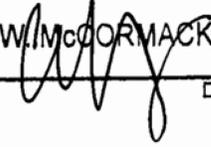


**FILED**  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS

JUL - 6 2017

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS

JAMES W. MCCORMACK, CLERK  
By:  DEP. CLERK

UNITED STATES OF AMERICA )  
 )  
v. )  
 )  
MICHAEL MCCLELLAN )  
 aka ROOSTER )  
CHAD THOMPSON )  
JEFF JARBOE )  
MELANIE HULSEY )  
JACKIE GALLARDO )  
LINDA FENNELL )  
RAYMOND ENGLERTH )  
LAUREN DEMPSEY )  
HEATHER MCDANIEL )

No. 4:17-cr-00 *184 BSM*

**FILED UNDER SEAL**

21 U.S.C. § 841(a)(1)

21 U.S.C. § 846

21 U.S.C. § 843(a)(3)

18 U.S.C. § 3013

18 U.S.C. § 3583

18 U.S.C. § 3571

**INDICTMENT**

THE GRAND JURY CHARGES:

**COUNT 1**

Beginning in or about October 2012, and continuing through on or about July 6, 2017, in the Eastern District of Arkansas and elsewhere,

MICHAEL MCCLELLAN,  
aka ROOSTER;  
CHAD THOMPSON  
JEFF JARBOE;  
MELANIE HULSEY;  
JACKIE GALLARDO;  
LINDA FENNELL;  
RAYMOND ENGLERTH;  
LAUREN DEMPSEY; and  
HEATHER MCDANIEL

did conspire with each other and others known and unknown to the grand jury to knowingly and intentionally possess with intent to distribute and to distribute Oxycodone, Hydrocodone, and Hydromorphone, Schedule II controlled substances, and other controlled substances without an

effective prescription in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C) and (b)(1)(E).

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

**COUNT 2**

On or about January 26, 2015, in the Eastern District of Arkansas, the defendant,

MICHAEL MCCLELLAN,

knowingly and intentionally obtained Hydromorphone, a Schedule II controlled substance, by misrepresentation, fraud, forgery, deception, and subterfuge, in violation of Title 21, United States Code, Section 843(a)(3).

**COUNT 3**

On or about March 9, 2015, in the Eastern District of Arkansas, the defendant,

MICHAEL MCCLELLAN,

knowingly and intentionally obtained Hydromorphone, a Schedule II controlled substance, by misrepresentation, fraud, forgery, deception, and subterfuge, in violation of Title 21, United States Code, Section 843(a)(3).

**COUNT 4**

On or about April 2, 2015, in the Eastern District of Arkansas, the defendant,

MICHAEL MCCLELLAN,

knowingly and intentionally obtained Hydromorphone, a Schedule II controlled substance, by misrepresentation, fraud, forgery, deception, and subterfuge, in violation of Title 21, United States Code, Section 843(a)(3).

**COUNT 5**

On or about April 13, 2015, in the Eastern District of Arkansas, the defendant,

MICHAEL MCCLELLAN,

knowingly and intentionally obtained Hydromorphone, a Schedule II controlled substance, by misrepresentation, fraud, forgery, deception, and subterfuge, in violation of Title 21, United States Code, Section 843(a)(3).

**COUNT 6**

On or about May 8, 2015, in the Eastern District of Arkansas, the defendant,

MICHAEL MCCLELLAN,

knowingly and intentionally obtained Hydromorphone, a Schedule II controlled substance, by misrepresentation, fraud, forgery, deception, and subterfuge, in violation of Title 21, United States Code, Section 843(a)(3).

**COUNT 7**

On or about May 16, 2015, in the Eastern District of Arkansas, the defendant,

MICHAEL MCCLELLAN,

knowingly and intentionally obtained Hydromorphone, a Schedule II controlled substance, by misrepresentation, fraud, forgery, deception, and subterfuge, in violation of Title 21, United States Code, Section 843(a)(3).

**COUNT 8**

On or about March 12, 2016, in the Eastern District of Arkansas, the defendant,

HEATHER MCDANIEL,

knowingly and intentionally obtained Hydromorphone, a Schedule II controlled substance, by misrepresentation, fraud, forgery, deception, and subterfuge, in violation of Title 21, United States Code, Section 843(a)(3).

**COUNT 9**

On or about August 29, 2016, in the Eastern District of Arkansas, the defendant,

LINDA FENNELL,

knowingly and intentionally obtained Hydrocodone, a Schedule II controlled substance, by misrepresentation, fraud, forgery, deception, and subterfuge, in violation of Title 21, United States Code, Section 843(a)(3).

**COUNT 10**

On or about October 7, 2014, in the Eastern District of Arkansas, the defendant,

CHAD THOMPSON,

knowingly and intentionally obtained Hydromorphone, a Schedule II controlled substance, by misrepresentation, fraud, forgery, deception, and subterfuge, in violation of Title 21, United States Code, Section 843(a)(3).

[End of text. Signature page to follow.]