

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION



UNITED STATES OF AMERICA

v.

DUSTIN CURRY, CLINT CARR,
HASSAN BARNES, FRASIEL
HUGHEY, LISA JONES, and
DARIUS TYLER,

Defendants.

Criminal No. _____
UNDER SEAL

United States Courts
Southern District of Texas
FILED

JUN 19 2018

David J. Bradley, Clerk of Court

18CR339

INDICTMENT

The Grand Jury charges:

GENERAL ALLEGATIONS

At all times material to this Indictment, unless otherwise specified:

1. The Controlled Substances Act ("CSA") governed the manufacture, distribution, and dispensing of controlled substances in the United States. With limited exceptions for medical professionals, the CSA made it unlawful for any person to knowingly or intentionally manufacture, distribute, or dispense a controlled substance or conspire to do so.

2. The CSA and its implementing regulations set forth which drugs and other substances are defined by law as "controlled substances," and assigned those controlled substances to one of five schedules (Schedule I, II, III, IV, or V) depending on their potential for abuse, likelihood of physical or psychological dependency, accepted medical use, and accepted safety for use under medical supervision.

3. A controlled substance assigned to "Schedule II" meant that the drug had a high potential for abuse, the drug had a currently accepted medical use in treatment in the United States, or the drug had a currently accepted medical use with severe restrictions.

4. Pursuant to the CSA and its implementing regulations:

a. Oxycodone was classified as a Schedule II controlled Substance. 21 C.F.R. § 1308.12(b)(1)(xiii). Oxycodone, sometimes prescribed under brand names including Oxycontin, Roxicodone, Xtampza ER, and Oxaydo, was used to treat severe pain. Oxycodone, as with other opioids, was highly addictive.

b. At all times relevant, and as of on or about October 6, 2014, Hydrocodone was classified as a Schedule II controlled substance. 21 C.F.R. § 1308.12(b)(1)(vi). Prior to on or about October 6, 2014, Hydrocodone was classified as a Schedule III controlled substance. Hydrocodone, sometimes prescribed under brand names including Norco, Lortab, and Vicodin, was used to treat severe pain. Hydrocodone, as with other opioids, was highly addictive.

5. Medical practitioners, such as pharmacists, physicians, and nurse practitioners, who were authorized to prescribe or distribute controlled substances by the jurisdiction in which they were licensed to practice were authorized under the CSA to prescribe, or otherwise distribute, controlled substances, if they were registered with the Attorney General of the United States. 21 U.S.C. § 822(b). Upon application by the practitioner, the Drug Enforcement Administration (DEA) assigned a unique registration number to each qualifying medical practitioner including physicians, pharmacies, and nurse practitioners.

6. Chapter 21 of the Code of Federal Regulations, Section 1306.04 governed the issuance of prescriptions and provided, among other things, that a prescription for a controlled substance “must be issued for a legitimate medical purpose by an individual practitioner acting in

the usual course of his professional practice.” Moreover, “[a]n order purporting to be a prescription issued not in the usual course of professional treatment . . . is not a prescription within the meaning and intent of [the CSA] and the person knowingly filling such a purported prescription, as well as the person issuing it, shall be subject to the penalties provided for violations of the provisions of law relating to controlled substances.”

7. Chapter 21 of the Code of Federal Regulations, Section 1306.06 governed the filling of prescriptions and provided, “A prescription for a controlled substance may only be filled by a pharmacist, acting in the usual course of his professional practice and either registered individually or employed in a registered pharmacy, a registered central fill pharmacy, or registered institutional practitioner.”

8. All prescriptions for controlled substances must be “dated as of, and signed on, the day when issued and shall bear the full name and address of the patient, the drug name, strength, dosage form, quantity prescribed, directions for use, and the name, address and registration number of the practitioner.” 21 C.F.R. § 1306.05(a). “The refilling of a prescription for a controlled substance listed in Schedule II is prohibited.” 21 C.F.R. § 1306.12(a); 21 U.S.C. § 829(a).

