UNITED STATES DISTRICT COURT
District of Minnesota

UNITED STATES OF AMERICA,

Plaintiff,

v.

(1) OMAR SHARIF BEASLEY,
(2) WILLIAM DAVID ALONZO,
(3) TRAVIS JAMES BAKER,
(4) ROSE LYNN BARRETT,
(5) SONNIE MARIE BARRETT,
(6) CALVIN (NMN) BEASLEY,
(7) TIMOTHY JOSEPH BEAULIEU, JR.,
(8) WILLIE (NMN) BELLAMY, JR.,
(9) LAMARCUS ANTONIO BROCK,
(10) MICHAEL TRAVELL COLLINS,
(11) MICHAEL JOSEPH DOMINGUEZ,
(12) STACEY RAE DUCHAINE,
(13) ERNESTINE (NMN) DUKES,
(14) MICHAEL LENIOR DUKES,
(15) BRENDA ANN FAGAN,
(16) WILLIAM JAMES FASTHORSE,
(17) APRIL MARIE GRAVES,
(18) STEPHEN MARTIN HOLLIS,
(19) YALONZO RAMON HULL,
(20) DURIAL JOHN JACKSON,
(21) JUSTIN LEE JOHNSON,
(22) VELVET ILENE JOHNSON,
(23) GENE MICHAEL KEEZER,
(24) NAKOYA HARRIS KEEZER,
(25) RODNEY LEE KEEZER,
(26) JARVIS ALLEN KING,
(27) JODI LYNN KJOLBERG,
(28) YVETTE (NMN) KOUAYARA,
(29) JENNIFER LYNN OPPEGARD,
(30) JESSICA RAE OPPEGARD,
(31) LEE ALLEN OPPEGARD,
(32) BURNEY ABDULAH PEOPLES,
(33) CHRISTOPHER ERVING PEOPLES,

INDICTMENT CR15-165 JRT/LIB

18 U.S.C. § 2
18 U.S.C. § 922(a)(6)
18 U.S.C. § 924(a)(2)
18 U.S.C. § 924(c)
18 U.S.C. § 924(d)(1)
21 U.S.C. § 841(a)(1)
21 U.S.C. § 841(b)(1)(A)
21 U.S.C. § 841(b)(1)(B)
21 U.S.C. § 841(b)(1)(C)
21 U.S.C. § 846
21 U.S.C. § 853
28 U.S.C. § 2461(c)

MAY 2 0 2015
U.S. DISTRICT COURT MPLS

(34) RAVONNA RAYE PEOPLES,
(35) LUCAS JOHN PETERSON,
(36) DOERON EARL RAYFORD,
(37) SHERRLENE ROSE ROBERTS,
(38) MAISIE ANN SARGENT,
(39) DALE ANDREW SIGANA,
(40) SARAH ELIZABETH THOMPSON,
and
(41) ROBYN JOANNE WIPF,

Defendants.

THE UNITED STATES GRAND JURY CHARGES THAT:

BACKGROUND

1. Beginning in or about April 2014, and continuing through in or about April 2015, the defendants, conspiring with and aiding and abetting one another and other persons known and unknown to the grand jury, participated in various roles and ways to procure, transport, and distribute controlled substances including heroin, methamphetamine, oxycodone, hydromorphone, hydrocodone, and methadone to the communities in and surrounding the Red Lake Indian Reservation, the White Earth Indian Reservation, and Native American communities elsewhere.

2. The heroin, methamphetamine, oxycodone, hydromorphone, hydrocodone, and methadone distributed to the communities in and surrounding the Red Lake Indian Reservation, the White Earth Indian Reservation, and Native American communities elsewhere were procured and transported from Detroit, Michigan, Chicago, Illinois, and Minneapolis, Minnesota, among other locations.

DEFENDANTS AND THEIR ROLES

At all times relevant to this Indictment:

3. Defendant **OMAR SHARIF BEASLEY** led, organized, and managed his drug trafficking organization. Defendant **OMAR SHARIF BEASLEY** located and recruited sources, supervisors, managers, distributors, facilitators, couriers, drivers, and other individuals from Detroit, Michigan, Chicago, Illinois, Minneapolis, Minnesota, the Red Lake Indian Reservation, the White Earth Indian Reservation, and elsewhere to aid in the distribution of the controlled substances.

4. Defendants **WILLIAM DAVID ALONZO, CALVIN (NMN) BEASLEY, WILLIE (NMN) BELLAMY, JR., ERNESTINE (NMN) DUKES, MICHAEL LENIOR DUKES, BRENDA ANN FAGAN, VELVET ILENE JOHNSON, YVETTE (NMN) KOUAYARA,** and **BURNEY ABDULAH PEOPLES** did, among other things, advise, facilitate, supervise, manage, transport, receive and transfer funds, and distribute controlled substances during the course of the conspiracy. These defendants were known, located, recruited, travelled to and from, and otherwise found in Detroit, Michigan.

5. Defendants **DOERON EARL RAYFORD** and **LAMARCUS ANTONIO BROCK** did, among other things, facilitate and provide a source of supply of heroin for distribution during the course of the conspiracy. These defendants were known, located, and otherwise found in Chicago, Illinois.

6. Defendant **STEPHEN MARTIN HOLLIS** did, among other things, facilitate and provide a source of supply of heroin for distribution during the course of the

conspiracy. This defendant was known, located, and otherwise found in Minneapolis, Minnesota.

7. Defendant **MICHAEL TRAVELL COLLINS** did, among other things, travel into the District of Minnesota, to supervise, manage, facilitate, and distribute controlled substances during the course of the conspiracy.

8. Defendant **YALONZO RAMON HULL** did, among other things, travel into the District of Minnesota and elsewhere, to supervise, facilitate, transport, and distribute controlled substances during the course of the conspiracy. This defendant was known, located, recruited, travelled to and from, and otherwise found in Milwaukee, Wisconsin.

9. Defendants **STACEY RAE DUCHAINE, SARAH ELIZABETH THOMPSON**, and **JODI LYNN KJOLBERG** did, among other things, supervise, manage, facilitate, transport, and distribute controlled substances during the course of the conspiracy. These defendants were located, recruited, and otherwise found in North Dakota.

10. Defendants **TRAVIS JAMES BAKER, ROSE LYNN BARRETT, SONNIE MARIE BARRETT, TIMOTHY JOSEPH BEAULIEU, JR., MICHAEL JOSEPH DOMINGUEZ, APRIL MARIE GRAVES, JARVIS ALLEN KING, CHRISTOPHER ERVING PEOPLES, RAVONNA RAYE PEOPLES, SHERRLENE ROSE ROBERTS, DALE ANDREW SIGANA, AND ROBYN JOANNE WIPF** did, among other things, facilitate, supervise, manage, transport, maintain residences, receive and transfer funds, and distribute controlled substances

during the course of the conspiracy. These defendants were known, located, recruited, and otherwise found in the communities in or near the Red Lake Indian Reservation.

11. Defendants **WILLIAM JAMES FASTHORSE, DURIAL JOHN JACKSON, JUSTIN LEE JOHNSON, GENE MICHAEL KEEZER, NAKOYA HARRIS KEEZER, RODNEY LEE KEEZER, JENNIFER LYNN OPPEGARD, JESSICA RAE OPPEGARD, LEE ALLEN OPPEGARD, LUCAS JOHN PETERSON, MAISIE ANN SARGENT** did, among other things, facilitate, supervise, manage, transport, maintain residences, receive and transfer funds, and distribute controlled substances during the course of the conspiracy. These defendants were known, located, recruited, and otherwise found in the communities in or near the White Earth Indian Reservation.

COUNT 1

(Conspiracy to Distribute Heroin, Methamphetamine, Oxycodone, Hydromorphone, Hydrocodone, and Methadone)

THE CONSPIRACY

12. Beginning in or about April 2014, and continuing through in or about April 2015, in the State and District of Minnesota and elsewhere, the defendants,

OMAR SHARIF BEASLEY,
WILLIAM DAVID ALONZO,
TRAVIS JAMES BAKER,
ROSE LYNN BARRETT,
SONNIE MARIE BARRETT,
CALVIN (NMN) BEASLEY,
TIMOTHY JOSEPH BEAULIEU, JR.,
WILLIE (NMN) BELLAMY, JR.,
LAMARCUS ANTONIO BROCK,
MICHAEL TRAVELL COLLINS,
MICHAEL JOSEPH DOMINGUEZ,

STACEY RAE DUCHAINE,
ERNESTINE (NMN) DUKES,
MICHAEL LENIOR DUKES,
BRENDA ANN FAGAN,
WILLIAM JAMES FASTHORSE,
APRIL MARIE GRAVES,
STEPHEN MARTIN HOLLIS,
YALONZO RAMON HULL,
DURIAL JOHN JACKSON,
JUSTIN LEE JOHNSON,
VELVET ILENE JOHNSON,
GENE MICHAEL KEEZER,
NAKOYA HARRIS KEEZER,
RODNEY LEE KEEZER,
JARVIS ALLEN KING,
JODI LYNN KJOLBERG,
YVETTE (NMN) KOUAYARA,
JENNIFER LYNN OPPEGARD,
JESSICA RAE OPPEGARD,
LEE ALLEN OPPEGARD,
BURNEY ABDULAH PEOPLES,
CHRISTOPHER ERVING PEOPLES,
RAVONNA RAYE PEOPLES,
LUCAS JOHN PETERSON,
DOERON EARL RAYFORD,
SHERRLENE ROSE ROBERTS,
MAISIE ANN SARGENT,
DALE ANDREW SIGANA,
SARAH ELIZABETH THOMPSON, and
ROBYN JOANNE WIPF,

did knowingly and intentionally conspire with one another and others, known and unknown to the Grand Jury, to possess with intent to distribute and to distribute mixtures and substances containing detectable amounts of heroin, methamphetamine, oxycodone, hydromorphone, hydrocodone, and methadone, in violation of Title 21, United States Code, Section 841(a)(1).

PURPOSE OF THE CONSPIRACY

13. It was the purpose of the conspiracy for the defendants to distribute controlled substances including heroin, methamphetamine, oxycodone, hydromorphone, hydrocodone, and methadone to the communities in and surrounding the Red Lake Indian Reservation and the White Earth Indian Reservation in the State and District of Minnesota, and Native American communities elsewhere.

MANNER AND MEANS

14. To carry out the conspiracy, the defendants, together with others known and unknown to the Grand Jury:

a. Traveled to locations outside the District of Minnesota, including but not limited to Detroit, Michigan, and Chicago, Illinois, to obtain controlled substances including heroin, oxycodone, hydromorphone, hydrocodone, and methadone;

b. Traveled to the Red Lake Indian Reservation and White Earth Indian Reservation within the District of Minnesota and Native American communities elsewhere to distribute controlled substances including heroin, methamphetamine, oxycodone, hydromorphone, hydrocodone, and methadone;

c. Possessed with intent to distribute controlled substances including heroin, methamphetamine, oxycodone, hydromorphone, hydrocodone, and methadone; and

d. Distributed controlled substances including heroin, methamphetamine, oxycodone, hydromorphone, hydrocodone, and methadone.

OVERT ACTS

15. In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the District of Minnesota and elsewhere:

a. On or about October 3, 2014, in the State and District of Minnesota, the defendants **OMAR SHARIF BEASLEY, SONNIE MARIE BARRETT,** and **MICHAEL LENIOR DUKES,** while aiding and abetting one another and others, known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute approximately 1300 grams of a mixture and substance containing a detectable amount of heroin;

b. On or about November 6, 2014, in the State and District of Minnesota and elsewhere, the defendants, **OMAR SHARIF BEASLEY, CALVIN (NMN) BEASLEY, BRENDA ANN FAGAN, YALONZO RAMON HULL,** and **YVETTE (NMN) KOUAYARA,** while aiding and abetting one another and others, known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute mixtures and substances containing detectable amounts of hydrocodone, hydromorphone, and oxycodone;

