

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 8:19 cr 420 T 30 c p T

HEIDI ELIZABETH KALOUS

21 U.S.C. § 846

21 U.S.C. § 841

INDICTMENT

The Grand Jury charges:

COUNT ONE

Beginning on an unknown date, but not later than on or about June 5, 2019, and continuing through on or about June 28, 2019, in the Middle District of Florida, the defendant,

HEIDI ELIZABETH KALOUS

did knowingly, willfully, and intentionally conspire with other persons, both known and unknown to the Grand Jury, to distribute, and possess with intent to distribute, a controlled substance, the use of which resulted in serious bodily injury and death to N.R. from such substance. The violation involved a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance and a mixture and substance containing a detectable amount of heroin, a Scheduled I controlled substance.

All in violation of 21 U.S.C. §§ 846 and 841(b)(1)(C).

COUNT TWO

On or about June 5, 2019, in the Middle District of Florida, the defendant,

HEIDI ELIZABETH KALOUS

did knowingly and intentionally possess with intent to distribute and did distribute a controlled substance, the use of which resulted in serious bodily injury and death to N.R. from such substance, which violation involved a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of heroin, a Scheduled I controlled substance.

All in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C), and 18 U.S.C.

§ 2.

COUNT THREE

On or about June 19, 2019, in the Middle District of Florida, the defendant,

HEIDI ELIZABETH KALOUS

did knowingly and intentionally possess with intent to distribute and did distribute a controlled substance, which violation involved a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

All in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C), and 18 U.S.C. § 2.

COUNT FOUR

On or about June 27, 2019, in the Middle District of Florida, the defendant,

HEIDI ELIZABETH KALOUS

did knowingly and intentionally possess with intent to distribute and did distribute a controlled substance, which violation involved a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of acetyl fentanyl, a Scheduled I controlled substance.

All in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C), and 18 U.S.C. § 2.

COUNT FIVE

Between on or about June 27, 2019, through on or about June 28, 2019, in the Middle District of Florida, the defendant,

HEIDI ELIZABETH KALOUS

did knowingly and intentionally possess with intent to distribute and did distribute a controlled substance, which violation involved a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled

substance, and a mixture and substance containing a detectable amount of heroin, a Scheduled I controlled substance.

All in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C), and 18 U.S.C.

§ 2.

FORFEITURES

1. The allegations contained in Counts One through Five of the Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture under 21 U.S.C. § 853.

2. Upon conviction of the violations alleged in this Indictment, punishable by imprisonment for more than one year, the defendant,

HEIDI ELIZABETH KALOUS

shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any:


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

3. If any of the property described above, 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 comingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property under 21 U.S.C. § 853(p).


A TRUE BILL,



Foreperson

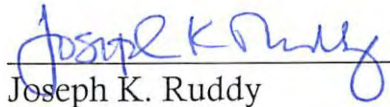
MARIA CHAPA LOPEZ
United States Attorney

By:



Diego F. Novaes
Assistant United States Attorney

By:



Joseph K. Ruddy
Assistant United States Attorney
Chief, Transnational Organized Crime Section

No.

UNITED STATES DISTRICT COURT
Middle District of Florida
Tampa Division

THE UNITED STATES OF AMERICA

vs.

HEIDI ELIZABETH KALOUS

INDICTMENT

Violations: 21 U.S.C. §§ 841 and 846

A true bill,



Foreperson

Filed in open court this 19th day

of September 2019.

Clerk

Bail \$ _____

FILED
SEP 19 2019
CLERK