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CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

BY: 

DEPUTY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
April 2018 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL WRIGHT (1),  
RHIANNON HILLER (2),  
MICHAEL BRANCH (3),  
BRYAN CARLTON (4),  
CHARLES MOORE (5),  
SARA SYVERSON (6),

Defendants.

Case No. **19 CR 363 1 CAB**

I N D I C T M E N T

Title 21, U.S.C., Secs. 841(a)(1) and 846 - Conspiracy to Distribute Controlled Substances; Title 18, U.S.C., Secs. 1956(h), 1956(a)(1)(A)(i) and (a)(1)(B)(i) - Conspiracy to Launder Money; Title 21, U.S.C., Sec. 853 and Title 18, U.S.C., Sec. 982 - Criminal Forfeiture

The grand jury charges:

Count 1

Beginning on a date unknown to the grand jury and continuing up to and including the date of this Indictment, within the Southern District of California and elsewhere, defendants MICHAEL WRIGHT, RHIANNON HILLER, MICHAEL BRANCH, BRYAN CARLTON, CHARLES MOORE, and SARA SYVERSON, did knowingly and intentionally conspire together and with each other and with other persons known and unknown to the grand jury, to distribute 50 grams and more of methamphetamine (actual), a Schedule II Controlled Substance, and marijuana, a Schedule I Controlled Substance; all in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

1 Count 2

2 Beginning on a date unknown to the grand jury and continuing to the  
3 date of this Indictment, within the Southern District of California and  
4 elsewhere, defendant MICHAEL WRIGHT, did knowingly and intentionally  
5 conspire with other persons known and unknown to the grand jury, to  
6 conduct and attempt to conduct financial transactions affecting  
7 interstate commerce, which transactions involved the proceeds of  
8 specified unlawful activity, that is, the felonious distribution of  
9 controlled substances punishable under Title 21, United States Code,  
10 Chapter 13,

11 a. with the intent to promote the carrying on of such specified  
12 unlawful activity in violation of Title 18, United States  
13 Code, Section 1956(a)(1)(A)(i); and

14 b. knowing that the transaction was designed in whole and in part  
15 to conceal and disguise the nature, location, source,  
16 ownership, and control of the proceeds of said specified  
17 unlawful activity, and while conducting and attempting to  
18 conduct such financial transactions knew the property involved  
19 in the financial transaction represented the proceeds of some  
20 form of unlawful activity, in violation of Title 18, United  
21 States Code, Section 1956(a)(1)(B)(i).

22 All in violation of Title 18, United States Code, Section 1956(h).

23 FORFEITURE ALLEGATION

24 1. The allegations contained in Counts 1 and 2 are realleged and  
25 by their reference fully incorporated herein for the purpose of alleging  
26 forfeiture to the United States of America pursuant to the provisions  
27 of Title 21, United States Code, Section 853, and Title 18, United States  
28 Code, Section 982(a)(1).

1           2.    Upon conviction of the felony offense alleged in Count 1 of  
2 this Indictment, said violation being punishable by imprisonment for  
3 more than one year and pursuant to Title 21, United States Code,  
4 Sections 853(a)(1) and 853(a)(2), defendants MICHAEL WRIGHT, RHIANNON  
5 HILLER, MICHAEL BRANCH, BRYAN CARLTON, CHARLES MOORE, and SARA SYVERSON,  
6 shall, upon conviction, forfeit to the United States all their rights,  
7 title and interest in any and all property constituting, or derived  
8 from, any proceeds the defendants obtained, directly or indirectly, as  
9 the result of the offense, and any and all property used or intended to  
10 be used in any manner or part to commit and to facilitate the commission  
11 of the violation alleged in Count 1 of this Indictment.

12           3.    Upon conviction of the offense alleged in Count 2 of this  
13 Indictment, and pursuant to Title 18, United States Code,  
14 Section 982(a)(1), defendant MICHAEL WRIGHT, shall forfeit to the United  
15 States, all property, real and personal, involved in such offense, and  
16 all property traceable to such property.

17           4.    If any of the above-described forfeitable property, as a  
18 result of any act or omission of the defendants:

- 19           a.    cannot be located upon the exercise of due diligence;  
20           b.    has been transferred or sold to, or deposited with, a  
21 third party;  
22           c.    has been placed beyond the jurisdiction of the Court;  
23           d.    has been substantially diminished in value; or  
24           e.    has been commingled with other property which cannot be  
25 subdivided without difficulty;

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1 it is the intent of the United States, pursuant to Title 21, United  
2 States Code, Section 853(p) and Title 18, United States Code,  
3 Section 982(b), to seek forfeiture of any other property of the  
4 defendants up to the value of the property listed above as being subject  
5 to forfeiture.

6 All pursuant to Title 21, United States Code, Section 853, and Title 18,  
7 United States Code, Section 982.

8 DATED: September 13, 2019.

9

A TRUE BILL:

10

  
Foreperson

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12 ROBERT S. BREWER, JR.  
13 United States Attorney

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By:

  
MATTHEW J. SUTTON  
MARIO J. PEIA  
Assistant U.S. Attorneys

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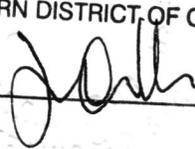
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I hereby attest and certify on 9/16/19  
That the foregoing document is a full, true and correct  
copy of the original on file in my office and in my legal  
custody.  
CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
By  Deputy