

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION

**Sealed**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**(01) RAJA AMER NAWAZ,**  
**a/k/a "Rex"**  
[DOB: 6/12/74]

**(02) SHEILA MARIE NAWAZ,**  
[DOB: 10/25/76]

**(03) MICHAEL JAMES BUTLER,**  
[DOB: 12/27/76]

**(04) CURTIS WHAYNE GONZALES,**  
**a/k/a "Curtis Wayne"**  
[DOB: 8/26/60]

**(05) ALEKSANDR POLYANSKIY,**  
[DOB: 4/22/92]

**(06) JASON LEE HOUSTON,**  
[DOB: 12/23/79]

**(07) SHAWN MICHAEL BROWNING,**  
[DOB: 9/12/90]

**(08) TIMOTHY CHRISTOPHER  
SANDFORT,**  
[DOB: 2/25/86]

**(09) JOSHUA ADAM SHEETS,**  
[DOB: 2/8/86]

**(10) BRANDON DEREK RADER,**  
[DOB: 5/24/84]

**(11) DARA LEANNE SHIRLEY,**  
[DOB: 4/20/86]

No. 16-040~~21~~-01/13-CR-C-SRB

**COUNT 1**

18 U.S.C. § 1349  
NMT 20 Years Imprisonment  
NMT \$250,000 Fine  
NMT 3 Years Supervised Release  
Class C Felony

**COUNT 2**

21 U.S.C. §§ 846, 802(32)(A), and 813  
NMT 20 Years Imprisonment  
NMT \$1,000,000 Fine  
NLT 3 Years Supervised Release  
Class C Felony

**COUNT 3**

21 U.S.C. § 846  
NMT 20 Years Imprisonment  
NMT \$1,000,000 Fine  
NLT 3 Years Supervised Release  
Class C Felony

**COUNTS 4 through 7**

21 U.S.C. § 841(a)(1)  
NMT 20 Years Imprisonment  
NMT \$1,000,000 Fine  
NLT 3 Years Supervised Release  
Class C Felony

**COUNTS 8 through 11**

21 U.S.C. § 856(a)(1)  
NMT 20 Years Imprisonment  
NMT \$500,000 Fine  
NMT 3 Years Supervised Release  
Class C Felony

**ORIGINAL**

**(12) CASEY DEWAYNE MILLER,**  
[DOB: 12/20/83]

and

**(13) BILLIE L. BRUCE,**  
[DOB: 11/30/79]

Defendants.

**Defendants/Counts:**

- (01) R. Nawaz: 1-3, and 12-14.**
- (02) S. Nawaz: 1-3**
- (03) Butler: 1-3, and 12.**
- (04) Gonzales: 1-3, and 12.**
- (05) Polyanskiy: 1-3.**
- (06) Houston: 1-3, 6-10, and 12-14.**
- (07) Browning: 1-5, 11, and 12.**
- (08) Sandfort: 1-3, 6-10, and 12-14.**
- (09) Sheets: 1-5, 11, and 12.**
- (10) Rader: 1-3, 6-10, and 12-14.**
- (11) Shirley: 1-3, and 12-14.**
- (12) Miller: 1-3, 6, and 7.**
- (13) Bruce: 1-5.**

**COUNT 12**

18 U.S.C. § 1956(h)  
NMT 20 Years Imprisonment  
NMT \$500,000 Fine  
NMT 3 Years Supervised Release  
Class C Felony

**COUNTS 13 and 14**

18 U.S.C. § 1957(a)  
NMT 10 Years Imprisonment  
NMT \$500,000 Fine  
NMT 3 Years Supervised Release  
Class C Felony

**FORFEITURE ALLEGATION 1**

18 U.S.C. § 981(a)(1)(C) and  
28 U.S.C. § 2461(c)  
Criminal Forfeiture

**FORFEITURE ALLEGATION 2**

21 U.S.C. § 853  
Criminal Forfeiture

**FORFEITURE ALLEGATION 3**

18 U.S.C. § 982(a)(1)  
Criminal Forfeiture

\$100 Special Assessment (Each Count)

**INDICTMENT**

**THE GRAND JURY CHARGES THAT:**

**Introduction and Background**

At all times relevant to this Indictment:

1. **RAJA AMER NAWAZ** a/k/a “Rex” (hereinafter **R.A. NAWAZ**), owned and controlled MOJO Distribution, LLC, Aromatic Novelties, Inc., and Top Notch Novelties, Inc., all organized or incorporated in the State of Nevada as distributors of “novelty items.” MOJO Distribution, Aromatic Novelties, and Top Notch Novelties used addresses in Folsom,

California, Rancho Cordova, California, Sacramento, California, and Reno, Nevada, to send FedEx packages containing synthetic cannabinoids to wholesale customers at various locations in the United States. Among others, **MICHAEL JAMES BUTLER**, **CURTIS WHAYNE GONZALES** a/k/a “Curtis Wayne,” and **ALEKSANDR POLYANSKIY** assisted **R.A. NAWAZ** in the distribution of synthetic cannabinoids by fulfilling orders placed by customers in the Western District of Missouri and elsewhere. **BUTLER** managed MOJO Distribution with **R.A. NAWAZ**.

2. **SHEILA MARIE NAWAZ** (hereinafter **S.M. NAWAZ**) was married to **R.A. NAWAZ**. **S.M. NAWAZ** was the President of Ecomm Organix, Inc., which was incorporated in the State of California as a distributor of “novelty products.” Ecomm Organix used a business address in Orangevale, California. Ecomm Organix purchased synthetic cannabinoids from MOJO Distribution and then distributed those synthetic cannabinoids to retail customers throughout the United States, including the Western District of Missouri. Ecomm Organix and MOJO Distribution shared websites and telephone numbers used to market synthetic cannabinoids. Employees of MOJO Distribution were paid by Ecomm Organix. Ecomm Organix employees worked for MOJO Distribution.

3. During 2013, **BUTLER** and **GONZALES** were paid wages by Ecomm Organix. During that time **BUTLER** and **GONZALES** performed work for MOJO Distribution. While receiving compensation from Ecomm Organix and working for MOJO Distribution, **BUTLER** and **GONZALES**, established and controlled Butler-Whayne Industries, LLC. Butler-Whayne Industries was organized in the State of California for the purpose of selling Xboxes, Playstations, games and accessories. In fact, Butler-Whayne Industries used an address in Sacramento, California, to send UPS packages containing synthetic cannabinoids to wholesale

customers at various locations in the United States. These included the following loations in Callaway County, Missouri: Inscentives Resale in Auxvasse and Fulton and Essentials/S&J Tobacco in Holts Summit, Missouri.

4. **ALEKSANDR POLYANSKIY** worked for **R.A. NAWAZ** at MOJO Distribution, Aromatic Novelties, and Top Notch Novelties. In January 2015, **ALEKSANDR POLYANSKIY** established and controlled ANOP, Inc., also known as A-1 Distribution, which was incorporated in the State of Nevada as a distributor of novelty items. R. NAWAZ was a silent partner in this business. ANOP used an address in Sparks, Nevada, to send UPS packages containing synthetic cannabinoids to customers in the Western District of Missouri, and at various other locations in the United States.

5. **JASON LEE HOUSTON, TIMOTHY CHRISTOPHER SANDFORT, BRANDON DEREK RADER, DARA LEANNE SHIRLEY** and **CASEY DEWAYNE MILLER** controlled and operated First Stop Last Stop Pawn and Aromatherapy, Inscentives Resale and Inscentives Auto. First Stop Last Stop Pawn and Aromatherapy represented itself as a “pawn shop” and “potpourri store.” Inscentives Resale was represented to be a “buy, sell, and trade business.” Inscentives Auto held a Missouri Motor Vehicle Dealer’s License. At various times, First Stop Last Stop Pawn and Aromatherapy, Inscentives Resale, and Inscentives Auto all purchased synthetic cannabinoids from **R.A. NAWAZ, BUTLER, GONZALES, POLYANSKIY**, and others. Inscentives Resale sold synthetic cannabinoids from locations in Auxvasse and Fulton, Callaway County, Missouri. First Stop Last Stop Pawn and Aromatherapy and Inscentives Auto did not maintain retail locations for the sale of synthetic cannabinoids.

6. **SHAWN MICHAEL BROWNING, JOSHUA ADAM SHEETS, BILLIE L. BRUCE** and others, controlled and operated Essentials Buy, Sell and Trade, which was also

known as Essentials, Essentials Resale, and S&J Tobacco, which was also known as J&L Tobacco. Essentials Buy, Sell and Trade and S&J Tobacco purchased synthetic cannabinoids from **R.A. NAWAZ, POLYANSKIY**, and others, and sold synthetic cannabinoids from locations in Holts Summit, Callaway County, Missouri.

7. **HOUSTON, SANDFORT, RADER, SHIRLEY, MILLER, BROWNING, SHEETS, BRUCE** and others jointly obtained packages of synthetic cannabinoids from **R.A. NAWAZ, POLYANSKIY, BUTLER, GONZALES** and others, and periodically supplied each other with packages of synthetic cannabinoids for resale.

8. The contents of these various packages contained the following synthetic cannabinoids: N-(1-Adamantyl)-1-(5-fluoropentyl)-1H-Indazole-3-carboxamide, also known as 5F-APINACA (hereinafter 5F-APINACA), 1-(5-fluoropentyl)-1H-indole-3-carboxylic acid 8-quinolinyl ester, also known as 5F-PB-22 (hereinafter 5F-PB-22), 1-Pentyl-1H-indole-3-carboxylic acid 8-quinolinyl ester, also known as PB-22 (hereinafter PB-22), N-(1-Amino-3-methyl-1-oxobutan-2-yl)-1-pentyl-1H-indazole-3-carboxamide, also known as AB-PINACA (hereinafter AB-PINACA), 1-(5-Fluoropentyl)-3-(2,2,3,3-tetramethylcyclopropyl) indole, also known as XLR-11 (hereinafter XLR-11), Quinolin-8-yl 1-(4-fluorobenzyl)-1H-indole-3-carboxylate, also known as FUB-PB-22 (hereinafter FUB-PB-22), (1-(5-Fluoropentyl)-1H-benzo[d]imidazol-2-yl) (naphthalen-1-yl)methanone, also known as FUBIMINA (hereinafter FUBIMINA), Naphthalen-1-yl 1-[5-fluoropentyl]-1H-indole-3-carboxylate, also known as NM-2201 (hereinafter NM-2201), Methyl 2-(1-(5-fluoropentyl)-1H-indazole-3-carboxamido)-3-methylbutanoate, also known as 5F-AMB (hereinafter 5F-AMB), 1-Pentyl-3-(2,2,3,3-tetramethylcyclopropyl) indole, also known as UR-144 (hereinafter UR-144), (1-[5-Fluoropentyl]-1H-indazol-3-yl) (naphthalene-1-yl)methanone, also known as THJ-2201

(hereinafter THJ-2201), N-(1-Amino-3-methyl-1-oxobutan-2-yl)-1-(4-fluorobenzyl)-1H-indazole-3-carboxamide, also known as, AB-FUBINACA (hereinafter AB-FUBINACA), 1-(4-Fluorobenzyl)-1H-indol-3-yl)(2,2,3,3-tetramethylcyclopropyl)methanone, also known as FUB-144 (hereinafter FUB-144), and N-(1-Amino-3-methyl-1-oxobutan-2-yl)-1-(cyclohexylmethyl)-1H-indazole-3-carboxamide, also known as AB-CHIMINACA (hereinafter AB-CHIMINACA), all of which were intended for human consumption as a drug.

9. **R.A. NAWAZ, POLYANSKIY, BUTLER, GONZALES** and others provided packages of synthetic cannabinoids to **S.M. NAWAZ, HOUSTON, SANDFORT, RADER, SHIRLEY, MILLER, BROWNING, SHEETS, BRUCE** and others with labels that misidentified the contents as “incense,” “aroma therapy,” or “potpourri,” that were “not for human consumption.” These labels also identified the contents by trade names, including the following: “Fish Food,” “RMX,” “Red Orchard,” “Donkey Punch,” “Dat Nola O.G. Blueberry Haze,” “Out World Luxury Potpourri,” “Bizzaro,” “Golden Leaf,” “Tropical Beach Pineapple,” “Twilite Cherry,” “Black Diamond,” “Passion,” “XXX Platinum,” “Pirate’s Booty,” “Passion Sense,” “Night Train,” “Darkness,” “Hedgehog,” “No Mames,” “Chill Out,” “Joker,” “Get Real,” “Crazy Monkey,” “Mind Trip,” “Zero Gravity,” “Dead Man Walking,” “Diablo,” “Purple Diesel,” “Volcano Aroma,” “Earthquake,” “Pure Evil,” “AK-47,” and “Mardi Gras.”

10. Each of these packages of synthetic cannabinoids were drugs that were misbranded in at least one of the following respects:

- a. The labeling on these synthetic drugs did not bear adequate directions for use;
- b. The labeling on these synthetic drugs had false and misleading information in that they were labeled in a manner indicating they were not for human

consumption when, in fact, the synthetic drugs were intended for human consumption; and

c. The packaging for these synthetic drugs did not bear a label identifying the name and place of the business of the manufacturer, packer or distributor.

11. **R.A. NAWAZ, POLYANSKIY, BUTLER, GONZALES** and others supplied laboratory reports to **HOUSTON, SANDFORT, RADER, SHIRLEY, MILLER, BROWNING, SHEETS, BRUCE** and others, which stated that the contents of these packages did not contain a controlled substance; however, the reports did not show that the laboratory tested for the presence of the synthetic cannabinoid compounds described in paragraph 9 and actually contained in the packages.

12. **R.A. NAWAZ, S.M. NAWAZ, BUTLER, GONZALES, POLYANSKIY, HOUSTON, SANDFORT, RADER, SHIRLEY, MILLER, BROWNING, SHEETS, BRUCE** and others falsely and misleadingly referred to these synthetic cannabinoids as “incense,” “aroma therapy,” or “potpourri,” that were “not for human consumption.”

13. **R.A. NAWAZ, S.M. NAWAZ, POLYANSKIY, BUTLER, GONZALES, HOUSTON, SANDFORT, RADER, SHIRLEY, MILLER, BROWNING, SHEETS, BRUCE** and others intended to defraud and mislead government authorities that the contents of packages of “Fish Food,” “RMX,” “Red Orchard,” “Donkey Punch,” “Dat Nola O.G. Blueberry Haze,” “Out World Luxury Potpourri,” “Bizzaro,” “Golden Leaf,” “Tropical Beach Pineapple,” “Twilite Cherry,” “Black Diamond,” “Passion,” “XXX Platinum,” “Pirate’s Booty,” “Passion Sense,” “Night Train,” “Darkness,” “Hedgehog,” “No Mames,” “Chill Out,” “Joker,” “Get Real,” “Crazy Monkey,” “Mind Trip,” “Zero Gravity,” “Dead Man Walking,” “Diablo,” “Purple Diesel,” “Volcano Aroma,” “Earthquake,” “Pure Evil,” “AK-47,” and “Mardi Gras,” and other

trade names, were synthetic cannabinoids for the purpose of avoiding Government regulation over these drugs and to protect the continued sale of these drugs to the public in exchange for money.

14. **HOUSTON, SANDFORT, SHIRLEY, BROWNING and SHEETS**, individually and through First Stop Last Stop Pawn & Aromatherapy, Inscentives Auto, Inscentives Resale, Essentials Resale, S&J Tobacco, and others purchased cashier's checks, bank disbursement checks, and money orders payable to **R.A. NAWAZ**, businesses he controlled, or individuals he supervised, to pay for these synthetic cannabinoids. These cashier's checks and money orders were sent to **R.A. NAWAZ** and others via FedEx and UPS.

15. **HOUSTON, SANDFORT and SHIRLEY**, through First Last Stop Pawn & Aromatherapy, Inscentives Auto, Inscentives Resale, and others, purchased cashier's checks, bank disbursement checks, and money orders payable to **BUTLER and GONZALES**, businesses they controlled, or individuals they supervised, to pay for packages of synthetic cannabinoids. These cashier's checks and money orders were sent to **BUTLER, GONZALES** and others via FedEx and UPS.

16. **R.A. NAWAZ, POLYANSKIY, BUTLER, GONZALES** and others deposited cashier's checks, bank disbursement checks, money orders, and other monetary instruments purchased by **HOUSTON, SANDFORT, RADER, SHIRLEY, BROWNING and SHEETS** into various bank accounts that they controlled.

17. **BROWNING and SHEETS** sent United States currency to **POLYANSKIY** in the aggregate amount of approximately \$35,100.00 between January 9, 2015, and January 14, 2015.



18. **HOUSTON, SANDFORT and SHIRLEY** sent United States currency to **POLYANSKIY** in the aggregate amount of approximately \$63,800.00 between January 30, 2015, and February 4, 2015.

19. Between January 16, 2013, and April 18, 2015, **HOUSTON, SANDFORT, RADER, SHIRLEY, BROWNING and SHEETS** paid at least \$2,866,676.45 to **R.A. NAWAZ, POLYANSKIY, BUTLER, GONZALES** and others for synthetic cannabinoids.

20. The nature and source of the proceeds of the distribution of synthetic cannabinoids involved in the transactions described in paragraphs 14 through 19 of this Indictment was concealed by the transfer of funds between business entities created to conduct lawful commerce.

21. Between November 18, 2012, and July 1, 2014, **R.A. NAWAZ** engaged in numerous financial transactions through which he transmitted approximately \$387,114 in proceeds from the distribution of synthetic cannabinoids from the United States to the Islamic Republic of Pakistan, to conceal these proceeds.

**COUNT 1**  
(Conspiracy to Commit Mail Fraud)  
18 U.S.C. § 1349

**The Conspiracy and Its Objects**

22. Between December 18, 2012, and July 16, 2015, said dates being approximate, in Callaway County, within the Western District of Missouri, and elsewhere, the defendants, **RAJA AMER NAWAZ a/k/a "Rex," SHEILA MARIE NAWAZ, MICHAEL JAMES BUTLER, CURTIS WHAYNE GONZALES a/k/a "Curtis Whayne," ALEKSANDR POLYANSKIY, JASON. LEE HOUSTON, SHAWN MICHAEL BROWNING, TIMOTHY CHRISTOPHER SANDFORT, JOSHUA ADAM SHEETS, BRANDON DEREK RADER,**

**DARA LEANNE SHIRLEY, CASEY DWAYNE MILLER and BILLIE L. BRUCE,** knowingly and intentionally combined, conspired and agreed with each other and others, known and unknown to the Grand Jury, to commit an offense against the United States, that is, having devised and intended to devise a scheme to defraud the Food and Drug Administration, to defraud the public, and to obtain money by means of materially false and fraudulent pretenses and representations, that is, false pretenses and representations that synthetic cannabinoid products sold under the trade names “Fish Food,” “RMX,” “Red Orchard,” “Donkey Punch,” “Dat Nola O.G. Blueberry Haze,” “Out World Luxury Potpourri,” “Bizzaro,” “Golden Leaf,” “Tropical Beach Pineapple,” “Twilite Cherry,” “Black Diamond,” “Passion,” “XXX Platinum,” “Pirate’s Booty,” “Passion Sense,” “Night Train,” “Darkness,” “Hedgehog,” “No Mames,” “Chill Out,” “Joker,” “Get Real,” “Crazy Monkey,” “Mind Trip,” “Zero Gravity,” “Dead Man Walking,” “Diablo,” “Purple Diesel,” “Volcano Aroma,” “Earthquake,” “Pure Evil,” “AK-47,” and “Mardi Gras,” were “incense,” “aroma therapy” or “potpourri” and were “not for human consumption” when, in truth and fact, these products were drugs intended for human consumption as a drug, and for the purpose of executing such scheme and artifice, mailed and caused to be mailed synthetic cannabinoid products sent and delivered by commercial interstate carrier, all contrary to the provisions of Title 18, United States Code, Section 1341.

#### **Manner and Means**

23. The members of the conspiracy used various manners and means to effect the objects and purposes of the conspiracy, including but not limited to, the following:

24. The factual allegations in paragraphs 1 through 13 of this Indictment are incorporated by reference as if fully set forth herein to allege the manner and means used by the defendants, **RAJA AMER NAWAZ a/k/a “Rex,” SHEILA MARIE NAWAZ, MICHAEL**

**JAMES BUTLER, CURTIS WHAYNE GONZALES a/k/a “Curtis Whayne,” ALEKSANDR POLYANSKIY, JASON LEE HOUSTON, SHAWN MICHAEL BROWNING, TIMOTHY CHRISTOPHER SANDFORT, JOSHUA ADAM SHEETS, BRANDON DEREK RADER, DARA LEANNE SHIRLEY, CASEY DWAYNE MILLER and BILLIE L. BRUCE,** to further of the conspiracy.

25. It was part of the conspiracy that, beginning as early as December 18, 2012, **HOUSTON, SANDFORT, RADER, BROWNING, SHEETS, SHIRLEY, MILLER, BRUCE** and others ordered synthetic cannabinoids from business entities or individuals controlled and supervised by **R.A. NAWAZ, POLYANSKIY, BUTLER** and **GONZALES**.

26. It was part of the conspiracy that, at least 190 times between September 4, 2013, and December 24, 2014, said dates being approximate, **R.A. NAWAZ**, assisted by **POLYANSKIY**, through MOJO Distribution, Aromatic Novelties, and Top Notch Novelties, shipped synthetic cannabinoids from California and Nevada to **HOUSTON, SANDFORT, RADER, BROWNING, SHEETS, SHIRLEY, MILLER, BRUCE** and others at various locations in Callaway County, Missouri, via FedEx and UPS.

27. It was part of the conspiracy that, at least 37 times between June 24, 2014, and April 14, 2015, said dates being approximate, **BUTLER** and **GONZALES**, through Butler-Whayne Industries, shipped synthetic cannabinoids from California to **HOUSTON, SANDFORT, RADER, SHIRLEY** and **MILLER**, at various locations in Callaway County, Missouri, via UPS.

28. It was part of the conspiracy that, at least 24 times between January 8, 2015, and April 14, 2015, said dates being approximate, **POLYANSKIY**, through ANOP a/k/a A-1 Distribution, shipped synthetic cannabinoids from Nevada to **HOUSTON, SANDFORT,**

**RADER, BROWNING, SHEETS, SHIRLEY, MILLER and BRUCE**, at various locations in Callaway County, Missouri, via UPS.

29. All in violation of Title 18, United States Code, Section 1349.

**COUNT 2**

(Conspiracy to Distribute a Controlled Substance)  
21 U.S.C. §§ 846, 802(32)(A), 813 and 841(a)(1)

30. Between December 18, 2012, and July 16, 2015, said dates being approximate, in Callaway County, in the Western District of Missouri, and elsewhere, the defendants, **RAJA AMER NAWAZ a/k/a "Rex," SHEILA MARIE NAWAZ, MICHAEL JAMES BUTLER, CURTIS WHAYNE GONZALES a/k/a "Curtis Whayne," ALEKSANDR POLYANSKIY, JASON LEE HOUSTON, SHAWN MICHAEL BROWNING, TIMOTHY CHRISTOPHER SANDFORT, JOSHUA ADAM SHEETS, BRANDON DEREK RADER, DARA LEANNE SHIRLEY, CASEY DWAYNE MILLER and BILLIE L. BRUCE**, knowingly and intentionally conspired and agreed with each other and others, known and unknown to the Grand Jury, to distribute: a mixture or substance containing a detectable amount of XLR-11, 5F-PB-22, PB-22, AB-PINACA, FUB-144, NM-2201, 5F-AMB, THJ-2201, AB-CHIMINACA, and 5F-AB-PINACA, each a controlled substance analogue as defined in 21 U.S.C. § 802(32)(A), knowing that each substance was intended for human consumption as provided in 21 U.S.C. § 813, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), all in violation of Title 21, United States Code, Section 846.

**COUNT 3**  
(Conspiracy to Distribute a Controlled Substance)  
21 U.S.C. § 846

31. Between February 10, 2014, and July 16, 2015, said dates being approximate, in Callaway County, in the Western District of Missouri, and elsewhere, the defendants, **RAJA AMER NAWAZ a/k/a “Rex,” SHEILA MARIE NAWAZ, MICHAEL JAMES BUTLER, CURTIS WHAYNE GONZALES a/k/a “Curtis Whayne,” ALEKSANDR POLYANSKIY, JASON LEE HOUSTON, SHAWN MICHAEL BROWNING, TIMOTHY CHRISTOPHER SANDFORT, JOSHUA ADAM SHEETS, BRANDON DEREK RADER, DARA LEANNE SHIRLEY, CASEY DWAYNE MILLER and BILLIE L. BRUCE,** knowingly and intentionally conspired and agreed with each other and others, known and unknown to the Grand Jury, to distribute: a mixture or substance containing a detectable amount of AB-PINACA, XLR-11, UR-144, AB-FUBINACA, and AB-CHIMINACA, all Schedule I controlled substances, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), all in violation of Title 21, United States Code, Section 846.

**COUNT 4**  
(Distribution of a Controlled Substance)  
21 U.S.C. § 841(a)(1)

32. On or about July 16, 2015, said date being approximate, in Callaway County, in the Western District of Missouri, and elsewhere, the defendants, **SHAWN MICHAEL BROWNING, JOSHUA ADAM SHEETS and BILLIE L. BRUCE,** aiding and abetting each other and others, knowingly and intentionally distributed a mixture or substance containing detectable amounts of AB-CHIMINACA and XLR-11, each a Schedule I controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT 5**

(Possession with Intent to Distribute a Controlled Substance)

21 U.S.C. § 841(a)(1)

33. On or about July 16, 2015, said date being approximate, in Callaway County, in the Western District of Missouri, and elsewhere, the defendants, **SHAWN MICHAEL BROWNING, JOSHUA ADAM SHEETS** and **BILLIE L. BRUCE**, aiding and abetting each other and others, knowingly and intentionally possessed with the intent to distribute mixtures or substances containing detectable amounts of XLR-11, AB-CHIMINACA, AB-PINACA, and AB-FUBINACA, all Schedule I controlled substances, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT 6**

(Distribution of a Controlled Substance)

21 U.S.C. § 841(a)(1)

34. On or about July 16, 2015, said date being approximate, in Callaway County, in the Western District of Missouri, and elsewhere, the defendants, **JASON LEE HOUSTON, TIMOTHY CHRISTOPHER SANDFORT, BRANDON DEREK RADER** and **CASEY DEWAYNE MILLER**, aiding and abetting each other and others, knowingly and intentionally distributed a mixture or substance containing detectable amounts of AB-PINACA, XLR-11, and AB-FUBINACA, all Schedule I controlled substances, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT 7**

(Possession with Intent to Distribute a Controlled Substance)

21 U.S.C. § 841(a)(1)

35. On or about July 16, 2015, said date being approximate, in Callaway County, in the Western District of Missouri, and elsewhere, the defendants, **JASON LEE HOUSTON, TIMOTHY CHRISTOPHER SANDFORT, BRANDON DEREK RADER** and **CASEY**

**DEWAYNE MILLER**, knowingly and intentionally possessed with the intent to distribute mixtures or substances containing detectable amounts of XLR-11, AB-CHIMINACA, AB-PINACA, and AB-FUBINACA, all Schedule I controlled substances, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

**COUNTS 8 through 11**

(Maintaining a Place for the Purpose of Storing and Distributing a Controlled Substance)  
21 U.S.C. § 856(a)(1)

36. Between the dates set forth below in each individual count, said dates being approximate, in the Western District of Missouri, and elsewhere, the defendants listed in each individual count, aiding and abetting each other and others, opened and maintained the commercial premises listed in each individual count, for the purpose of unlawfully storing and distributing mixtures or substances containing detectable amounts of XLR-11, 5F-AB-PINACA, 5F-AMB, AB-CHIMINACA, NM-2201, AB-PINACA, and AB-FUBINACA, all Schedule I controlled substances, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C):

<b>COUNT</b>	<b>DATES</b>	<b>DEFENDANTS</b>	<b>COMMERCIAL PREMISES</b>
<b>8</b>	December 18, 2012, and December 5, 2014	<b>JASON LEE HOUSTON, TIMOTHY CHRISTOPHER SANDFORT and BRANDON DEREK RADER</b>	Inscentives Resale, 6579 CR 176, Auxvasse, Callaway County, Missouri
<b>9</b>	December 18, 2012, and April 1, 2014	<b>JASON LEE HOUSTON, TIMOTHY CHRISTOPHER SANDFORT and BRANDON DEREK RADER</b>	Inscentives Resale, 1201 S. Business 54, Fulton, Callaway County, Missouri
<b>10</b>	April 1, 2014, and July 16, 2015	<b>JASON LEE HOUSTON, TIMOTHY CHRISTOPHER SANDFORT and BRANDON DEREK RADER</b>	Inscentives Resale, 601 Airway Dr., Fulton, Callaway County, Missouri

COUNT	DATES	DEFENDANTS	COMMERCIAL PREMISES
11	October 21, 2013, and July 16, 2015	SHAWN MICHAEL BROWNING and JOSHUA ADAM SHEETS	S&J Smoke Shop, 1753 CR 4036 a/k/a 1753 Halifax Dr., Holts Summit, Callaway County, Missouri

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

**COUNT 12**  
(Conspiracy to Commit Money Laundering)  
18 U.S.C. § 1956(h)

38. Between December 18, 2012, and July 16, 2015, said dates being approximate, in Callaway County, in the Western District of Missouri, and elsewhere, the defendants, **RAJA AMER NAWAZ a/k/a “Rex,” MICHAEL JAMES BUTLER, CURTIS WHAYNE GONZALES a/k/a “Curtis Wayne,” JASON LEE HOUSTON, SHAWN MICHAEL BROWNING, TIMOTHY CHRISTOPHER SANDFORT, JOSHUA ADAM SHEETS, BRANDON DEREK RADER and DARA LEANNE SHIRLEY**, knowingly and intentionally combined, conspired and agreed with each other and others, known and unknown to the Grand Jury, to commit offenses against the United States in violation of Title 18, United States Code, Sections 1956 and 1957, to wit:

a. to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, conspiracy to commit mail fraud as charged in Count 1, conspiracy to distribute controlled substance analogues, as charged in Count 2 of this Indictment, and conspiracy to distribute controlled substances, as charged in Count 3 of this Indictment, with the intent to promote the carrying on of that specified unlawful activity, and that while conducting and attempting to conduct such financial



transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, contrary to the provisions of Title 18, United States Code, Section 1956(a)(1)(A)(i);

b. to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, conspiracy to commit mail fraud as charged in Count 1, conspiracy to distribute controlled substance analogues, as charged in Count 2 of this Indictment, and conspiracy to distribute controlled substances, as charged in Count 3 of this Indictment, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and,

c. to knowingly engage and attempt to engage in monetary transactions by, through or to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, that is, funds, such property having been derived from a specified unlawful activity, that is, conspiracy to commit mail fraud, as charged in Count 1 of this Indictment, conspiracy to distribute controlled substance analogues, as charged in Count 2 of this Indictment, and conspiracy to distribute controlled substances, as charged in Count 3 of this Indictment, contrary to the provisions of Title 18, United States Code, Section 1957(a).

### Manner and Means

39. The members of the conspiracy used various manners and means to effect the objects and purposes of the conspiracy, including but not limited to the following:

40. The factual allegations in paragraphs 13 through 20 of this Indictment are incorporated by reference as if fully set forth herein to allege the manner and means used by the defendants, **RAJA AMER NAWAZ a/k/a "Rex," MICHAEL JAMES BUTLER, CURTIS WHAYNE GONZALES a/k/a "Curtis Whayne," JASON LEE HOUSTON, SHAWN MICHAEL BROWNING, TIMOTHY CHRISTOPHER SANDFORT, JOSHUA ADAM SHEETS, BRANDON DEREK RADER and DARA LEANNE SHIRLEY**, to further of the conspiracy.

41. It was part of the conspiracy that, on or about November 28, 2012, **HOUSTON** and **RADER** opened a United Credit Union checking account in Fulton, Missouri, for First Stop Last Stop Pawn and Aromatherapy.

42. It was part of the conspiracy that, on or about January 22, 2013, **SANDFORT** used United States currency that represented the proceeds of mail fraud and the distribution of controlled substance analogues to purchase and remit a \$1,040.00 Central Bank cashier's check payable to MOJO Industries as payment for synthetic cannabinoids, which **R.A. NAWAZ** deposited into Bank of America account number ending in 3188.

43. It was part of the conspiracy that, on or about January 30, 2013, **HOUSTON** used United States currency that represented the proceeds of mail fraud and the distribution of controlled substance analogues to purchase and remit a \$561.50 Central Bank cashier's check payable to MOJO Distribution as payment for synthetic cannabinoids, which **R.A. NAWAZ** deposited into Bank of America account number ending in 3188.

44. It was part of the conspiracy that, on or about June 3, 2013, **SANDFORT** and **SHIRLEY** opened a Central Bank account in Fulton, Missouri, for Inscentives Resale.

45. It was part of the conspiracy that, on or about June 3, 2013, **RADER** opened a United Credit Union account in Fulton, Missouri, for Inscentives Auto.

46. It was part of the conspiracy that, on or about June 4, 2013, **SHIRLEY** used United States currency that represented the proceeds of mail fraud and the distribution of controlled substance analogues to purchase on behalf of Inscentives Resale a \$14,098.22 Central Bank cashier's check payable to MOJO Distribution as payment for synthetic cannabinoids, which **R.A. NAWAZ** deposited into Citibank account number ending in 9808.

47. It was part of the conspiracy that, on or about June 13, 2013, **BROWNING** and **SHEETS** opened a Central Bank account in Fulton, Missouri, for Essentials Resale.

48. It was part of the conspiracy that, on or about October 18, 2013, **BROWNING** used United States currency that represented the proceeds of mail fraud and the distribution of controlled substances analogues to purchase and remit a \$3,511.66 Central Bank disbursement check payable to MOJO Distribution as payment for synthetic cannabinoids, which **R.A. NAWAZ** deposited into Bank of America account number ending in 3188.

49. It was part of the conspiracy that, on or about November 20, 2013, First Stop Last Stop Pawn and Aromatherapy used United States currency that represented the proceeds of mail fraud and the distribution of controlled substances analogues to purchase and remit a \$4,900.00 United Credit Union cashier's check payable to Butler-Whayne Industries as payment for synthetic cannabinoids, which **BUTLER** and **GONZALES** deposited into Butler-Whayne Industries JP Morgan Chase account ending in 2917.

50. It was part of the conspiracy that, on or about January 14, 2014, **RADER** used United States currency that represented the proceeds of mail fraud and the distribution of controlled substances analogues to purchase and remit a \$3,400 United Credit Union money order as payment for synthetic cannabinoids.

51. It was part of the conspiracy that, on or about March 18, 2014, **SHEETS** used United States currency that represented the proceeds of mail fraud and the distribution of controlled substances analogues to purchase and remit a \$5,700 Central Bank Bank Disbursement Check payable to R. Nawaz as payment for synthetic cannabinoids, which **R.A. NAWAZ** endorsed and deposited into a bank account he controlled.

