

FILED 21 AUG '18 17:45 USDC-ORP

UNDER SEAL

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA

3:18-cr- 00397-HZ

v.

INDICTMENT

COLE WILLIAM GRIFFITHS,

**21 U.S.C. §§ 841(a)(1), (b)(1)(A)(vii),
(b)(1)(B)(vii), 846, 856(a)
18 U.S.C. § 1956(a)(1)(B)(i) and (h)
18 U.S.C. § 922(g)(1)**

Defendant.

Forfeiture Allegations

UNDER SEAL

THE GRAND JURY CHARGES:

COUNT 1

**(Conspiracy to Manufacture, Possess with the Intent to Distribute, and
Distribute Marijuana and to Maintain Drug-Involved Premises)
(21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(vii) and 846)**

Beginning on an unknown date and continuing through the date of this Indictment, in the District of Oregon, the State of Florida and elsewhere, defendant **COLE WILLIAM GRIFFITHS**, and others known and unknown to the grand jury, did knowingly and intentionally combine, conspire, confederate, and agree with each other and other persons whose identities are known and unknown to the Grand Jury to commit the following objects in violation of Title 21, United States Code, Section 846:

Indictment

Objects of the Conspiracy

- A. **Manufacturing Marijuana**: The conspirators agreed to manufacture 1,000 marijuana plants or more, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(vii).
- B. **Possession with Intent to Distribute Marijuana**: The conspirators agreed to possess with intent to distribute 100 kilograms or more of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(vii).
- C. **Distribution of Marijuana**: The conspirators agreed to distribute more than 100 kilograms or more of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(vii).
- D. **Maintaining Drug-Involved Premises**: The conspirators agreed to open, lease, rent, use and maintain facilities for the purpose of manufacturing, possessing and distributing marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 856(a).

Manner and Means

The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

1. It was a part of this conspiracy that defendant and other coconspirators, whose identities are known and unknown to the grand jury, manufactured, grew, harvested and stored marijuana in residences, trailers, and outbuildings in Hood River, Oregon and elsewhere.

2. It was part of this conspiracy that defendant and other coconspirators, whose identities are known and unknown to the grand jury, transported and shipped by U.S. mail distributable quantities of marijuana from Oregon to other States.

3. It was part of this conspiracy that defendant and other coconspirators, whose identities are known and unknown to the grand jury, obtained and maintained vehicles to transport marijuana and drug proceeds in a manner to avoid detection by law enforcement.

4. It was part of this conspiracy that defendant and other coconspirators, whose identities are known and unknown to the grand jury, communicated using cellular telephones to further the conspiracy.

5. It was part of this conspiracy that defendant and other coconspirators, whose identities are known and unknown to the grand jury, transported bulk U.S. currency into Oregon by vehicle and by shipping parcels.

6. It was part of this conspiracy that defendant and other coconspirators, whose identities are known and unknown to the grand jury, purchased vehicles, trailers, heavy equipment, and a boat with drug proceeds from the sale of marijuana.

COUNT 2
(Conspiracy to Commit the Laundering of Monetary Instruments)
(18 U.S.C. §§ 1956(a)(1)(B)(i) and (h))

Beginning on a date unknown and continuing until the date of this Indictment, within the District of Oregon, the State of Florida and elsewhere, defendant **COLE WILLIAM GRIFFITHS** and other persons whose identities are known and unknown to the grand jury, did knowingly combine, conspire, confederate, and agree to knowingly conduct financial transactions involving proceeds from the Unlawful Distribution of a Controlled Substance, that

is, marijuana, a specified unlawful activity affecting interstate commerce, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity: knowing the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of a specified unlawful activity;

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and (h).

COUNT 3
(Felon in Possession of a Firearm)
(18 U.S.C. § 922(g)(1))

On or about April 17, 2018, in the District of Oregon, defendant **COLE WILLIAM GRIFFITHS**, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, specifically Theft in the First Degree, on or about November 22, 2010, in the State of Oregon, Hood River County Circuit Court, did knowingly and unlawfully possess the following firearms:

- (1) Sig Sauer P250 9mm pistol;
- (2) Kimber Solo Carry STS 9mm caliber pistol;
- (3) FN Herstal Five-Seven .57 caliber pistol;
- (4) Anderson Mfg AR-15 .223 caliber rifle;
- (5) Yankee Hill Machine Co., Inc., YHM-15 .223 caliber rifle;
- (6) Browning Citori Special 12 gauge shotgun;
- (7) Remington Arms Company, Inc., 870 Wingmaster 12 gauge shotgun;
- (8) Anderson Mfg. AR-15 .223 rifle;
- (9) Anderson Mfg. AR-15 .223 rifle;
- (10) Remington Arms Company, Inc., 870 20 gauge shotgun;
- (11) Sturm, Ruger & Co., Inc., 96 .22 caliber rifle;

- (12) Marlin Firearms Company 60 .22 caliber rifle;
- (13) Sturm, Ruger & Co., Inc., 10/22 .22 caliber rifle; and
- (14) Anderson Mfg. AM-15 .556 caliber rifle,

which firearms had previously been shipped or transported in interstate or foreign commerce;

In violation of Title 18, United States Code, Section 922(g)(1).

FIRST FORFEITURE ALLEGATION

Upon conviction of one or more of the controlled substance offenses alleged in Count 1 of this Indictment, defendant shall forfeit to the United States pursuant to 21 U.S.C. § 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations.

SECOND FORFEITURE ALLEGATION

Upon conviction of one or more of the offenses alleged in Count 2 of this Indictment, defendant shall forfeit to the United States pursuant to 18 U.S.C. § 982(a)(1), all property, real and personal, involved in the money laundering offenses and all property traceable to such property.

THIRD FORFEITURE ALLEGATION

Upon conviction of one or more of the offenses alleged in Count 3 of this Indictment, defendant shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), all firearms, ammunition and accessories involved in or used in the commission of the offenses.

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SUBSTITUTE ASSETS

If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property described above.

Dated: August 21, 2018

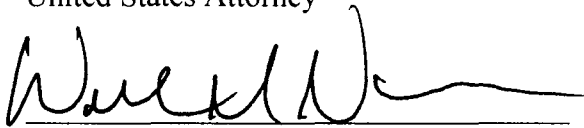
A TRUE BILL.

REDACTED

OFFICIATING FOREPERSON

Presented by:

BILLY J. WILLIAMS
United States Attorney



WILLIAM M. NARUS, CAB #243633
Assistant United States Attorney