

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAIME EDWARD MCCLELLAN,
a/k/a Jaime Edward McClennan,
a/k/a Goldie Armani Callaway,
a/k/a Armando Blanco,
a/k/a "Red,"

Defendant.

INDICTMENT *CR 16-102 ADM/HB*

21 U.S.C. § 846

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(A)

21 U.S.C. § 841(b)(1)(C)

21 U.S.C. § 853

18 U.S.C. § 924(c)

18 U.S.C. § 922(g)

18 U.S.C. § 2

THE UNITED STATES GRAND JURY CHARGES THAT:

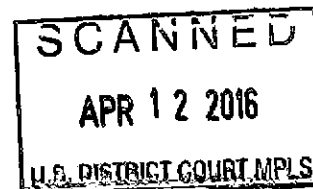
COUNT 1

(Conspiracy to Distribute Heroin)

Beginning in or about January 2014, and continuing through on or about
December 2015, in the State and District of Minnesota and elsewhere, the defendant,

JAIME EDWARD MCCLELLAN,
a/k/a Jaime Edward McClennan,
a/k/a Goldie Armani Callaway,
a/k/a Armando Blanco,
a/k/a "Red,"

knowingly and intentionally conspired with other persons known and unknown to the
Grand Jury to distribute more than 1000 grams of a mixture and substance containing a
detectable amount of heroin, a controlled substance, in violation of Title 21, United
States Code, Sections 841(a)(1), 841(b)(1)(A) and 846.



COUNT 2
(Distribution of Heroin)

On or about July or August, in the State and District of Minnesota, the defendant,

JAIME EDWARD MCCLELLAN,
a/k/a Jaime Edward McClennan,
a/k/a Goldie Armani Callaway,
a/k/a Armando Blanco,
a/k/a "Red,"

aiding and abetting and being aided and abetted by another, knowingly and intentionally distributed a mixture and substance containing a detectable amount of heroin, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 3
(Distribution of Heroin Resulting in Death)

On or about October 24, 2015, in the State and District of Minnesota, the defendant,

JAIME EDWARD MCCLELLAN,
a/k/a Jaime Edward McClennan,
a/k/a Goldie Armani Callaway,
a/k/a Armando Blanco,
a/k/a "Red,"

aiding and abetting and being aided and abetted by another, knowingly and intentionally distributed a mixture and substance containing a detectable amount of heroin, a controlled substance, and the death of A.M. resulted from the use of such controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

U.S. v. Jaime Edward McClellan

COUNT 4
(Distribution of Heroin)

On or about November 12, 2015, in the State and District of Minnesota, the defendant,

JAIME EDWARD MCCLELLAN,
a/k/a Jaime Edward McClennan,
a/k/a Goldie Armani Callaway,
a/k/a Armando Blanco,
a/k/a "Red,"

aiding and abetting and being aided and abetted by another, knowingly and intentionally distributed a mixture and substance containing a detectable amount of heroin, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 5
(Distribution of Heroin)

On or about November 19, 2015, in the State and District of Minnesota, the defendant,

JAIME EDWARD MCCLELLAN,
a/k/a Jaime Edward McClennan,
a/k/a Goldie Armani Callaway,
a/k/a Armando Blanco,
a/k/a "Red,"

aiding and abetting and being aided and abetted by another, knowingly and intentionally distributed a mixture and substance containing a detectable amount of heroin, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

U.S. v. Jaime Edward McClellan

COUNT 6
(Distribution of Heroin)

On or about December 2, 2015, in the State and District of Minnesota, the defendant,

JAIME EDWARD MCCLELLAN,
a/k/a Jaime Edward McClennan,
a/k/a Goldie Armani Callaway,
a/k/a Armando Blanco,
a/k/a “Red,”

aiding and abetting and being aided and abetted by another, knowingly and intentionally distributed a mixture and substance containing a detectable amount of heroin, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 7
(Distribution of Heroin)

On or about December 9, 2015, in the State and District of Minnesota, the defendant,

JAIME EDWARD MCCLELLAN,
a/k/a Jaime Edward McClennan,
a/k/a Goldie Armani Callaway,
a/k/a Armando Blanco,
a/k/a “Red,”

aiding and abetting and being aided and abetted by another, knowingly and intentionally distributed a mixture and substance containing a detectable amount of heroin, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

U.S. v. Jaime Edward McClellan

COUNT 8

(Possession With Intent to Distribute Heroin)

On or about December 16, 2015, in the State and District of Minnesota, the defendant,

JAIME EDWARD MCCLELLAN,
a/k/a Jaime Edward McClennan,
a/k/a Goldie Armani Callaway,
a/k/a Armando Blanco,
a/k/a "Red,"

knowingly and intentionally possessed with the intent to distribute a mixture and substance containing a detectable amount heroin, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 9

(Using and Carrying a Firearm During and in Relation to a Drug Trafficking Crime)

On or about July or August, 2015, in the State and District of Minnesota, the defendant,

JAIME EDWARD MCCLELLAN,
a/k/a Jaime Edward McClennan,
a/k/a Goldie Armani Callaway,
a/k/a Armando Blanco,
a/k/a "Red,"

used and carried a firearm, to wit, a Glock, Model 20, 10mm caliber semi-automatic pistol, bearing serial number WCW040, during and in relation to a drug trafficking crime which may be prosecuted in the United States, namely, distribution of a controlled substance as alleged in Count 2 of the Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

U.S. v. Jaime Edward McClellan

COUNT 10

(Felon in Possession of a Firearm)

On or about December 16, 2015, in the State and District of Minnesota, the defendant,

JAIME EDWARD MCCLELLAN,
a/k/a Jaime Edward McClennan,
a/k/a Goldie Armani Callaway,
a/k/a Armando Blanco,
a/k/a "Red,"

a person who had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, namely, namely, Controlled Substance Crime in the Second Degree, in Ramsey County, Minnesota in 2011, did knowingly possess, in and affecting interstate and foreign commerce, a Glock, Model 20, 10mm caliber semi-automatic pistol, bearing serial number WCW040, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

FORFEITURE ALLEGATIONS

Counts 1-10 of this Indictment are hereby re-alleged and incorporated as if fully set forth herein 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 1-8 of this Indictment, the defendant 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 defendant obtained directly or indirectly as a result of said violations, and any and all property used,

U.S. v. Jaime Edward McClellan

or intended to be used, in any manner or part to commit or to facilitate the commission of said violations, including but not limited to a Glock, Model 20, 10mm caliber semi-automatic pistol, bearing serial number WCW040.

Upon conviction of any of Counts 9-10 of this Indictment, the defendant 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 or used in any knowing violation of section 924(c)(1)(A)(i), 922(g)(1) and 924(a)(2), including a Glock, Model 20, 10mm caliber semi-automatic pistol, bearing serial number WCW040.

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), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON