

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF NEW MEXICO

FILED
UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

NOV 10 1988

J. J. [Signature] CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ROBERT WIDDOWSON,
a/k/a Rob Sullivan,
a/k/a Bob Widdows,
BRUCE BACHMAN,
MICHAEL WHITELEY,

CRIMINAL NO. 88-459
21 U.S.C. 846: Conspiracy;
21 U.S.C. 841(a)(1): Possession
of N-hydroxy 3, 4-Methylenedioxy-
amphetamine with Intent to
Distribute; 21 U.S.C. 841(a)(1):
Manufacture of N-hydroxy 3, 4-
Methylenedioxyamphetamine;
21 U.S.C. 856: Establishment of
Manufacturing Operations; 18
U.S.C. 2: Aiding and Abetting;
21 U.S.C. 841(a)(1) and 21
U.S.C. 841(b)(1)(C): Distribu-
tion of N-hydroxy 3, 4 Methlene-
dioxyamphetamine.

I N D I C T M E N T

The Grand Jury charges:

COUNT I

From on or about the 25th day of June, 1987, and up through and including the 27th day of October, 1988, in Taos County, in the State and District of New Mexico, and elsewhere, the defendants, ROBERT WIDDOWSON a/k/a Rob Sullivan a/k/a Bob Widdows, BRUCE BACHMAN, and MICHAEL WHITELEY, did unlawfully, knowingly and intentionally combine, conspire, confederate, and agree together and with one another and with other persons whose names are known and unknown to the Grand Jury to commit offenses against the United States, to wit: violation of 21 U.S.C. 841(a)(1) and 21 U.S.C. 841(b)(1)(C), that is, the manufacture of N-hydroxy 3, 4-Methylenedioxyamphetamine, a Schedule I controlled substance.

In violation of 21 U.S.C. 846.

COUNT II

On or about the 27th day of October, 1988, in Taos County, in the State and District of New Mexico, the defendants, ROBERT WIDDOWSON a/k/a Rob Sullivan a/k/a Bob Widdows, BRUCE BACHMAN and MICHAEL WHITELEY, unlawfully, knowingly and intentionally did possess with intent to distribute a quantity of N-hydroxy 3, 4-Methylenedioxyamphetamine, a Schedule I controlled substance.

In violation of 21 U.S.C. 841(a)(1), 21 U.S.C. 841(b)(1)(C) and 18 U.S.C. 2.

COUNT III

On or about the 27th day of October, 1988, in Taos County, in the State and District of New Mexico, the defendants, ROBERT WIDDOWSON a/k/a Rob Sullivan a/k/a Bob Widdows and BRUCE BACHMAN, did unlawfully, knowingly and intentionally did manufacture a quantity of N-hydroxy 3, 4-Methylenedioxyampethamine, a Schedule I controlled substance.

In violation of 21 U.S.C. 841(a)(1), 21 U.S.C. 841(b)(1)(C) and 18 U.S.C. 2.

COUNT IV

On or about the 27th day of October, 1988, in Taos County, in the State and District of New Mexico, the defendant, ROBERT WIDDOWSON a/k/a Rob Sullivan a/k/a Bob Widdowson, unlawfully, willingly and knowingly did maintain a place, to wit: a two-story wooden house located approximately 2 1/2 miles west of intersection U.S. 64 at Rio Grande Gorge Bridge, and approximately one third of

of a mile south on a dirt road from the intersection in Taos County for the purpose of manufacturing a controlled substance, to wit: N-hydroxy 3, 4-Methylenedioxyamphetamine.

In violation of 21 U.S.C. 856 and 18 U.S.C. 2.

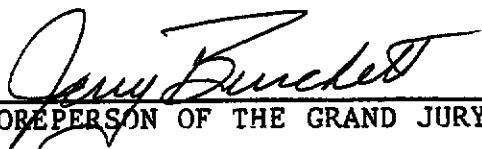
COUNT V

On or about the 21st day of October, 1988, in Taos County, in the State and District of New Mexico, the defendant, ROBERT WIDDOWSON a/k/a Rob Sullivan, a/k/a Bob Widdows, did knowingly and intentionally distribute N-hydroxy 3, 4-Methylenedioxyamphetamine, a Schedule I controlled substance.

In violation of 21 U.S.C. 841(a)(1), 21 U.S.C. 841(b)(1)(C) and 18 U.S.C. 2.

A TRUE BILL:


WILLIAM L. LUTZ
United States Attorney


FOREPERSON OF THE GRAND JURY