

FILED

SEP - 6 2018

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 NATHANIEL HILL, a/k/a "BJ," )  
 LAMAR MCDONALD, )  
 a/k/a "Mike," "Marty," )  
 MAURICE LOVE, )  
 a/k/a "Reece," "Peanut," "Fat Boy" )  
 CANDACE HILL, )  
 EARL MURRAY, a/k/a "E," )  
 TIMOTHY WRIGHT, )  
 JEFFREY WILL, a/k/a "Skinny" )  
 VICTOR PARKER, a/k/a "Blu," )  
 DOUG KELSAY, )  
 MYRON COFFEE, )  
 )  
 Defendants. )

**4:18CR00739 AGF/SPM**

No.  
 Counts I, II, III, IV, V, VI, VII; VIII  
 Count I  
 Counts I, V, VIII  
 Counts I, VIII, IX, X, XI  
 Counts I, XII  
 Counts I, V, VIII  
 Counts I, XIII  
 Count I  
 Count I  
 Counts I, XIV

**INDICTMENT**

**COUNT I**

**CONSPIRACY TO DISTRIBUTE AND POSSESS WITH INTENT TO  
DISTRIBUTE METHAMPHETAMINE**

The Grand Jury charges that:

A. Beginning at an exact time unknown to the Grand Jury but including August 2017 and continuing thereafter to June 2018, in the Eastern District of Missouri and elsewhere,

**NATHANIEL HILL, a/k/a "BJ,"**  
**LAMAR MCDONALD, a/k/a "Mike," "Marty,"**  
**MAURICE LOVE, a/k/a "Reece," "Peanut," "Fat Boy"**  
**CANDACE HILL,**  
**EARL MURRAY, a/k/a "E,"**  
**TIMOTHY WRIGHT,**  
**JEFFREY WILL, a/k/a "Skinny"**

**VICTOR PARKER, a/k/a "Blu,"  
DOUG KELSAY, and  
MYRON COFFEE,**

the defendants herein, did knowingly and willfully conspire, combine, confederate and agree with each other, and other persons known and unknown to this Grand Jury, to commit offenses against the United States, to wit: to distribute and possess with intent to distribute methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); and

**B. MANNER AND MEANS OF THE CONSPIRACY**

The defendants accomplished and attempted to accomplish the objects of the conspiracy in the following manner and through the following means:

1. It is part of said drug trafficking conspiracy that members of the conspiracy arranged for the transportation of large amounts of methamphetamine from California to the St. Louis, Missouri area for distribution.
2. It is part of said drug trafficking conspiracy that members of the conspiracy mailed multi-pound packages of methamphetamine from California to St. Louis County, Missouri for distribution.
3. It is part of said drug trafficking conspiracy that members of the conspiracy arranged for and did in fact distribute methamphetamine in the St. Louis metropolitan area.
4. It is part of said drug trafficking conspiracy that members of the conspiracy possessed firearms in furtherance of their drug activity.
5. It is part of said drug trafficking conspiracy that the distribution of methamphetamine generated significant proceeds.
6. It is part of said drug trafficking conspiracy that members of the conspiracy

transported large amounts of U.S. currency, which were proceeds from the sale of narcotics, from St. Louis, Missouri to California as payment for the narcotics and to ensure future shipments.

7. It is part of said drug trafficking conspiracy that NATHANIEL HILL, a/k/a "BJ," served as the leader of a drug distribution cell in the St. Louis, Missouri area.

8. It is part of said drug trafficking conspiracy that LAMAR MCDONALD, a/k/a "Mike," "Marty," served as a partner with NATHANIEL HILL, a/k/a "BJ," in the drug distribution cell in the St. Louis, Missouri area and arranged locations for shipments of narcotics packages, and divided such packages with NATHANIEL HILL, a/k/a "BJ.

9. It is part of said drug trafficking conspiracy that MAURICE LOVE, a/k/a "Reece," "Peanut," "Fat Boy," supplied the drug trafficking organization with large amounts of methamphetamine from California and, at times, transported the methamphetamine from California to the St. Louis area.

10. It is part of said drug trafficking conspiracy that CANDACE HILL furthered the conspiracy by sending money through Moneygram at Walmart from St. Louis to California to pay for the methamphetamine and the transportation of the methamphetamine.

11. It is part of said drug trafficking conspiracy that EARL MURRAY, a/k/a "E," provided addresses to NATHANIEL HILL, a/k/a "BJ" to receive shipments of methamphetamine from California and took those packages to NATHANIEL HILL, a/k/a "BJ.

12. It is part of said drug trafficking conspiracy that TIMOTHY WRIGHT participated in the transportation of methamphetamine from California to St. Louis and the transportation of U.S. currency as payment for the methamphetamine from St. Louis to California.

13. It is part of the drug trafficking conspiracy that JEFFREY WILL, a/k/a "Skinny," bought ounce quantities of methamphetamine and distributed it.

14. It is part of the drug trafficking conspiracy that VICTOR PARKER, a/k/a "Blu," bought ounce quantities of methamphetamine and distributed it.

15. It is part of the drug trafficking conspiracy that DOUG KELSAY bought ounce quantities of methamphetamine and distributed it.

16. It is part of the drug trafficking conspiracy that MYRON COFFEE received packages of methamphetamine and provide security at the safe house where methamphetamine were stored.

17. It is part of the drug trafficking conspiracy that members of the conspiracy repeatedly used a telephone to cause and facilitate the distribution and possession with intent to distribute methamphetamine.

18. It is part of said drug trafficking conspiracy that on or about August 7, 2017, members of the conspiracy caused the shipment of a U.S. Priority Mail Package 9505513086467216095721 containing approximately 2.9 pounds of methamphetamine from California to members of the conspiracy in St. Louis, Missouri.

19. It is part of said drug trafficking conspiracy that CANDACE HILL tracked the U.S. Priority Mail Package 9505 5130 8646 7216 0957 21 over the internet.

20. It is part of said drug trafficking conspiracy that on October 17, 2017, October 24, 2017, and November 6, 2017, JEFFREY WILL, a/k/a "Skinny," distributed methamphetamine.

21. It is part of said drug trafficking conspiracy that on or about October 22, 2017, CANDACE HILL sent \$2,500 through Moneygram from St. Louis to TIMOTHY WRIGHT in California.

22. It is part of said drug trafficking conspiracy that on November 20, 2017, JEFFREY WILL, a/k/a "Skinny," possessed methamphetamine with the intent to distribute and possessed U.S. currency which constituted drug proceeds.

23. It is part of said drug trafficking conspiracy that on December 12, 2017, January 18, 2018, and February 28, 2018, NATHANIEL HILL, a/k/a "BJ," distributed methamphetamine.

24. It is part of said drug trafficking conspiracy that on or about March 9, 2018, EARL MURRAY, a/k/a "E," and members of the conspiracy caused the shipment of a U.S. Priority Mail Package containing methamphetamine from California to members of the conspiracy at 3265 Kingsley Drive, Florissant, Missouri.

25. It is part of said drug trafficking conspiracy that on or about March 21, 2018, CANDACE HILL sent \$2,400 through Moneygram from St. Louis to MAURICE LOVE, a/k/a "Reece," "Peanut," "Fat Boy" in California.

26. It is part of said drug trafficking conspiracy that on or about April 9, 2018, EARL MURRAY, a/k/a "E," and members of the conspiracy caused the shipment of a U.S. Priority Mail Package 9505 5142 4972 8095 1672 25 containing approximately 9.8 pounds of methamphetamine from California to members of the conspiracy at 6670 Mignon Drive, Florissant, Missouri.

27. It is part of said drug trafficking conspiracy that on or about April 26, 2018, CANDACE HILL sent \$2,500 through Moneygram from St. Louis to MAURICE LOVE, a/k/a "Reece," "Peanut," "Fat Boy" in California.

28. It is part of said drug trafficking conspiracy that on or about June 11, 2018 through June 13, 2018, MAURICE LOVE, a/k/a "Reece," "Peanut," "Fat Boy" and TIMOTHY

WRIGHT transported more than fifty pounds of methamphetamine from California to St. Louis.

29. It is part of said drug trafficking conspiracy that on June 13, 2018, NATHANIEL HILL, a/k/a "BJ," MAURICE LOVE, a/k/a "Reece," "Peanut," "Fat Boy" and TIMOTHY WRIGHT possessed with the intent to distribute over fifty pounds of methamphetamine.

30. It is part of said drug trafficking conspiracy that on June 13, 2018, NATHANIEL HILL, a/k/a "BJ," possessed \$29,850 in drug proceeds.

31. It is part of said drug trafficking conspiracy that on June 13, 2018, NATHANIEL HILL, a/k/a "BJ," possessed firearms in furtherance of the conspiracy.

32. It is part of said drug trafficking conspiracy that on June 13, 2018, LAMAR MCDONALD, a/k/a "Mike," "Marty" possessed firearms in furtherance of the conspiracy.

33. It is part of said drug trafficking conspiracy that on June 13, 2018, LAMAR MCDONALD, a/k/a "Mike," "Marty" possessed \$40,460 in drug proceeds.

34. It is part of said drug trafficking conspiracy that on June 13, 2018, EARL MURRAY, a/k/a "E," possessed a firearm in furtherance of the conspiracy.

35. It is part of said drug trafficking conspiracy that on or about June 13, 2018, MYRON COFFEE possessed a firearm in furtherance of the conspiracy.

36. It is part of said drug trafficking conspiracy that on or about May 8, 2018, May 14, 2018, May 25, 2018, May 30, 2018, June 2, 2018, and June 3, 2018, VICTOR PARKER, a/k/a "Blu" possessed methamphetamine with the intent to distribute.

37. It is part of said drug trafficking conspiracy that on or about June 2, 2018 and June 9, 2018, DOUG KELSAY possessed methamphetamine with the intent to distribute.

The quantity of actual methamphetamine involved in the conspiracy was in excess of 50 grams, punishable under Title 21, United States Code, Section 841(b)(1)(A); and

The quantity of mixture and substance containing a detectable amount of methamphetamine was in excess of 500 grams, punishable under Title 21, United States Code, Section 841(b)(1)(A).

All in violation of Title 21, United States Code, Section 846.

**COUNT II**

**DISTRIBUTION OF METHAMPHETAMINE**

The Grand Jury further charges that:

On or about December 12, 2017, in the Eastern District of Missouri, the defendant,

**NATHANIEL HILL, a/k/a "BJ,"**

did knowingly and intentionally distribute a mixture or substance containing methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

**COUNT III**

**DISTRIBUTION OF METHAMPHETAMINE**

The Grand Jury further charges that:

On or about January 18, 2018, in the Eastern District of Missouri, the defendant,

**NATHANIEL HILL, a/k/a "BJ,"**

did knowingly and intentionally distribute a mixture or substance containing methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

**COUNT IV**

**DISTRIBUTION OF METHAMPHETAMINE**

The Grand Jury further charges that:

On or about February 28, 2018, in the Eastern District of Missouri, the defendant,

**NATHANIEL HILL, a/k/a "BJ,"**

did knowingly and intentionally distribute a mixture or substance containing methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

**COUNT V**

**POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE**

The Grand Jury further charges that:

On or about June 13, 2018, in the Eastern District of Missouri, the defendants,

**NATHANIEL HILL, a/k/a "BJ,"  
MAURICE LOVE, a/k/a "Reece," "Peanut," "Fat Boy"  
and TIMOTHY WRIGHT,**

did knowingly and intentionally possess with the intent to distribute a mixture or substance in excess of 500 grams containing methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

**COUNT VI**

**POSSESSION OF A FIREARM IN FURTHERANCE OF A  
DRUG TRAFFICKING CRIME**

The Grand Jury further charges that:

On or about June 13, 2018, in the Eastern District of Missouri, the defendant,

**NATHANIEL HILL, a/k/a "BJ,"**

did knowingly possess one or more firearms in furtherance of a drug trafficking crime which may be prosecuted in a court of the United States, to wit: conspiracy to distribute and possess with intent to distribute methamphetamine, as charged in Count I and possession with intent to



distribute methamphetamine, as charged in Count V.

In violation of Title 18, United States Code, Section 924(c)(1)(A) and Title 18, United States Code, Section 2.

**COUNT VII**

**FELON IN POSSESSION OF A FIREARM**

The Grand Jury further charges that:

On or about June 13, 2018, in the Eastern District of Missouri, the defendant,

**NATHANIEL HILL, a/k/a "BJ,"**

having been convicted previously of a felony crime punishable by a term of imprisonment exceeding one year, did knowingly possess one or more firearms, which traveled in interstate or foreign commerce during or prior to being in defendant's possession.

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

**COUNT VIII**

The Grand Jury further charges that:

Beginning at a time unknown, but including August 2017 and continuing thereafter to June 2018, in the Eastern District of Missouri and elsewhere,

**NATHANIEL HILL, a/k/a "BJ,"  
MAURICE LOVE, a/k/a "Reece," "Peanut," "Fat Boy"  
CANDACE HILL, and  
TIMOTHY WRIGHT**

the defendants herein, did knowingly combine, conspire, and agree with each other, and with other persons known and unknown to the Grand Jury to commit offenses against the United States, to wit:

a) to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce with the intent to promote the carrying on of the specified

unlawful activity; that is, the distribution of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841 and 846, and

b) to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce with the transactions designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity;

and that while conducting and attempting to conduct such financial transactions, the defendants knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, that is, the distribution of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841 and 846, in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 1956(a)(1)(B)(i).