c. On or about December 2, 2014, in the State and District of Minnesota, the defendants, **OMAR SHARIF BEASLEY, JODI LYNN KJOLBERG,** and **ROBYN JOANNE WIPF,** while aiding and abetting one another and others, known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to

distribute approximately 48 grams of a mixture and substance containing a detectable amount of heroin;

d. On or about December 9 and 10, 2014, in the State and District of Minnesota, the defendant, **LEE ALLEN OPPEGARD,** did knowingly and intentionally distribute approximately 7 grams of a mixture and substance containing a detectable amount of heroin;

e. On or about December 14, 2014, in the State and District of Minnesota, the defendant, **OMAR SHARIF BEASLEY,** did knowingly and intentionally distribute approximately 13 grams of a mixture and substance containing a detectable amount of heroin;

f. On or about December 16, 2014, in the State and District of Minnesota, the defendant, **OMAR SHARIF BEASLEY,** did knowingly and intentionally distribute approximately 15 grams of a mixture and substance containing a detectable amount of methamphetamine;

g. On or about March 10, 2015, in the State and District of Minnesota, the defendants, **WILLIAM DAVID ALONZO** and **TIMOTHY JOSEPH BEAULIEU, JR.,** while aiding and abetting one another and others, known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute approximately 200 grams of a mixture and substance containing a detectable amount of heroin and other mixtures and substances containing detectable amounts of hydrocodone, methadone, and oxycodone;

h. On or about April 14, 2015, in the State and District of Minnesota, the defendant, **OMAR SHARIF BEASLEY,** did knowingly and intentionally possess with intent to distribute approximately 300 grams of a mixture and substance containing a detectable amount of heroin; and

i. On or about April 15, 2015, in the State and District of Minnesota, the defendant, **STEPHEN MARTIN HOLLIS,** did knowingly and intentionally possess with intent to distribute approximately 200 grams of a mixture and substance containing a detectable amount of heroin.

QUANTITY OF HEROIN INVOLVED IN THE CONSPIRACY

16. With respect to defendants **OMAR SHARIF BEASLEY, WILLIAM DAVID ALONZO, ROSE LYNN BARRETT, SONNIE MARIE BARRETT, WILLIE (NMN) BELLAMY, JR., MICHAEL TRAVELL COLLINS, MICHAEL JOSEPH DOMINGUEZ, MICHAEL LENIOR DUKES, GENE MICHAEL KEEZER, BURNEY ABDULAH PEOPLES, LUCAS JOHN PETERSON,** and **SARAH ELIZABETH THOMPSON,** their conduct as members of the narcotics conspiracy charged in Count 1, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged in Count 1, involved 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A), and quantities of mixtures and substances containing detectable amounts of methamphetamine, oxycodone, hydromorphone, hydrocodone, and methadone, in violation of Title 21, United States Code, Section 841(b)(1)(C).

17. With respect to defendants **TIMOTHY JOSEPH BEAULIEU, JR., LAMARCUS ANTONIO BROCK, ERNESTINE (NMN) DUKES, APRIL MARIE GRAVES, STEPHEN MARTIN HOLLIS, NAKOYA HARRIS KEEZER, RODNEY LEE KEEZER, DOERON EARL RAYFORD,** and **DALE ANDREW SIGANA,** their conduct as members of the narcotics conspiracy charged in Count 1, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged in Count 1, involved 100 grams or more of a mixture and substance containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(B), and quantities of mixtures and substances containing detectable amounts of methamphetamine, oxycodone, hydromorphone, hydrocodone, and methadone, in violation of Title 21, United States Code, Section 841(b)(1)(C).

