

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence of
the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington.

July 28, 2021
By Ravi Subramanian, Clerk
Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff

v.

NICHOLAS PARTLOW,
Defendant.

NO. **CR21-122 RAJ**
INDICTMENT

The Grand Jury charges that:

COUNT 1
(Conspiracy to Distribute Controlled Substances)

Beginning at a time unknown and continuing until on or about November 18,
2020, in King County, within the Western District of Washington, and elsewhere,
NICHOLAS PARTLOW, and others known and unknown, did knowingly and
intentionally conspire to distribute controlled substances under Title 21, United States
Code, Section 812, including methamphetamine, heroin, and N-phenyl-N-[1-(2
phenylethyl)-4-piperidinyl] propenamide, also known as fentanyl.

The Grand Jury further alleges that NICHOLAS PARTLOW's conduct as a
member of the conspiracy charged in Count 1, which includes the reasonably foreseeable
conduct of other members of the conspiracy charged in Count 1, involved 5 grams or
more of methamphetamine, its salts, isomers, and salts of its isomers.

INDICTMENT/PARTLOW - 1

UNITED STATES ATTORNEY
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(206) 553-7970

presented to the Court by the Attorney General
Grand Jury in open Court in the presence of
the Grand Jury and JUDGE in the U.S.
DISTRICT COURT in Seattle, Washington.

By _____
Raymond J. ...
Judge

(C) 1991 - 1992

1 All in violation of Title 21, United States Code, Sections 846, 841(a)(1),
 2 841(b)(1)(B)(viii), and 841(b)(1)(C).

3 **COUNT 2**

4 **(Possession of Methamphetamine with Intent to Distribute)**

5 On or about November 18, 2020, in King County, within the Western District of
 6 Washington, and elsewhere, NICHOLAS PARTLOW did knowingly and intentionally
 7 possess with intent to distribute methamphetamine, a controlled substance under Title 21,
 8 United States Code, Section 812.

9 The Grand Jury further alleges that the offense involved 5 grams or more of
 10 methamphetamine, its salts, isomers, and salts of its isomers.

11 The Grand Jury further alleges that this offense was committed during and in
 12 furtherance of the conspiracy charged above in Count 1.

13 All in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B)(viii).

14 **COUNT 3**

15 **(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)**

16 On or about November 18, 2020, in King County, within the Western District of
 17 Washington, and elsewhere, NICHOLAS PARTLOW did knowingly possess a firearm,
 18 specifically a Taurus TX .22-caliber pistol (serial number 1PT030979) with an attached
 19 Gemtech GM-22 silencer (serial number S14-80906), a modified Savage Arms Stevens
 20 Model 9478 20-gauge shotgun with a sawed-off 12-inch barrel (serial number E834682),
 21 a Charter Arms Undercover .38 Special revolver (serial number 1028060), a Winchester
 22 Model 70 .30-06 bolt-action rifle (serial number 208204) with a Vortex Model 4-16X44
 23 Viper scope (serial number A1900609), and a Remington Model 581 .22-caliber bolt-
 24 action rifle (serial number 36415), in furtherance of a drug trafficking crime for which he
 25 may be prosecuted in a court of the United States, namely conspiracy to distribute
 26 controlled substances, in violation of Title 21, United States Code, Sections 846,
 27 841(a)(1), and 841(b)(1)(C), as charged above in Count 1.

28 All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

ASSET FORFEITURE ALLEGATIONS

All the allegations in this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

Upon conviction of the offenses alleged in Count 1 and 2, the defendant, NICHOLAS PARTLOW, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any proceeds he obtained from the offense and any property that facilitated the offense, including but not limited to:

a. \$4,360 in U.S. currency, seized from Defendant's residence on or about November 18, 2020;

b. Seven wristwatches, including a gold-and-green Rolex and a silver-and-black Bulova, seized from Defendant's residence on or about November 18, 2020;

c. 11.219267790574 Monero (XMR) cryptocurrency, seized from the darknet markets associated with Defendant on or about December 11, 2020;

d. 0.0064688 BTC (Bitcoin) cryptocurrency, seized from the darknet markets associated with Defendant on or about December 11, 2020; and,

e. Electronic equipment seized from Defendant's residence on or about November 18, 2020, including: a Lenovo laptop computer (serial number PF167KKBK); a Dell Inspiron laptop (serial number JSJH723); an HP Chromebook laptop (serial number SCD43848X4); a Microsoft Surface tablet (serial number 032003623652); an Apple iPad tablet (serial number DM537UGG5WQ); a white Apple iPhone 12 Pro (IMEI 353075114538486); a Samsung cellphone (IMEI 353457/101040935/3, serial number R28KC1KZGXP); an LG cellphone (IMEI 405CYUK291630); two Mavic Air 2 drones (serial numbers 3N3BH4K00200FN and 3N3BH8701203KG); a Seagate hard drive (serial number NAAX3TVZ); two WD hard drives (serial numbers WX51Ec65V8NR and wxv1e6889sl6); a Trezor Cold Storage device; and a Samsung 256GB thumb drive.

Upon conviction of the offense alleged in Count 3, the defendant, NICHOLAS PARTLOW shall forfeit to the United States, pursuant to Title 18, United States Code,

1 Section 924(d)(1), by way of Title 28, United States Code, Section 2461(c), any
2 firearms and associated ammunition involved in the offense.

3 **Substitute Assets.** If any of the property described above, as a result of any act or
4 omission of the defendant,

- 5 a. cannot be located upon the exercise of due diligence;
- 6 b. has been transferred or sold to, or deposited with, a third party;
- 7 c. has been placed beyond the jurisdiction of the Court;
- 8 d. has been substantially diminished in value; or
- 9 e. has been commingled with other property which cannot be divided
10 without difficulty;

11 it is the intent of the United States, pursuant to Title 21, United States Code, Section
12 853(p), to seek forfeiture of any property of the defendant up to the value of the above-
13 described forfeitable property

14 A TRUE BILL:

15
16 DATED: 28 July 2021

17 *Signature of Foreperson redacted pursuant*
18 *to the policy of the Judicial Conference of*
19 *the United States.*

20 _____
21 FOREPERSON

22 _____
23 TESSA M. GORMAN
24 Acting United States Attorney

25 _____
26 GRADY J. LEUPOLD
27 Assistant United States Attorney

28 _____
JONAS LERMAN
Assistant United States Attorney

DEFENDANT STATUS SHEET

(One for each defendant)

I. CASE STATUS

Name of Defendant: Nicholas Partlow

Has defendant had initial appearance in this case? ☐ Yes ☒ No

MJ

CR

II. CUSTODIAL STATUS

If defendant had initial appearance, please check one of the following:

- ☐ Continue Conditions of Release
- ☐ Continue Detention
- ☐ Temporary Detention, a detention hearing has been scheduled for

III. ARRAIGNMENT

☒ Warrant to Issue (If so, please complete *Defendant Arrest Warrant Info Sheet*)

☐ Summons to be Issued for Appearance on

Defendant's Address:

☐ Letter to Defense Counsel for Appearance on

Defense Attorney's Name and address:

The estimated trial time is 3 days.

(Revised March 2018)