IRS.

U. \$174,951.86 in funds for stop payment from Bank of America cashier's check #000832583 purchased by KC Incense LLC on January 4, 2013, from the Eastbluff Banking Center with funds from Bank of America account #355002210666, and payable to KC Incense.

FORFEITURE ALLEGATION 2

(In violation of 21 U.S.C. § 846 –Conspiracy to Distribute)

1. The allegations of Counts Two through Forty-Two of this Indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 21, United States Code, Sections 853(a)(1), 853(a)(2) and 853(p).

2. As a result of the commission of the violations charged in Count Two of this Indictment, DEREK A. WILLIAMS, ASHLI ADKINS, JASON M. SPARKS, CHARIDY BLANKENSHIP and DANIEL R. WILLIAMS defendants, did acquire the following property, which constitutes, and is derived from, the proceeds obtained, directly and indirectly, from said violations, thereby subjecting the property to forfeiture to the United States of America pursuant to the provisions of Title 21, United States Code, Section 853(a)(1):

MONEY JUDGMENT

United States currency in the amount of \$10,566,306, constituting proceeds of said violations.

REAL PROPERTY

All of that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments, and easements, located at 1597 Skyline Drive, Laguna Beach, California 92651 and more particularly described as:

“Lot 9 of tract 6271 in the City of Laguna Beach, County of Orange, State of California, as per map recorded in book 253, pages 23 and 24 of the miscellaneous maps, in the office of the County Recorder of said Orange County. Being the same premises as conveyed in deed from Eric C. Rodig and Barbara F. Rodig, husband and wife, as joint tenants recorded August 16, 2012, I document number 2012000472261, in said County and States. Owners of record: DEREK A. WILLIAMS and ASHLI ADKINS.

PERSONAL PROPERTY

A. \$80,000.00 in United States currency seized from Safe Deposit Box 269800002026, at Commerce Bank in the names of DANIEL R. WILLIAMS and Phyllis Fraker on July 12, 2012, and is currently in the custody of the Internal Revenue Service (IRS).

B. \$9,980.00 in United States currency seized from Commerce Bank account number ending in 4551, in the name of DANIEL R. WILLIAMS on July 12, 2012, and is currently in the custody of the IRS.

C. \$1,011,496.97 in United States currency seized from Bank of America account number ending in 0666, in the name of KC Incense, LLC, on or about November 26, 2012, and is currently in the custody of the IRS.

D. \$431,159.34 in United States currency seized from Bank of America account number ending in 9302, in the names of DEREK A. WILLIAMS and ASHLI ADKINS on or about November 26, 2012, and is currently in the custody of the IRS.

E. \$407,786.00 in United States currency seized from Commerce Bank account number ending in 1748, in the names of JASON M. SPARKS and Janet Sparks on or about November 26, 2012, and is currently in the custody of the IRS.

F. \$245,000.00 in United States currency seized from Commerce Bank account number ending in 3679, in the names of JASON M. SPARKS and Janet Sparks on or about November 26, 2012, and is currently in the custody of the IRS.

G. \$241,374.00 in United States currency seized from Commerce Bank account number ending in 4680, in the names of JASON M. SPARKS and Janet Sparks on or about November 26, 2012, and is currently in the custody of the IRS.

H. \$44,592.00 in United States currency seized from Commerce Bank account number ending in 4551, in the name of DANIEL R. WILLIAMS on or about November 26, 2012, and is currently in the custody of the IRS.

I. 2011 Ford F-150, VIN: 1FTFX1EF8BFA20103, registered to DEREK A. WILLIAMS and ASHLI ADKINS, and is currently in the custody of the Drug Enforcement Administration (DEA).

J. 2010 Chevrolet Tahoe, VIN: 1GNUMBE04AR283331, registered to JASON M. SPARKS seized on November 26, 2012, and is currently in the custody of the DEA.

K. \$592,185.00 in United States currency seized from DEREK A. WILLIAMS and ASHLI ADKINS during the execution of a search warrant at 1597 Skyline Drive, Laguna Beach, California on November 27, 2012, and is currently in the custody of the DEA.

L. 2011 Ford Edge Sport Utility Vehicle, VIN: 2FMDK4AK3BBA02891, registered to DEREK A. WILLIAMS and ASHLI ADKINS seized from 1597 Skyline Drive, Laguna Beach, California on November 27, 2012, and is currently in the custody of the DEA.

M. 2008 Kawasaki Ninja ZX-10R motorcycle, VIN: JKAZXCE158A006172 registered to DEREK A. WILLIAMS seized from 1597 Skyline Drive, Laguna Beach, California, on November 27, 2012, and is currently in the custody of the DEA.

N. Glock, Model 26, 9mm pistol, serial number MGA517 seized from DEREK A. WILLIAMS and ASHLI ADKINS during the execution of a search warrant at 1597

Skyline Drive, Laguna Beach, California, on November 27, 2012, and is currently in the custody of the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF).

O. Walther, Model P22, .22 caliber pistol, serial number L261288 seized from DEREK A. WILLIAMS and ASHLI ADKINS during the execution of a search warrant at 1597 Skyline Drive, Laguna Beach, California, on November 27, 2012, and is currently in the custody of the ATF.

P. Mossberg, Model 590, 12 gauge shotgun, serial number T481967 seized from DEREK A. WILLIAMS and ASHLI ADKINS during the execution of a search warrant at 1597 Skyline Drive, Laguna Beach, California, on November 27, 2012, and currently in the custody of the ATF.

Q. Bushmaster, Model XM 15-E2S, .223 caliber rifle, serial number BFI640188 seized from DEREK A. WILLIAMS and ASHLI ADKINS during the execution of a search warrant at 1597 Skyline Drive, Laguna Beach, California, on November 27, 2012, and is currently in the custody of the ATF.

R. \$7,500.00 in United States currency seized on December 4, 2012, in Buckner, Missouri, and is currently in the custody of the DEA.

S. \$100,000.00 in United States currency seized from Bank of America account number 2431873835, on December 13, 2012, pursuant to a federal seizure warrant and is currently in the custody of the IRS.

T. \$43,121.00 in United States currency seized from Bank of America account number 2431370429, on December 13, 2012, pursuant to a federal seizure warrant and is currently in the custody of the IRS.

U. \$174,951.86 in funds for stop payment from Bank of America cashier's check #000832583 purchased by KC Incense LLC on January 4, 2013, from the Eastbluff Banking Center with funds from Bank of America account #355002210666, and payable to KC Incense.

3. If through any act or omission by DEREK A. WILLIAMS, ASHLI ADKINS, JASON M. SPARKS, CHARIDY BLANKENSHIP and DANIEL R. WILLIAMS, defendants, any or all of the above-described property in paragraph 2 (hereinafter the Subject Properties):

- A. cannot be located upon the exercise of due diligence;
- B. has been transferred, or sold to, or deposited with a third person;
- 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 defendants up to the value of the forfeitable property described above, including but not limited to the following:

MONEY JUDGMENT

United States currency in the amount of \$10,566,306, constituting proceeds of said violations.

REAL PROPERTY

All of that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments, and easements, located at 1597 Skyline Drive, Laguna Beach, California 92651, and more particularly described as:

“Lot 9 of tract 6271 in the City of Laguna Beach, County of Orange, State of California, as per map recorded in book 253, pages 23 and 24 of the miscellaneous maps, in the office of the County Recorder of said Orange County. Being the same premises as conveyed in deed from Eric

C. Rodig and Barbara F. Rodig, husband and wife, as joint tenants recorded August 16, 2012, I document number 2012000472261, in said County and States. Owners of record: DEREK A. WILLIAMS and ASHLI ADKINS.

PERSONAL PROPERTY

A. \$80,000.00 in United States currency seized from Safe Deposit Box 269800002026, at Commerce Bank in the names of DANIEL R. WILLIAMS and Phyllis Fraker on July 12, 2012, and is currently in the custody of the Internal Revenue Service (IRS).

B. \$9,980.00 in United States currency seized from Commerce Bank account number ending in 4551, in the name of DANIEL R. WILLIAMS on July 12, 2012, and is currently in the custody of the IRS.

C. \$1,011,496.97 in United States currency seized from Bank of America account number ending in 0666, in the name of KC Incense, LLC, on or about November 26, 2012, and is currently in the custody of the IRS.

D. \$431,159.34 in United States currency seized from Bank of America account number ending in 9302, in the names of DEREK A. WILLIAMS and ASHLI ADKINS on or about November 26, 2012, and is currently in the custody of the IRS.

E. \$407,786.00 in United States currency seized from Commerce Bank account number ending in 1748, in the names of JASON M. SPARKS and Janet Sparks on or about November 26, 2012, and is currently in the custody of the IRS.

F. \$245,000.00 in United States currency seized from Commerce Bank account number ending in 3679, in the names of JASON M. SPARKS and Janet Sparks on or about November 26, 2012, and is currently in the custody of the IRS.

G. \$241,374.00 in United States currency seized from Commerce Bank account number ending in 4680, in the names of JASON M. SPARKS and Janet Sparks on or about November 26, 2012, and is currently in the custody of the IRS.