18. With respect to defendants **TRAVIS JAMES BAKER, CALVIN (NMN) BEASLEY, STACEY RAE DUCHAINE, BRENDA ANN FAGAN, WILLIAM JAMES FASTHORSE, YALONZO RAMON HULL, DURIAL JOHN JACKSON, JUSTIN LEE JOHNSON, VELVET ILENE JOHNSON, JARVIS ALLEN KING, JODI LYNN KJOLBERG, YVETTE (NMN) KOUAYARA, JENNIFER LYNN OPPEGARD, JESSICA RAE OPPEGARD, LEE ALLEN OPPEGARD, CHRISTOPHER ERVING PEOPLES, RAVONNA RAYE PEOPLES, SHERRLENE ROSE ROBERTS, MAISIE ANN SARGENT,** and **ROBYN JOANNE WIPF,** their conduct as members of the narcotics conspiracy charged in Count 1, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged in Count 1, involved quantities of mixtures and substances containing

detectable amounts of heroin, methamphetamine, oxycodone, hydromorphone, hydrocodone, and methadone, in violation of Title 21, United States Code, Section 841(b)(1)(C).

19. All in violation of Title 21, United States Code, Section 846.

COUNT 2
(False Statement During Purchase of a Firearm)

On or about June 12, 2014, in the State and District of Minnesota, the defendant,

TRAVIS JAMES BAKER,

in connection with the acquisition of a firearm, specifically a Glock Model 22 .40 pistol bearing serial number VGG934, from Gander Mountain, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Gander Mountain, which statement was intended and likely to deceive Gander Mountain as to a fact material to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented that he was the actual buyer of the firearm, when in fact he acquired the firearm on behalf of another person, all in violation of Title 18, United States Code, Section 922(a)(6) and Title 18, United States Code, Section 924(a)(2).

COUNT 3
(Possession with Intent to Distribute Heroin)

On or about October 3, 2014, in the State and District of Minnesota, the defendants,

OMAR SHARIF BEASLEY,
SONNIE MARIE BARRETT, and
MICHAEL LENIOR DUKES,

aiding and abetting one another and others, known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute approximately 1300 grams of a mixture and substance containing a detectable amount of heroin, all in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 4
(Possession with Intent to Distribute Heroin)

On or about December 2, 2014, in the State and District of Minnesota, the defendants,

OMAR SHARIF BEASLEY,
JODI LYNN KJOLBERG, and
ROBYN JOANNE WIPF,

aiding and abetting one another and others, known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute approximately 48 grams of a mixture and substance containing a detectable amount of heroin, all in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 5
(Distribution of Heroin)

On or about December 9 and 10, 2014, in the State and District of Minnesota, the defendant,

LEE ALLEN OPPEGARD,

did knowingly and intentionally distribute approximately 7 grams of a mixture and substance containing a detectable amount of heroin, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 6
(Distribution of Heroin)

On or about December 14, 2014, in the State and District of Minnesota, the defendant,

OMAR SHARIF BEASLEY,

did knowingly and intentionally distribute approximately 13 grams of a mixture and substance containing a detectable amount of heroin, all in violation of Title 21, United States Code, Sections 841(a)(1) and Section 841(b)(1)(C).

COUNT 7
(Distribution of Methamphetamine)

On or about December 16, 2014, in the State and District of Minnesota, the defendant,

OMAR SHARIF BEASLEY,

did knowingly and intentionally distribute approximately 15 grams of a mixture and substance containing a detectable amount of methamphetamine, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 8
(Possession with Intent to Distribute Heroin)

On or about March 10, 2015, in the State and District of Minnesota, the defendants,

WILLIAM DAVID ALONZO and
TIMOTHY JOSEPH BEAULIEU, JR.,

aiding and abetting one another and others, known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute approximately 200 grams of a mixture and substance containing a detectable amount of heroin, all in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 9
(Possession with Intent to Distribute Hydrocodone, Methadone, and Oxycodone)

On or about March 10, 2015, in the State and District of Minnesota, the defendants,

WILLIAM DAVID ALONZO and
TIMOTHY JOSEPH BEAULIEU, JR.,

aiding and abetting one another and others, known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute mixtures and substances containing detectable amounts of hydrocodone, methadone, and oxycodone, all in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 10
(Possession of a Firearm During and in Relation to a Drug Trafficking Crime)

On or about March 10, 2015, in the State and District of Minnesota, the defendants,

WILLIAM DAVID ALONZO and
TIMOTHY JOSEPH BEAULIEU, JR.,

aiding and abetting one another, did knowingly possess a firearm in furtherance of a drug trafficking crime for which they each may be prosecuted in a court of the United States, namely, possession with intent to distribute controlled substances as alleged in Count 8, all in violation of Title 18, United States Code, Sections 2 and 924(c).

COUNT 11
(Possession with Intent to Distribute Heroin)

On or about April 14, 2015, in the State and District of Minnesota, the defendant,

OMAR SHARIF BEASLEY,

did knowingly and intentionally possess with intent to distribute approximately 300 grams of a mixture and substance containing a detectable amount of heroin, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 12
(Possession with Intent to Distribute Heroin)

On or about April 15, 2015, in the State and District of Minnesota, the defendant,

STEPHEN MARTIN HOLLIS,

did knowingly and intentionally possess with intent to distribute approximately 200 grams of a mixture and substance containing a detectable amount of heroin, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

FORFEITURE ALLEGATIONS

Counts 1-12 of this Indictment are incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d)(1), Title 21, United States Code, Section 853(a), and Title 28, United States Code, Section 2461(c).

Upon conviction of any of Counts 1, 3-9, 11 and 12 of this Indictment, the defendants,

OMAR SHARIF BEASLEY,
WILLIAM DAVID ALONZO,
TRAVIS JAMES BAKER,
ROSE LYNN BARRETT,
SONNIE MARIE BARRETT,
CALVIN (NMN) BEASLEY,
TIMOTHY JOSEPH BEAULIEU, JR.,
WILLIE (NMN) BELLAMY, JR.,
LAMARCUS ANTONIO BROCK,
MICHAEL TRAVELL COLLINS,
MICHAEL JOSEPH DOMINGUEZ,
STACEY RAE DUCHAINE,
ERNESTINE (NMN) DUKES,
MICHAEL LENIOR DUKES,
BRENDA ANN FAGAN,
WILLIAM JAMES FASTHORSE,
APRIL MARIE GRAVES,
STEPHEN MARTIN HOLLIS,
YALONZO RAMON HULL,
DURIAL JOHN JACKSON,
JUSTIN LEE JOHNSON,
VELVET ILENE JOHNSON,
GENE MICHAEL KEEZER,
NAKOYA HARRIS KEEZER,
RODNEY LEE KEEZER,
JARVIS ALLEN KING,
JODI LYNN KJOLBERG,
YVETTE (NMN) KOUAYARA,
JENNIFER LYNN OPPEGARD,
JESSICA RAE OPPEGARD,
LEE ALLEN OPPEGARD,
BURNEY ABDULAH PEOPLES,
CHRISTOPHER ERVING PEOPLES,
RAVONNA RAYE PEOPLES,
LUCAS JOHN PETERSON,
DOERON EARL RAYFORD,
SHERRLENE ROSE ROBERTS,
MAISIE ANN SARGENT,
DALE ANDREW SIGANA,

SARAH ELIZABETH THOMPSON, and
ROBYN JOANNE WIPF,

shall forfeit to the United States pursuant to Title 21, United States Code, Section 853(a)(1) and (2), any and all property constituting, or derived from, any proceeds the defendants obtained directly or indirectly as a result of said violations, and any and all property used, or intended to be used, in any manner or part to commit or to facilitate the commission of said violations.

Upon conviction of any of Counts 2 and 10 of this Indictment, the defendants,

TRAVIS JAMES BAKER,
WILLIAM DAVID ALONZO, and
TIMOTHY JOSEPH BEAULIEU, JR.,

shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any firearm with accessories or any ammunition involved in a knowing violation of Sections 922(a)(6), 924(a)(2), or 924(c).

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON