

Section 802(32), with intent for human consumption, as provided for in Title 21, United States Code, Section 813, a violation of Title 21, United States Code, Section 841(a)(1).

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

COUNT TWO
[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)]

Beginning on or about November 1, 2011, and continuing until January 31, 2013, in the Northern District of Oklahoma, the defendants, **IQBAL MAKKAR**, a/k/a “Jack Singh”, a/k/a “Iqbal Singh Makkar”, and **GAURAV SEHGAL**, a/k/a “Ricky Sehgal”, did knowingly and intentionally possess with intent to distribute 1-(5-fluoro-pentyl)-1H-indol-3-yl (2,2,3,3-tetramethylcyclopropyl) methanone (5-fluoro-UR-144, XLR11), commonly known as “XLR11”, a controlled substance analogue as defined in Title 21, United States Code, Section 802(32), with intent for human consumption, as provided for in Title 21 United States Code, Section 813.

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

COUNT THREE
[21 U.S.C. § 856]

Beginning on or about November 1, 2011, and continuing until January 31, 2013, in the Northern District of Oklahoma, the defendants, **IQBAL MAKKAR**, a/k/a “Jack Singh”, a/k/a “Iqbal Singh Makkar”, and **GAURAV SEHGAL**, a/k/a “Ricky Sehgal”, did knowingly and intentionally maintain and use a place located at 24979 South 655 Road, Grove, Oklahoma, for the purpose of storing and distributing a controlled substance analogue, that is, 1-(5-fluoro-pentyl)-1H-indol-3-yl (2,2,3,3-tetramethylcyclopropyl) methanone (5-fluoro-UR-144, XLR11), commonly known as “XLR11”.

All in violation of Title 21, United States Code, Section 856(a)(1) and Title 18, United States Code, Section 2.

DRUG FORFEITURE ALLEGATION
[21 U.S.C. § 853(a)]

The allegations contained in Counts One through Three of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853(a).

Upon conviction of any of the drug offenses alleged in Counts One through Three of this Indictment, as part of their sentence, the defendants, **IQBAL MAKKAR**, a/k/a “Jack Singh”, a/k/a “Iqbal Singh Makkar”, and **GAURAV SEHGAL**, a/k/a “Ricky Sehgal”, shall forfeit to the United States any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate such offenses, including, but not limited to:

MONEY JUDGMENT:

A sum of money in an amount of at least \$1,279,184, representing proceeds obtained as a result of the drug offenses, for which the defendants are jointly and severally liable.

REAL PROPERTY:

1. Real property commonly known as 3502 SW Champagne Ave. Bentonville, Arkansas 72712, more particularly described follows, to-wit:

Lot 14, CHARDONNAY SUBDIVISION to the City of Bentonville, being a replat of Lot 2 of PATTON ADDITION to the City of Bentonville, Benton County, Arkansas, as shown on Plat Book P4 at Page 814.

2. Real property commonly known as Lots 20, 21, 22, 23, 24 and 25, CHARDONNAY SUBDIVISION, being a replat of Lot 2 of PATTON

ADDITION to the City of Bentonville, Benton County, Arkansas, as shown on Plat Record P4 at Page 814.

3. Real property commonly known as 3117 Buffalo Lane, Grove, Oklahoma 74344, more particularly described as follows, to-wit:

Lot 13, BUFFALO SHORES, Unit VI, a subdivision, according to the recorded plat thereof, Delaware County, Oklahoma.

4. Real property commonly known as 24979 S. 655 Rd. Grove, Oklahoma 74344, more particularly described as follows, to-wit:

A tract of land in the SE $\frac{1}{4}$ SW $\frac{1}{4}$ of Section 10, Township 25 North, Range 24 East, Delaware County, Oklahoma, more fully described as follows: Commencing at the Southeast corner of said SE $\frac{1}{4}$ SW $\frac{1}{4}$; thence N. 00° 15' W along the East line thereof, 171.4 feet to the point of beginning; thence N. 00° 15' W. 241.82 feet; thence N. 89° 53' W, 215.24 feet; thence S. 00° 15' E, 241.82 feet; thence S. 89° 53' E, 215.24 feet to the point of beginning, subject to a highway easement over and across the East 107.0 feet thereof, and subject to any and all easements.

5. Real property commonly known as 320 E. Main Street, Neosho, Missouri, more particularly described as follows, to-wit:

The South Half of Lots 9 and 10 in Block 1 of Neosho Proper Addition to the City of Neosho, Newton County, Missouri.

BUSINESS ASSETS:

All interest in and assets of Pari Petroleum USA, LLC, dba Gitter Done Station located at 24979 S. 655 Road, Grove, Oklahoma.

BANK AND FINANCIAL ACCOUNTS:

1. Proceeds of E-TRADE Account Number: xxxx8686, in the name of Surinder Kaur;
2. Proceeds of Arvest Bank Account Number xxxx4829, in the name of Surinder Kaur and or Iqbal Makkar;
3. Proceeds of Arvest Bank Account Number xxxx6909, in the name of Vajinder P. Singh;

4. Proceeds of Bank of Grove Checking Account Number: xxxx8594, in the name of Erin Sehgal;
5. Proceeds of First National Bank of Vinita, Grove Branch, Account Number: xxxx2152, in the name of Pari Petroleum USA LLC, dba Gitter Done Station; and
6. Proceeds of Bank of Grove Savings Account Number: xxxx2903, in the name of Erin Sehgal.

UNITED STATES CURRENCY:

\$15,836.36 in United States Currency, seized from The Gitter Done Station on January 31, 2013.

VEHICLES:

1. 2009 White, Range Rover, License Plate: Arkansas 207-RXF, VIN: SALS25449A193652; and
2. 2012 Ford F-150 King Ranch, License Plate: Oklahoma 676-JMU, VIN: 1FTFW1ETOCKD43076.

Pursuant to Title 21, United States Code, Section 853(p), the defendants shall forfeit substitute property, up to the value of the property described above if, by any act or omission of the defendants, the property described above, or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

All pursuant to Title 21, United States Code, Section 853(a).

COUNT FOUR
[18 U.S.C. §§ 1956(h) and 1957(b)(1)]

THE CONSPIRACY

Beginning at least as early as January 3, 2011, to on or about July 6, 2012, in the Northern District of Oklahoma and elsewhere, **IQBAL MAKKAR**, a/k/a “Jack Singh”, a/k/a “Iqbal Singh Makkar”, and **GAUREV SEHGAL**, a/k/a “Ricky Sehgal”, the defendants herein, knowingly and willfully combined, conspired, confederated, and agreed together, each with the other, and with others to commit offenses against the United States, in violation of Title 18, United States Code, Section 1957(a): To knowingly engage and attempt to engage in monetary transactions by, through and to a financial institution affecting interstate and foreign commerce in criminally derived property of a value greater than \$10,000, that is deposits of personal checks and negotiable instruments, such property having been derived from specified unlawful activities, that is, a drug conspiracy and the distributions of controlled substance analogues, violations of Title 21, United States Code, Sections 841(a)(1) and 846.

METHODS AND MEANS OF THE CONSPIRACY

The object of the conspiracy was to be accomplished and was accomplished as follows:

1. It was part of the conspiracy that Defendant **IQBAL MAKKAR**, hereinafter **MAKKAR**, and Defendant **GAUREV SEHGAL**, hereinafter **SEHGAL**,

would and did benefit from the illegal sales and distributions of controlled substance analogues.

2. It was further part of the conspiracy that **MAKKAR** and **SEHGAL** instructed others, both known and unknown to the Grand Jury, would and did collect the proceeds of the illegal sales and distribution of controlled substance analogues.

3. It was further part of the conspiracy that **MAKKAR** and **SEHGAL** controlled accounts at various financial institutions into which proceeds of the illegal sales and distributions of controlled substance analogues would be and were deposited.

4. It was further part of the conspiracy that funds from accounts at various financial institutions controlled by **MAKKAR** and **SEHGAL** would be and were used to promote additional distributions of controlled substance analogues.

5. It was further part of the conspiracy that **MAKKAR** and **SEHGAL** deposited the proceeds of the illegal distribution of controlled substance analogues into account number XX5701, a checking account at the Corner Stone Bank, a financial institution engaged in and the activities of which affected interstate commerce, on the dates, at the locations, and in the amounts stated in the table below:

Transaction Date	Financial Transaction Description	Location	Amount
03/30/2012	Checks Deposited	Southwest City, MO	\$11,930.00
04/05/2012	Checks Deposited	Southwest City, MO	\$12,792.00
04/13/2012	Checks Deposited	Southwest City, MO	\$10,520.00
05/09/2012	Checks Deposited	Southwest City, MO	\$13,591.00

All in violation of Title 18 United States Code, Sections 1956(h), 1957(a) and 1957(b)(1).

MONEY LAUNDERING FORFEITURE ALLEGATION
[18 U.S.C. § 982(a)(1)]

The allegations contained in Count Four of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 982(a)(1).

Upon conviction of money laundering conspiracy alleged in Count Four of this Indictment, as part of their sentence, the defendants, **IQBAL MAKKAR**, a/k/a “Jack Singh”, a/k/a “Iqbal Singh Makkar”, and **GAURAV SEHGAL**, a/k/a “Ricky Sehgal”, shall forfeit to the United States any property, real or personal, involved in such conspiracy, and any property traceable to such property, including, but not limited to:

MONEY JUDGMENT:

A sum of money in an amount of at least \$48,833, representing proceeds of such money laundering conspiracy for which the defendants are jointly and severally liable.

REAL PROPERTY:

1. Real property commonly known as 3502 SW Champagne Ave. Bentonville, Arkansas 72712, more particularly described follows, to-wit:

Lot 14, CHARDONNAY SUBDIVISION to the City of Bentonville, being a replat of Lot 2 of PATTON ADDITION to the City of Bentonville, Benton County, Arkansas, as shown on Plat Book P4 at Page 814.
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Lot 13, BUFFALO SHORES, Unit VI, a subdivision, according to the recorded plat thereof, Delaware County, Oklahoma.

4. Real property commonly known as 24979 S. 655 Rd. Grove, Oklahoma 74344, more particularly described as follows, to-wit:

A tract of land in the SE $\frac{1}{4}$ SW $\frac{1}{4}$ of Section 10, Township 25 North, Range 24 East, Delaware County, Oklahoma, more fully described as follows: Commencing at the Southeast corner of said SE $\frac{1}{4}$ SW $\frac{1}{4}$; thence N. 00° 15' W along the East line thereof, 171.4 feet to the point of beginning; thence N. 00° 15' W. 241.82 feet; thence N. 89° 53' W, 215.24 feet; thence S. 00° 15' E, 241.82 feet; thence S. 89° 53' E, 215.24 feet to the point of beginning, subject to a highway easement over and across the East 107.0 feet thereof, and subject to any and all easements.

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The South Half of Lots 9 and 10 in Block 1 of Neosho Proper Addition to the City of Neosho, Newton County, Missouri.

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5. Proceeds of First National Bank of Vinita, Grove Branch, Account Number: xxxx2152, in the name of Pari Petroleum USA LLC, dba Gitter Done Station; and

- 6. Proceeds of Bank of Grove Savings Account Number: xxxx2903, in the name of Erin Sehgal.

UNITED STATES CURRENCY:

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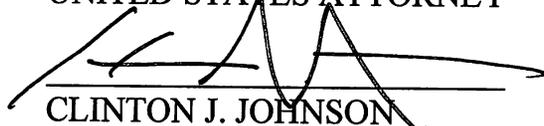
Pursuant to Title 21, United States Code, Section 853(p), as adopted by Title 18, United States Code, Section 982(b), the defendants shall forfeit substitute property, up to the value of the property described above if, by any act or omission of the defendants, the property described above, or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, including but not limited to:

VEHICLES:

- 1. 2009 White, Range Rover, License Plate: Arkansas 207-RXF, VIN: SALS25449A193652; and
- 2. 2012 Ford F-150 King Ranch, License Plate: Oklahoma 676-JMU, VIN: 1FTFW1ETOCKD43076.

All pursuant to Title 18, United States Code, Sections 982(a)(1).

DANNY C. WILLIAMS, SR.
UNITED STATES ATTORNEY


CLINTON J. JOHNSON
Assistant United States Attorney

A TRUE BILL

/s/Grand Jury Foreperson
Grand Jury Foreperson