

FILED

Jul 21 2021

3:31 pm

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY s/ dominic DEPUTY

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5 UNITED STATES DISTRICT COURT
6 SOUTHERN DISTRICT OF CALIFORNIA

7 UNITED STATES OF AMERICA,
8 Plaintiff,

9 v.

10 LINDSAY RENEE HENNING, ET. AL,
11 Defendants.

Case No. '21 CR2153 CAB

NOTICE OF RELATED CASE

12
13 TO THE CLERK OF THE COURT:

14 Please take notice that the above entitled case is related to
15 United States of America v. Garrett Carl Tuggle, Case No. 21CR1804-
16 CAB, pursuant to Local Rule 57.2.1, Related Cases. The United States
17 Attorney certifies the cases are related for the following reason(s):

18 _____ (1) All of the defendants named in each of the cases are
19 the same and none of the cases include defendants not
20 named in any of the other cases.

21 X (2) Prosecution against different defendants arises from:

22 _____ (a) A common wiretap

23 X (b) A common search warrant

24 X (c) Activities that are part of the same alleged
25 criminal event or transaction; that is, the
26 cases involved substantially the same facts
27 and the same questions of law.

28 DATED: July 21, 2021.



RANDY S. GROSSMAN
Acting United States Attorney

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CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY s/ dominicf DEPUTY

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5 UNITED STATES DISTRICT COURT
6 SOUTHERN DISTRICT OF CALIFORNIA

7 December 2020 Grand Jury

8 UNITED STATES OF AMERICA,
9
10 Plaintiff,

11 v.

12 LINDSAY RENEE HENNING (1),
13 GARRETT CARL TUGGLE (2),
14 SALVATORE COMPILATI (3),
15 RYAN DAVID GENETTI (4),
16 JUAN LANDON (5),
17
18 Defendants.

Case No. '21 CR2153 CAB

I N D I C T M E N T

Title 21, U.S.C., Secs. 841(a)(1) and 846 - Conspiracy to Distribute MDMA and LSD; Title 18, U.S.C., Sec. 1349 - Conspiracy; Title 18, U.S.C., Sec. 1028A - Aggravated Identity Theft; Title 18, U.S.C., Sec. 2 - Aiding and Abetting; Title 21, U.S.C., Sec. 841(a)(1) - Possession with Intent to Distribute Methamphetamine, Cocaine and Heroin; Title 21, U.S.C., Sec. 853, Title 18, U.S.C., Sec. 981(a)(1)(C), and Title 28, U.S.C., Sec 2461(c) - Criminal Forfeiture

19 The grand jury charges:

20 Count 1

21 Beginning on a date unknown to the grand jury and continuing up to
22 and including September 8, 2020, within the Southern District of
23 California, and elsewhere, defendants LINDSAY RENEE HENNING, GARRETT
24 CARL TUGGLE, and JUAN LANDON did knowingly and intentionally conspire
25 with each other and with other persons known and unknown to the grand
26 jury to distribute Methylenedioxymethamphetamine (also known as MDMA),
27 a Schedule I Controlled Substance; in violation of Title 21, United
28 States Code, Sections 841(a)(1) and 846.

SW:CLS:nlv(3):San Diego:7/21/21

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Count 5

On or about May 24, 2021, within the Southern District of California, and elsewhere, defendant GARRETT CARL TUGGLE, did knowingly possess with intent to distribute 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance; in violation of Title 21, United States Code, Section 841(a)(1).

Count 6

On or about May 24, 2021, within the Southern District of California, and elsewhere, defendant GARRETT CARL TUGGLE, did knowingly possess with intent to distribute cocaine, a Schedule II Controlled Substance; in violation of Title 21, United States Code, Section 841(a)(1).

Count 7

On or about May 24, 2021, within the Southern District of California, and elsewhere, defendant GARRETT CARL TUGGLE, did knowingly possess with intent to distribute heroin, a Schedule I Controlled Substance; in violation of Title 21, United States Code, Section 841(a)(1).

FORFEITURE ALLEGATIONS

The allegations contained in Counts 1 through 3 and 5 through 7 are realleged herein for purposes of alleging forfeiture to the United States pursuant to Title 21, United States Code, Section 853, Title 18 United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

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1 Upon conviction of one or more of the felony offenses set forth in
2 Counts 1, 2, 5, 6 and 7, which offenses are subject to imprisonment for
3 greater than one year, defendants LINDSAY RENEE HENNING, GARRETT CARL
4 TUGGLE, SALVATORE COMPILATI, RYAN DAVID GENETTI, and JUAN LANDON, shall
5 forfeit to the United States any and all property constituting, or
6 derived from, any proceeds that the defendants obtained, directly or
7 indirectly, as the result of the offense, and any and all property used
8 or intended to be used in any manner or part to commit and to facilitate
9 the commission of the violations alleged in Counts 1, 2, 5, 6, and 7 of
10 this indictment. The property to be forfeited includes, but is not
11 limited to: cash; bitcoin and cryptocurrency wallets; a 2006 Mercedes
12 Benz E55 Sedan (VIN WDBUF76J16A872178) registered to defendant GARRETT
13 CARL TUGGLE; a white 2013 Mercedes-Benz ML63 SUV bearing California
14 license plate 8UVU579 registered to defendant GARRETT CARL TUGGLE; a
15 white and blue 2020 Husqvarna Motorcycle bearing California license
16 plate 24Y3627 registered to defendant GARRETT CARL TUGGLE; a green/gray
17 2006 Mercedes Benz SL55 bearing California license plate 6SNY041
18 registered to defendant GARRETT CARL TUGGLE; a Gray 2006 Mercedes Benz
19 E55 (VIN WDBUF76J16A872178); A 2020 Dodge Ram Pickup Truck (VIN
20 1C6SRFFT5LN163759); and a 2015 Airstream Flying Cloud M-23D Trailer (VIN
21 1STB9AG25FJ531744).

22 Upon conviction of the offense alleged in Count 3 of this Indictment
23 and pursuant to Title 18, United States Code, Section 981(a)(1)(C),
24 Title 28, United States Code, Section 2461 (c), defendants LINDSAY RENEE
25 HENNING, GARRETT CARL TUGGLE, SALVATORE COMPILATI, and RYAN DAVID
26 GENETTI, shall forfeit to the United States any property, real and
27 personal, which constitutes and is derived from proceeds traceable to
28 the offense, and any property traceable to such property. The property

1 to be forfeited includes, but is not limited to: cash; bitcoin and
2 cryptocurrency wallets; a 2006 Mercedes Benz E55 Sedan (VIN
3 WDBUF76J16A872178) registered to defendant GARRETT CARL TUGGLE; A 2020
4 Dodge Ram Pickup Truck (VIN 1C6SRFFT5LN163759); and a 2015 Airstream
5 Flying Cloud M-23D Trailer (VIN 1STB9AG25FJ531744).

6 If any of the above-described forfeited property, as a result of
7 any act or omission of defendants cannot be located upon the exercise
8 of due diligence; has been transferred or sold to, or deposited with, a
9 third person; has been placed beyond the jurisdiction of the Court; has
10 been substantially diminished in value; or has been commingled with
11 other property which cannot be subdivided without difficulty, it is the
12 intent of the United States, pursuant to Title 21, United States Code,
13 Section 853(p), and Title 28, United States Code, Section 2461(c), to
14 seek forfeiture of any other property of the defendants up to the value
15 of the property described above subject to forfeiture.

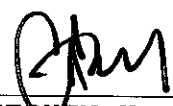
16 All pursuant to Title 21, United States Code, Section 853, Title 18,
17 United States Code, Section 981(a)(1)(C), and Title 28, United States
18 Code, Section 2461(c).

19 DATED: July 21, 2021.

20 A TRUE BILL:

21 
22 _____
23 Foreperson

23 RANDY S. GROSSMAN
24 Acting United States Attorney

25 By: 
26 _____
27 STEPHEN H. WONG
28 COURTNEY STRANGE
Assistant U.S. Attorneys

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CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY s/ dominic DEPUTY

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4 UNITED STATES DISTRICT COURT
5 SOUTHERN DISTRICT OF CALIFORNIA

6 December 2020 Grand Jury

7 UNITED STATES OF AMERICA,
8
9 Plaintiff,

10 v.

11 KONRAD PIEKOS (1),
12 MATTHEW GEORGE LOMBARDO (2),
13 RYAN DAVID GENETTI (3),
14 DOBRILA "BEBE" MILOSAVLJEVIC (4),
15 Defendants.

Case No. '21 CR2154 CAB

I N D I C T M E N T

Title 18, U.S.C., Sec. 1349 -
Conspiracy to Commit Wire Fraud;
Title 18, U.S.C., and Sec. 1028A -
Aggravated Identity Theft;
Title 18, U.S.C., Sec. 2 - Aiding
and Abetting; Title 42 U.S.C.
Sec. 1320d-6-Wrongful Disclosure
of Individually Identifiable
Health Information; Title 18,
U.S.C., Sec. 981(a)(1)(C) and
Title 28, U.S.C., Sec 2461(c) -
Criminal Forfeiture.

16 The grand jury charges:

17
18 Count 1

19 Beginning on a date unknown to the grand jury and continuing up to
20 and including October 22, 2020, within Southern District of California
21 and elsewhere, defendants KONRAD PIEKOS, MATTHEW GEORGE LOMBARDO, RYAN
22 DAVID GENETTI, and DOBRILA "BEBE" MILOSAVLJEVIC and others known and
23 unknown, did knowingly and intentionally conspire to devise and execute
24 a scheme and artifice to defraud and to obtain money and property by
25 means of materially false and fraudulent pretenses, representations, and
26 promises, and to cause the interstate transmission of writings, signs,
27 signals, and sounds for the purpose of executing that scheme, in
28 violation of Title 18, United States Code, Section 1349.

SW:APW:nlv(2):San Diego:7/21/21

1 individually identifiable health information related to an individual,
2 maintained by an entity covered by HIPAA privacy regulations as described
3 in 42 U.S.C. § 1320d-9(b)(3), with the intent to use that information
4 for personal gain; all in violation of Title 42, United States Code,
5 Section 1320d-6, a felony.

6 **FORFEITURE ALLEGATIONS**

7 The allegation contained in Count 1 is realleged herein for purposes
8 of alleging forfeiture to the United States pursuant to Title 18 United
9 States Code, Section 981(a)(1)(C), and Title 28, United States Code,
10 Section 2461(c).

11 Upon conviction of the offense set forth in Count 1, and pursuant
12 to Title 18, United States Code, Section 981(a)(1)(C) and Title 28,
13 United States Code, Section 2461(c), defendants KONRAD PIEKOS, MATTHEW
14 GEORGE LOMBARDO, RYAN DAVID GENETTI, and DOBRILA "BeBe" MILOSAVLJEVIC
15 forfeit to the United States any and all property constituting, or
16 derived from, any proceeds that the defendants obtained, directly or
17 indirectly, as the result of the offense, and any and all property used
18 or intended to be used in any manner or part to commit and to facilitate
19 the commission of the violation alleged in Count 1.

20 If any of the above-described forfeited property, as a result of
21 any act or omission of defendants cannot be located upon the exercise
22 of due diligence; has been transferred or sold to, or deposited with, a
23 third person; has been placed beyond the jurisdiction of the Court; has
24 been substantially diminished in value; or has been commingled with
25 other property which cannot be subdivided without difficulty,

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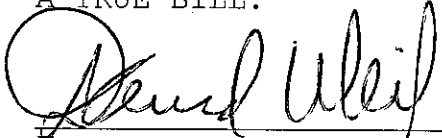
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2 it is the intent of the United States, pursuant to Title 28, United
3 States Code, Section 2461(c), to seek forfeiture of any other property
4 of the defendants up to the value of the property described above subject
5 to forfeiture.

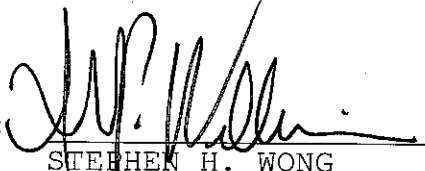
6 All pursuant to Title 18, United States Code, Sections 981(a)(1)(C), and
7 Title 28, United States Code, Section 2461(c).

8 DATED: July 21, 2021.

9 A TRUE BILL:

10 
11 _____
12 Foreperson

12 RANDY S. GROSSMAN
13 Acting United States Attorney

14 
15 By: _____
16 STEPHEN H. WONG
17 ALICIA P. WILLIAMS
18 Assistant U.S. Attorneys

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