#### MANNER AND MEANS OF THE CONSPIRACY

1. It was part of said money laundering conspiracy that NATHANIEL HILL, a/k/a "BJ" imported to the Eastern District of Missouri large amounts of methamphetamine from MAURICE LOVE, a/k/a "Reece," "Peanut," "Fat Boy" in California.

2. It was part of said money laundering conspiracy that NATHANIEL HILL, a/k/a "BJ" and others often received the methamphetamine through the U.S. mail at various addresses and distributed the obtained methamphetamine in the Eastern District of Missouri and elsewhere.

3. It was part of said money laundering conspiracy that MAURICE LOVE, a/k/a "Reece," "Peanut," "Fat Boy," and TIMOTHY WRIGHT transported the methamphetamine from California to NATHANIEL HILL, a/k/a "BJ" in Missouri and NATHANIEL HILL, a/k/a "BJ" distributed the obtained methamphetamine in the Eastern District of Missouri and elsewhere.

4. It was part of said money laundering conspiracy that upon distributing the

methamphetamine, NATHANIEL HILL, a/k/a "BJ" and others collected and caused to be collected proceeds derived from the sale of the methamphetamine.

5. It was part of said money laundering conspiracy that CANDACE HILL wired and transferred the proceeds of the methamphetamine sales to MAURICE LOVE, a/k/a "Reece," "Peanut," "Fat Boy," and TIMOTHY WRIGHT in California via MoneyGrams purchased at various outlets, including Wal-Mart stores in the Eastern District of Missouri, as payment for received and additional methamphetamine and for transportation of said methamphetamine.

6. It was part of said money laundering conspiracy that NATHANIEL HILL, a/k/a "BJ", to conceal and disguise the nature, location, source, ownership, and control of the proceeds, utilized others, including CANDACE HILL, to wire and transfer methamphetamine proceeds to MAURICE LOVE, a/k/a "Reece," "Peanut," "Fat Boy," and TIMOTHY WRIGHT in California via MoneyGrams purchased at various outlets in the Eastern District of Missouri.

7. It was part of said money laundering conspiracy that MAURICE LOVE, a/k/a "Reece," "Peanut," "Fat Boy," and TIMOTHY WRIGHT received and negotiated the MoneyGrams in California as payment for received and additional methamphetamine and for transportation of the methamphetamine.

8. It was part of said money laundering conspiracy that in some instances MAURICE LOVE, a/k/a "Reece," "Peanut," "Fat Boy," had others receive and negotiate the MoneyGrams on his behalf in order to conceal and disguise the nature, location, source, ownership, and control of the proceeds.

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

**COUNT IX**

**MONEY LAUNDERING**

The Grand Jury further charges that:

On or about October 22, 2017, in the Eastern District of Missouri, the defendant,

**CANDACE HILL**

did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, defendant sent a \$2,500 Moneygram from Missouri to TIMOTHY WRIGHT in California, which involved the proceeds of a specified unlawful activity, that is the unlawful distribution of methamphetamine, with the intent to promote the carrying on of specified unlawful activity, to wit: the unlawful distribution of methamphetamine, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i) and 2.

**COUNT X**

**MONEY LAUNDERING**

The Grand Jury further charges that:

On or about March 21, 2018, in the Eastern District of Missouri, the defendant,

**CANDACE HILL**

did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, defendant sent a \$2,400 Moneygram from Missouri to MAURICE LOVE, a/k/a "Reece," "Peanut," "Fat Boy" in California, which involved the proceeds of a specified unlawful activity, that is the unlawful distribution of methamphetamine, with the intent to promote the carrying on of specified unlawful activity, to wit: the unlawful distribution of methamphetamine, and that while conducting and attempting to conduct such financial

transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i) and 2.

**COUNT XI**

**MONEY LAUNDERING**

The Grand Jury further charges that:

On or about April 26, 2018, in the Eastern District of Missouri, the defendant,

**CANDACE HILL**

did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, defendant sent a \$2,500 Moneygram from Missouri to MAURICE LOVE, a/k/a "Reece," "Peanut," "Fat Boy" in California, which involved the proceeds of a specified unlawful activity, that is the unlawful distribution of methamphetamine, with the intent to promote the carrying on of specified unlawful activity, to wit: the unlawful distribution of methamphetamine, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i) and 2.