H. \$44,592.00 in United States currency seized from Commerce Bank account number ending in 4551, in the name of DANIEL R. WILLIAMS on or about November 26, 2012, and is currently in the custody of the IRS.

I. 2011 Ford F-150, VIN: 1FTFX1EF8BFA20103, registered to DEREK A. WILLIAMS and ASHLI ADKINS, and is currently in the custody of the Drug Enforcement Administration (DEA).

J. 2010 Chevrolet Tahoe, VIN: 1GNUKBE04AR283331, registered to JASON M. SPARKS seized on November 26, 2012, and is currently in the custody of the DEA.

K. \$592,185.00 in United States currency seized from DEREK A. WILLIAMS and ASHLI ADKINS during the execution of a search warrant at 1597 Skyline Drive, Laguna Beach, California, on November 27, 2012, and is currently in the custody of the DEA.

L. 2011 Ford Edge Sport Utility Vehicle, VIN: 2FMDK4AK3BBA02891, registered to DEREK A. WILLIAMS and ASHLI ADKINS seized from 1597 Skyline Drive, Laguna Beach, California, on November 27, 2012, and is currently in the custody of the DEA.

M. 2008 Kawasaki Ninja ZX-10R motorcycle, VIN: JKAZXCE158A006172 registered to DEREK A. WILLIAMS seized from 1597 Skyline Drive, Laguna Beach, California, on November 27, 2012, and is currently in the custody of the DEA.

N. Glock, Model 26, 9mm pistol, serial number MGA517 seized from DEREK A. WILLIAMS and ASHLI ADKINS during the execution of a search warrant at 1597 Skyline Drive, Laguna Beach, California, on November 27, 2012, and is currently in the custody of the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF).

O. Walther, Model P22, .22 caliber pistol, serial number L261288 seized from DEREK A. WILLIAMS and ASHLI ADKINS during the execution of a search warrant at 1597 Skyline Drive, Laguna Beach, California, on November 27, 2012, and is currently in the custody of the ATF.

P. Mossberg, Model 590, 12 gauge shotgun, serial number T481967 seized from DEREK A. WILLIAMS and ASHLI ADKINS during the execution of a search warrant at 1597 Skyline Drive, Laguna Beach, California, on November 27, 2012, and currently in the custody of the ATF.

Q. Bushmaster, Model XM 15-E2S, .223 caliber rifle, serial number BFI640188 seized from DEREK A. WILLIAMS and ASHLI ADKINS during the execution of a search warrant at 1597 Skyline Drive, Laguna Beach, California, on November 27, 2012, and is currently in the custody of the ATF.

R. \$7,500.00 in United States currency seized on December 4, 2012, in Buckner, Missouri, and is currently in the custody of the DEA.

S. \$100,000.00 in United States currency seized from Bank of America account number 2431873835, on December 13, 2012, pursuant to a federal seizure warrant and is currently in the custody of the IRS.

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FORFEITURE ALLEGATION 3

Pursuant to Title 18, United States Code, Section 982(a)(1), each defendant who is convicted of Count Nine shall forfeit to the United States the following property:

A. A money judgment for United States currency in the amount of \$10,566,306, constituting property involved in said violations.

B. All right, title, and interest in any and all property involved in each offense in violation of Title 18, United States Code, Section 1956, or conspiracy to commit such offense, for which the defendant is convicted, and all property traceable to such property, including the following: 1) all money or other property that was the subject of each transaction, transportation, transmission or transfer in violation of Section 1956; 2) all commission, fees and other property constituting proceeds obtained as a result of those violations; 3) all property used in any manner or part to commit or to facilitate the commission of those violations; and 4) the currency, real, and personal property specifically listed in paragraphs 2 and 3 above.

C. A sum of money equal to the total amount of money involved in each offense, or conspiracy to commit such offense, for which the defendant is convicted. If more than one defendant is convicted of an offense, the defendants so convicted are jointly and severally liable for the amount involved in such offense.

D. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), each defendant shall forfeit substitute property, up to the value of the amount described in paragraph 1, if, by any act or omission of the defendant, the property described in paragraph 1, or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred, sold to or deposited with a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

All in accordance with Title 18, United States Code, Section 982(a)(1), and Rule 32.2(a), Federal Rules of Criminal Procedure.

A TRUE BILL.

Dated: 6/20/13

/s/ Boris A. Stancic
FOREPERSON OF THE GRAND JURY

/s/ Catherine Connelly
Catherine Connelly #39018
Assistant United States Attorney