DEFENDANTS

9. Defendant **DUSTIN CURRY** was a managing partner of CC Pharmacy.
10. Defendant **CLINT CARR** was the owner and a managing partner of CC Pharmacy.
11. CC Pharmacy was a corporation registered to do business in the state of Texas, with a registered address of 2656 South Loop West, Suite 395, in Houston, TX 77054. CC Pharmacy

had associated pharmacies in Houston (“CC Houston”), Austin (“CC Austin”), and Round Rock (“CC Round Rock”).

12. Defendant **HASSAN BARNES** was licensed by the State of Texas as a pharmacist. **HASSAN BARNES** was employed as the pharmacist-in-charge (PIC) at CC Pharmacy 1, located in Houston, Texas (“CC Houston”).

13. CC Houston was a registered retail pharmacy, doing business at 2656 South Loop West, Suite 395, Houston, TX 77054.

14. CC Pharmacy 2, located in Austin, Texas (CC Austin), was a registered retail pharmacy, doing business at 8906 Wall St., Suite 305, Austin, TX 78754.

15. CC Pharmacy 3, located in Round Rock, Texas (CC Round Rock), was a registered retail pharmacy, doing business at 3000 Joe Dimaggio Blvd., Suite 57, Round Rock, TX 78665.

16. **Person A** was the operations manager of CC Houston and a pharmacy technician trainee.

17. Defendant **FRASIEL HUGHEY** was a supplier-level drug dealer operating in Houston and the East Texas region.

18. Defendant **LISA JONES** was a drug courier working for **FRASIEL HUGHEY**.

19. Defendant **DARIUS TYLER** was a drug courier, working for **D.E.**

COUNT ONE

**Conspiracy to Unlawfully Distribute and Dispense Controlled Substances
(21 U.S.C. § 846)**

20. Paragraphs 1 through 19 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

21. From in or around March 2016 through in or around November 2017, the exact dates being unknown to the Grand Jury, in the Houston Division of the Southern District of Texas and elsewhere, Defendants

**DUSTIN CURRY, CLINT CARR, HASSAN BARNES, FRASIEL HUGHEY,
LISA JONES, and DARIUS TYLER**

knowingly and intentionally combined, conspired, confederated, and agreed together and with each other, and with others known and unknown to the Grand Jury, to violate Title 21, United States Code, Section 841(a)(1), that is, to knowingly, intentionally, and unlawfully distribute and dispense, mixtures and substances containing a detectable amount of controlled substances, including Hydrocodone and Oxycodone, both Schedule II controlled substances, and other controlled substances, not with a legitimate medical purpose and outside the scope of professional practice.

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

Purpose of the Conspiracy

22. It was the purpose and object of the conspiracy for Defendants to unlawfully enrich themselves by, among other things: (a) distributing and dispensing controlled substances without a legitimate medical purpose and outside the scope of professional practice; (b) generating large profits from selling controlled substances; and (c) diverting the proceeds from those controlled substance sales for the personal use and benefit of Defendants and their coconspirators, known and unknown to the Grand Jury.

Manner and Means of the Conspiracy

The manner and means by which Defendants and their coconspirators sought to accomplish the purpose and object of the conspiracy included, among other things:

23. **CLINT CARR** obtained Texas Pharmacy Licenses from the Texas State Board of Pharmacy and DEA Registration for CC Houston, CC Austin, and CC Round Rock.

24. **DUSTIN CURRY, CLINT CARR, and Person A** managed and oversaw the operations of CC Pharmacy.

25. **HASSAN BARNES** maintained a Texas Pharmacist License with the Texas State Board of Pharmacy. With these credentials, **HASSAN BARNES** distributed and dispensed Schedule II–IV controlled substances from CC Houston, including Oxycodone, Hydrocodone, Carisoprodol, Alprazolam, Codeine, and, Hydromorphone, among others, not for a legitimate medical purpose and outside the scope of professional conduct.

26. “Couriers” or “drivers,” including **LISA JONES** and **DARIUS TYLER**, regularly picked up prescriptions from drug dealers, including **FRASIEL HUGHEY**.