**COUNT XII**

**FELON IN POSSESSION OF A FIREARM**

The Grand Jury further charges that:

On or about June 13, 2018, in the Eastern District of Missouri, the defendant,

**EARL MURRAY, a/k/a "E,"**

having been convicted previously of a felony crime punishable by a term of imprisonment exceeding one year, did knowingly possess one or more firearms, which traveled in interstate or

foreign commerce during or prior to being in defendant's possession.

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

**COUNT XIII**

**POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE**

The Grand Jury further charges that:

On or about November 20, 2017, in the Eastern District of Missouri, the defendant

**JEFFREY WILL, a/k/a "Skinny"**

did knowingly and intentionally possess with the intent to distribute a mixture or substance in excess of 50 grams containing methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

**COUNT XIV**

**POSSESSION OF A FIREARM IN FURTHERANCE OF A  
DRUG TRAFFICKING CRIME**

The Grand Jury further charges that:

On or about June 13, 2018, in the Eastern District of Missouri, the defendant,

**MYRON COFFEE**

did knowingly possess one or more firearms in furtherance of a drug trafficking crime which may be prosecuted in a court of the United States, to wit: conspiracy to distribute and possess with intent to distribute methamphetamine, as charged in Count I.

In violation of Title 18, United States Code, Section 924(c)(1)(A) and Title 18, United States Code, Section 2.

**FORFEITURE ALLEGATION**

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense

in violation of Title 21, United States Code, Sections 841(a)(1) and 846 as set forth in Counts I through V, and XIII, the defendants shall forfeit to the United States of America any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offense; and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense.

2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to the offenses charged in Counts I through V, and XIII.

3. Pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Sections 922(g) or 924(c)(1), as set forth in Counts VI, VII, XII, and XIV, the defendants shall forfeit to the United States of America any firearm or ammunition involved in or used in said offense.

4. Pursuant to Title 18, United States Code, Sections 982(a), upon conviction of an offense in violation of Title 18, United States Code, Section 1956(a)(1), as set forth in Counts VIII through XI, the defendants shall forfeit to the United States of America any property, real or personal, involved in such offense, or any property traceable to such property.

5. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, involved in such offense, or property traceable to such property, for offenses charged in Counts VIII through XI.

6. Specific property subject to forfeiture includes, but is not limited to, the following:

- a) Approximately \$29,850.00 U.S. Currency, of which \$9,850.00 seized from a dresser drawer \$20,000.00 seized from a safe;
- b) Approximately \$40,460.00 U.S. Currency, of which \$380.00 was seized from

a wallet, \$2,680.00 from a box in a closet, and \$37,400.00 from a safe;

c) One 2007 BMW 7 Series Sedan4, VIN: WBAHL835X7DT09930; and

d) Miscellaneous Jewelry, more particularly described as:

- i. Three (3) silver in color necklaces;
- ii. Eight (8) gold in color bracelets ;
- iii. One (1) charm bracelet;
- iv. Two (2) gold earrings;
- v. Two (2) silver earrings;
- vi. One (1) gold watch;
- vii. Four (4) stud earrings;
- viii. One (1) gold ring;
- ix. Three (3) pendants; and
- x. Six (6) rings.

e) Miscellaneous Firearms and Ammunition, more particularly described as:

- i. Aero Precision, LLC, X15 AR-15, 2.23/5.56 caliber, S/N: X080495;
- ii. Taurus 9mm pistol, PT111, Ser. No: TLN28877;
- iii. Rohm .38 special revolver, Ser. No: 943327;
- iv. Glock .45 GAP pistol, 37, Ser. No: LAB543;
- v. Norinco 7.62 rifle, MAK 90 Sporter, Ser. No: 9491407;
- vi. Taurus .44 magnum revolver, Ser. No: VF954214;
- vii. Ekol Volga 9mm pistol, Ser. No: EVL-16110239;
- viii. Taurus .357 magnum revolver, Ser. No: KN83431;
- ix. Glock 26 9mm pistol, Ser. No: BEDH893;
- x. Cobra CA-380 .380 pistol, Ser. No: CP082160; and
- xi. Assorted magazines, gun bags, and ammunition.

7. If any of the property described above, as a result of any act or omission of the defendant(s):

- 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,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

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FOREPERSON

JEFFREY B. JENSEN  
United States Attorney

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CARRIE COSTANTIN, #35925MO  
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