27. **FRASIEL HUGHEY**, and other drug dealers, provided CC Houston with prescriptions that were not written or authorized by physicians.

28. **FRASIEL HUGHEY**, and other drug dealers, used stolen or forged prescriptions to purchase controlled substances at CC Houston.

29. The prescriptions were forged, stolen, written, and filled by Defendants and their co-conspirators, known and unknown to the grand jury, outside the scope of professional practice and not for a legitimate medical purpose.

30. “Couriers” or “drivers,” including **LISA JONES** and **DARIUS TYLER**, regularly dropped off prescriptions for controlled substances at CC Houston to be filled by **HASSAN BARNES**.

31. CC Pharmacy officers and employees, including **DUSTIN CURRY** and **Person A**, among others, communicated with “couriers” or “drivers,” including **LISA JONES** and **DARIUS TYLER**, about their orders.

32. “Couriers” or “drivers,” including **LISA JONES** and **DARIUS TYLER**, paid cash to CC Pharmacy officers and employees, including **DUSTIN CURRY** and **Person A**, in exchange for Schedule II-IV controlled substances, including Oxycodone, Hydrocodone, Carisoprodol, Alprazolam, Codeine, and Hydromorphone, among others, not for a legitimate medical purpose.

33. **DUSTIN CURRY** and **CLINT CARR** regularly picked up the cash proceeds at the end of the day.

34. “Couriers” or “drivers,” including **LISA JONES** and **DARIUS TYLER**, delivered the controlled substances to drug dealers, including **FRASIEL HUGHEY**.

35. **FRASIEL HUGHEY** and other drug dealers sold the controlled substances to customers who had not been prescribed the controlled substances by a physician.

36. **HASSAN BARNES** distributed and dispensed from CC Houston, among other controlled substances, Oxycodone and Hydrocodone, in exchange for cash, not for a legitimate medical purpose, and outside the course of professional practice.

37. **DUSTIN CURRY** and **CLINT CARR** split the proceeds from distributing and dispensing controlled substances without a legitimate medical purpose and outside the scope of professional practice.

All in violation of Title 21, United States Code, Sections 846 & 841(b)(1)(C).

COUNT TWO

**Unlawfully Distributing and Dispensing Controlled Substances and Aiding and Abetting
(21 U.S.C. § 841 & 18 U.S.C. § 2)**

38. Paragraphs 1 through 37 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

39. On or about the dates specified below, in the Houston Division of the Southern District of Texas, Defendants,

**DUSTIN CURRY, CLINT CARR, HASSAN BARNES,
FRASIEL HUGHEY, and LISA JONES,**

aiding and abetting each other and aided and abetted by others known and unknown to the Grand Jury, did unlawfully distribute and dispense, not for a legitimate medical purpose and outside the scope of professional practice, the controlled substances alleged below:

Count	On or about date	Controlled Substances	“Customer”
2	August 15, 2017	Oxycodone	RM

All in violation of Title 21, United States Code, Section 841(a), (b)(1)(C) & Title 18, United States Code, Section 2.

COUNT THREE

**Unlawfully Distributing and Dispensing Controlled Substances and Aiding and Abetting
(21 U.S.C. § 841 & 18 U.S.C. § 2)**

40. Paragraphs 1 through 37 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

41. On or about the dates specified below, in the Houston Division of the Southern District of Texas, Defendants,

DUSTIN CURRY, CLINT CARR, HASSAN BARNES, and FRASIEL HUGHEY,
aiding and abetting each other and aided and abetted by others known and unknown to the Grand Jury, did unlawfully distribute and dispense, not for a legitimate medical purpose and outside the scope of professional practice, the controlled substances alleged below:

Count	On or about date	Controlled Substance	“Customer”
3	August 17, 2017	Oxycodone	PERSON B

All in violation of Title 21, United States Code, Section 841(a), (b)(1)(C) & Title 18, United States Code, Section 2.

COUNTS FOUR & FIVE
Unlawfully Distributing and Dispensing Controlled Substances and Aiding and Abetting
(21. U.S.C. § 841 & 18 U.S.C. § 2)

42. Paragraphs 1 through 37 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

43. On or about the dates specified below, in the Houston Division of the Southern District of Texas, Defendants,

DUSTIN CURRY, CLINT CARR, HASSAN BARNES, and DARIUS TYLER,
aiding and abetting and aided and abetted by others known and unknown to the Grand Jury, did unlawfully distribute and dispense, not for a legitimate medical purpose and outside the scope of professional practice, the controlled substances alleged below:

Count	On or about date	Controlled Substances	“Customer”
4	July 26, 2017	Oxycodone Hydrocodone	DE
5	August 2, 2017	Oxyxodone Hydrocodone	DE

All in violation of Title 21, United States Code, Section 841(a), (b)(1)(C) & Title 18, United States Code, Section 2.

COUNT SIX
Conspiracy to Launder Monetary Instruments
(18 U.S.C. § 1956(h) – Money Laundering Promotion; Structuring)

44. Paragraphs 1 through 37 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

45. From on or about May 30, 2016, through June 30, 2017, in the Southern District of Texas and elsewhere, Defendants

DUSTIN CURRY and CLINT CARR,

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 in violation of Title 18, United States Code, Section 1956, to wit, knowingly conducting and attempting to conduct financial transactions affecting interstate or foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, Conspiracy to Distribute Controlled Substances:

- (a) with the intent to promote the carrying on of a specified unlawful activity, that is Conspiracy to Distribute Controlled Substances, 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 in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i); and
- (b) knowing that the transaction was designed in whole or in part to avoid a transaction reporting requirement under Federal law, 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, in violation of

Title 18, United States Code, Section 1956(a)(1)(B)(ii).

Purpose of the Conspiracy

46. It was the purpose and object of the conspiracy for Defendants to engage in financial transactions with their unlawful proceeds to, among other things: (a) avoid the reporting requirements of financial institutions so as to not alert regulatory and investigative authorities; and (b) purchase more controlled substances to be distributed and dispensed without a legitimate medical purpose and outside the scope of professional practice.

Manner and Means of the Conspiracy

The manner and means by which Defendants and their coconspirators sought to accomplish the purpose and object of the conspiracy included, among other things:

47. **DUSTIN CURRY** and **CLINT CARR** deposited the unlawful proceeds into the following six, among other, bank accounts held in the name of CC Pharmacy, CC Pharmacy 2, and CC Pharmacy 3, all of which were funded by cash deposits and/or transfers from other CC Pharmacy, CC Pharmacy 2, or CC Pharmacy 3 accounts:

Accounts Used to Purchase from Wholesalers		
CC Pharmacy	JPMorgan Chase Bank	*2082
CC Pharmacy	Bank of America	*1885
CC Pharmacy	Wells Fargo Bank	*8239
CC Pharmacy 2	JPMorgan Chase Bank	*8826
CC Pharmacy 2	Bank of America	*1898
CC Pharmacy 3	Bank of America	*7182

48. **DUSTIN CURRY** and **CLINT CARR** deposited the unlawful proceeds, in increments just below \$10,000, into accounts held in the name of CC Pharmacy, CC Pharmacy 2, and CC Pharmacy 3, such as:

Drug Transactions with Subsequent Structured Deposits 12/6/16 - 12/7/16					
RM		RM	12/6/16	Oxycodone, Hydrocodone, Carisoprodol, Alprazolam, and Tylenol #4	\$35,640.00
CC Pharmacy 2	JPM Chase Bank	8826	12/6/16	Cash Deposit	\$9,200.00
CC Pharmacy	Wells Fargo Bank	8239	12/6/16	Cash Deposit	\$9,340.00
CC Pharmacy 2	JPM Chase Bank	8826	12/7/16	Cash Deposit	\$9,260.00
CC Pharmacy 3	Wells Fargo Bank	8239	12/7/16	Cash Deposit	\$9,100.00

Drug Transactions with Subsequent Structured Deposits 1/10/17 - 1/11/17					
RM		RM	1/10/17	Oxycodone, Hydrocodone, Alprazolam, Promethazine-Codeine Syrup, and Dilaudid	\$22,760.00
CC Pharmacy 2	JPM Chase Bank	8826	1/10/17	Cash Deposit	\$9,500.00
CC Pharmacy	Wells Fargo Bank	8239	1/10/17	Cash Deposit	\$9,500.00
RM		RM	1/11/17	Oxycodone, Hydrocodone, Promethazine-Codeine Syrup, and Alprazolam	\$15,600.00
CC Pharmacy 2	JPM Chase Bank	8826	1/11/17	Cash Deposit	\$9,380.00
CC Pharmacy 2	JPM Chase Bank	8239	1/11/17	Cash Deposit	\$9,350.00

Drug Transactions with Subsequent Structured Deposits 1/19/17 - 1/20/17					
RM		RM	1/19/17	Oxycodone, Hydrocodone, Promethazine-Codeine Syrup, Alprazolam, and Tylenol #4	\$37,920.00
CC Pharmacy 2	JPM Chase Bank	8826	1/19/17	Cash Deposit	\$9,450.00
CC Pharmacy	Wells Fargo Bank	8239	1/19/17	Cash Deposit	\$9,500.00
CC Pharmacy 2	JPM Chase Bank	8239	1/20/17	Cash Deposit	\$1,680.00
CC Pharmacy	Wells Fargo Bank	8239	1/20/17	Cash Deposit	\$7,790.00
CC Pharmacy 2	JPM Chase Bank	8826	1/20/17	Cash Deposit	\$9,530.00

Drug Transactions with Subsequent Structured Deposits 2/2/17 - 2/7/17					
CW		CW	2/2/17	Oxycodone, Hydrocodone, Promethazine-Codeine Syrup, and Alprazolam	\$19,700.00
CC Pharmacy 2	JPM Chase Bank	8826	2/2/17	Cash Deposit	\$9,480.00
CC Pharmacy	Wells Fargo Bank	8239	2/2/17	Cash Deposit	\$9,610.00
RM		RM	2/3/17	Oxycodone, Hydrocodone, Promethazine-Codeine Syrup, Alprazolam, and Dilaudid	\$56,780.00
CC Pharmacy 2	JPM Chase Bank	8826	2/3/17	Cash Deposit	\$9,800.00
CC Pharmacy	Wells Fargo Bank	8239	2/3/17	Cash Deposit	\$9,700.00
CC Pharmacy 2	JPM Chase Bank	8826	2/6/17	Cash Deposit	\$9,500.00
CC Pharmacy 2	JPM Chase Bank	8826	2/6/17	Cash Deposit	\$9,500.00
CC Pharmacy	Wells Fargo Bank	8239	2/6/17	Cash Deposit	\$9,500.00
CC Pharmacy	Wells Fargo Bank	8239	2/6/17	Cash Deposit	\$9,500.00
CC Pharmacy 3	Bank of America	7182	2/6/17	Cash Deposit	\$9,500.00
RM		RM	2/7/17	Oxycodone, Hydrocodone, and Tylenol #4	\$21,500.00
CC Pharmacy 2	JPM Chase Bank	8826	2/7/17	Cash Deposit	\$9,300.00
CC Pharmacy	Wells Fargo Bank	8239	2/7/17	Cash Deposit	\$9,200.00

49. **DUSTIN CURRY** and **CLINT CARR** used unlawful proceeds in the accounts held in the name of CC Pharmacy, CC Pharmacy 2, and CC Pharmacy 3 to promote the conspiracy

and purchase controlled substances from the following prescription-drug wholesalers, among others:

**CC Pharmacy Purchases from Prescription Drug Wholesalers
(5/12/16 - 6/30/17) Sorted by Account**

Pharmaceutical Supplier	"CC Pharmacy" Account	Transactions	Debits
Auburn Pharmaceutical			
	JPM Chase *2082	30	\$38,576.99
	Wells Fargo Bank *8239	39	\$74,691.57
	BOA *1885	16	\$33,122.80
Cochran Wholesale Pharmacy			
	JPM Chase *2082	26	\$18,441.87
	Wells Fargo Bank *8239	14	\$21,495.01
	BOA *1885	10	\$18,446.25
DV Medical Supply			
	JPM Chase *2082	69	\$125,708.77
	Wells Fargo Bank *8239	45	\$107,245.70
	BOA *1885	19	\$47,404.47
Emed Medical Company			
	JPM Chase *2082	12	\$23,592.69
	Wells Fargo Bank *8239	19	\$35,693.89
	BOA *1885	9	\$13,375.40
Parmed Pharmaceuticals			
	JPM Chase *2082	30	\$14,027.14
	Wells Fargo Bank *8239	34	\$17,585.27
Qk Healthcare			
	JPM Chase *2082	82	\$55,178.64
	Wells Fargo Bank *8239	37	\$50,435.66
	BOA *1885	22	\$27,733.71
RMC Pharma Inc			
	JPM Chase *2082	14	\$40,664.44
	Wells Fargo Bank *8239	9	\$35,889.58
	BOA *1885	3	\$10,492.64
Wesley Pharmacal			
	JPM Chase *2082	18	\$18,148.70
	Wells Fargo Bank *8239	15	\$6,628.35
	BOA *1885	3	\$5,326.45

Pharmaceutical Supplier	"CC Pharmacy 2" Account	Transactions	Debits
Auburn Pharmaceutical			
	JPM Chase *8826	43	\$135,692.20
	BOA *1898	33	\$93,315.55
Cochran Wholesale Pharmacy			
	JPM Chase *8826	33	\$45,291.14
	BOA *1898	13	\$26,813.96
DV Medical Supply			
	JPM Chase *8826	58	\$122,247.27
	BOA *1898	27	\$49,358.00
Emed Medical Company			
	JPM Chase *8826	15	\$23,005.15
	BOA *1898	11	\$18,715.12
Parmed Pharmaceuticals			
	JPM Chase *8826	27	\$14,081.19
	BOA *1898	32	\$20,134.14
Qk Healthcare			
	JPM Chase *8826	32	\$32,684.58
	BOA *1898	15	\$10,868.43
Richie Pharmacal			
	JPM Chase *8826	16	\$10,429.35
	BOA *1898	19	\$12,009.16
RMC Pharma Inc			
	JPM Chase *8826	23	\$41,422.59
	BOA *1898	14	\$32,839.46
Tyler Pharmaceutical			
	BOA *1898	10	\$22,660.33
Wesley Pharmacal			
	JPM Chase *8826	10	\$6,619.61
	BOA *1898	7	\$10,641.50
Wholesale Rx			
	JPM Chase *8826	13	\$20,687.75
	BOA *1898	5	\$9,797.28

Pharmaceutical Supplier	"CC Pharmacy 3" Account	Transactions	Debits
Auburn Pharmaceutical			
	BOA *7182	9	\$18,413.75
Emed Medical Company			
	BOA *7182	4	\$12,188.73
Parmed Pharmaceuticals			
	BOA *7182	1	\$372.27
Pharmacy Vials And Supplies			
	BOA *7182	4	\$1,642.56
Total Pharmacy Supply			
	BOA *7182	5	\$1,502.60
Grand Total		1045	\$1,630,194.50

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

COUNTS SEVEN and EIGHT**Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity (18 U.S.C. § 1957 & 18 U.S.C. § 2)**

50. Paragraphs 1 through 37 and 47 through 49 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

51. On or about the dates set forth below, in the Southern District of Texas, and elsewhere, the defendants

DUSTIN CURRY and CLINT CARR,

each aiding and abetting the other, did knowingly engage and attempt to engage in a monetary transaction by, through, or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity, that is, Conspiracy to Distribute Controlled Substances, in violation of Title 21 United States Code, Section 846, as follows:

7	CC Pharmacy 2	JPMorgan Chase *8826	2/24/17	\$20,000	Russell & Smith Ford	Down payment on a Tan 2017 F250 with check no. 11
8	CC Pharmacy	Bank of America *1885	3/17/17	\$20,000	Sterling McCall Ford	Down payment on a White 2017 F250 with check no. 1002

All in violation of Title 18, United States Code, Section 1957 and 2.

NOTICE OF CRIMINAL FORFEITURE
(21 U.S.C. § 853(a))

52. Pursuant to Title 21, United States Code, Section 853(a), the United States of America gives notice to Defendants,

**DUSTIN CURRY, CLINT CARR, HASSAN BARNES,
FRASIEL HUGHEY, LISA JONES, and DARIUS TYLER,**

that upon conviction of an offense in violation of Title 21, United States Code, §§ 841 and 846, the following is subject to forfeiture:

- a. all property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation; and
- b. all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

NOTICE OF CRIMINAL FORFEITURE
(18 U.S.C. § 982(a)(1))

53. Pursuant to Title 18, United States Code, Section 982(a)(1), the United States of America gives notice to defendants

DUSTIN CURRY and CLINT CARR

that upon conviction of an offense in violation of Title 18, United States Code, Sections 1956 or 1957, they shall forfeit to the United States of America any property, real or personal, involved in such money laundering offenses, and any property traceable to such property.

PROPERTY SUBJECT TO FORFEITURE

54. Defendants are further notified that the property subject to forfeiture includes, but is not limited to, the following:

- a. \$4,524.50 seized from Bank of America Account *1898;
- b. \$10,370.98 seized from JP Morgan Chase Bank Account *2862;

- c. \$28,494.22 seized from Wells Fargo Account *1067;
- d. \$230,810.11 seized from Wells Fargo Account *0957;
- e. Financial account at Northwest Mutual Service Account *3023;
- f. Financial account at Northwest Mutual Investment Service Account *6772;
- g. Financial account at Northwest Mutual Investment Service Account, held as “CC Pharm”;
- h. Financial account at Northwest Mutual Investment Service Account *9134;
- i. \$345,424.09 in US Currency seized by law enforcement;
- j. \$3,670.00 in Cashier’s Checks seized by law enforcement;
- k. The following real property in Cyprus, Texas, together with all improvements, buildings, structures and appurtenances, which is legally described as follows:

LOT 18, BLOCK 1, OF BRIDGELAND HIDDEN CREEK SEC. 30, A SUBDIVISION IN HARRIS COUNTY, TEXAS, ACCORDING TO THE MAP OR PLAT THEREOF RECORDED IN FILM CODE NO. 671088, OF THE MAP RECORDS OF HARRIS COUNTY, TEXAS.

The record titleholders are Defendant Clint CARR and his wife.

- l. The following real property in Houston, Texas, together with all improvements, buildings, structures, and appurtenances, which is legally described as follows:

LOT 3, BLOCK 3, INWOOD FOREST SECTION 11, A SUBDIVISION IN HARRIS COUNTY, TEXAS, ACCORDING TO THE MAP/PLAT THEREOF RECORDED IN VOLUME 165, PAGE 97, MAP RECORDS OF HARRIS COUNTY, TEXAS.

The record titleholders are Defendant Frasiel HUGHEY and his ex-wife.

- m. White 2017 F250 Super Duty King Ranch Lariat, with VIN 1FT7W2BT2HEC61676, registered to CC Pharmacy.

n. Tan 2017 F250 Super Duty King Ranch Lariat, with VIN 1FT7W2BT8HEC52948, registered to CC Pharmacy.

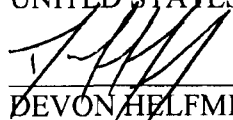
Money Judgment and Substitute Assets

The United States will seek the imposition of a money judgment against each defendant upon conviction.

Defendants are notified that in the event that one or more conditions listed in Title 21, United States Code, Section 853(p) exists, the United States will seek to forfeit any other property of each defendant up to the amount of the money judgment.

A TRUE BILL
Original Signature on File
FOREPERSON

RYAN K. PATRICK
UNITED STATES ATTORNEY



DEVON HELFMEYER
TRIAL ATTORNEY
FRAUD SECTION, CRIMINAL DIVISION
U.S. DEPARTMENT OF JUSTICE