**COUNTS 13 and 14**

(Conducting a Financial Transaction in Excess of \$10,000 with Criminally Derived Proceeds)  
18 U.S.C. § 1957(a)

52. On or about the dates set forth below in each individual count, within Callaway County, in the Western District of Missouri and elsewhere, the defendant listed in each individual count, did knowingly engage and attempt to engage in the following monetary transactions by, through or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, that is the deposit and transfer of funds and monetary instruments, such property having been derived from a specified unlawful activity, that are, conspiracy to commit mail fraud, as charged in Count 1 of this Indictment, conspiracy to distribute controlled substance analogues, as charged in Count 2 of this Indictment, and conspiracy to distribute controlled substances, as charged in Count 3 of this Indictment:

COUNT	DATE	MONETARY TRANSACTION
13	June 4, 2013	<b>R.A. NAWAZ, HOUSTON, SANDFORT, RADER and SHIRLEY</b> , aiding and abetting each other, transferred Central Bank cashier's check number 118280, in the amount \$14,098.22, from Inscentives Resale, in Fulton, Missouri, to MOJO Distribution in Sacramento, California
14	November 25, 2013	<b>R.A. NAWAZ, HOUSTON, SANDFORT, RADER and SHIRLEY</b> , aiding and abetting each other, transferred Central Bank cashier's check number 118646, in the amount \$13,250.43, from Inscentives Resale, in Fulton, Missouri, to MOJO Distribution in Sacramento, California

53. All in violation of Title 18, United States Code, Section 1957(a).

**FORFEITURE ALLEGATION 1**

(In violation of Title 18 U.S.C. § 1349 - Conspiracy to Commit Mail Fraud)

54. The allegations of Count 1 of this Indictment are re-alleged and fully incorporated herein by reference for the purpose of alleging forfeiture to the United States of America of property in which one or more of the defendants has an interest, pursuant to the provisions of Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

55. Upon conviction of the offense alleged in Count 1, the defendants, **RAJA AMER NAWAZ a/k/a "Rex," SHEILA MARIE NAWAZ, MICHAEL JAMES BUTLER, CURTIS WHAYNE GONZALES a/k/a "Curtis Wayne," ALEKSANDR POLYANSKIY, JASON LEE HOUSTON, SHAWN MICHAEL BROWNING, TIMOTHY CHRISTOPHER SANDFORT, JOSHUA ADAM SHEETS and BRANDON DEREK RADER**, shall forfeit to the United States of America, any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses alleged in Count 1, all pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), including, but not limited to, the following:

### **Money Judgment**

56. A sum of money equal to \$6,656,843.00 in United States currency, representing a sum of money equal to the total amount of money involved in the conspiracy to commit a violation of Title 18, United States Code, Section 1349, for which a defendant is convicted. If more than one defendant is convicted of Count 1, the defendants so convicted are jointly and severally liable for the amount involved in such offense.

### **Real Property**

57. The real property known and numbered as 601 Airway Drive, Fulton, Missouri, 65251 with all its appurtenances, improvements, and attachments thereon, and is more fully described as:

Part of the Southwest Quarter of Section Eighteen (18), Township Forty-seven (47) North, Range nine (9) West, in Callaway County Missouri, more particularly described as follows: Commencing at a set ½ inch iron pin and a found corner fence post, at the Quarter Section corner on the West side of said Section Eighteen (18); thence South 89 degrees 27' East, 2407.60 feet, along the East and West centerline of said Section 18 to a set ½ in iron pin and the point of beginning of the tract herein described; thence South 89 degrees 27' East 273.30 feet, continuing along the East-West centerline of said Section 18, to a set ½ inch iron rod pin (witness: South 89 degrees 27' East, 643.90 feet to a found Railroad iron for the center of said Section 18; thence South 39 degrees 12' West, 4.10 feet to a found steal post for Right-of-way marker (reference: State Route "F" connection centerline Section 7+27.90); thence South 38 degrees 32 west 126.90 feet to a found steal post for Right-of-way marker (reference: State Route "F" connection centerline Station 8+55); thence South 88 degrees 43' West 92.50 feet to a found steal post for Right-of-Way marker (Reference: State Route "F" centerline Station 490-920; thence North 42 degrees 47' West, 146.0 feet to the Point of Beginning. Except that part conveyed to the State of Missouri for Highway Purposes.

### **Personal Property**

58. \$3,070.00 of United States Currency seized from Inscentives Resale, 601 Airway Drive, Fulton, Missouri, on July 16, 2015.

59. \$9,581.00 of United States Currency seized from S&J Tobacco, 1753 Halifax, Holts Summit, Missouri, on July 16, 2015.

60. \$3,028.00 of United States Currency seized from **BROWNING** on July 16, 2015.

**Bank Accounts**

61. All United States currency, funds or other monetary instruments credited to United Credit Union account number \*\*\*\*2400-009 in the name of Inscentives Auto and located in Fulton, Missouri.

62. All United States currency, funds or other monetary instruments credited to Central Bank account number \*\*\*\*7202 in the name of Inscentives Resale and located in Fulton, Missouri.

**FORFEITURE ALLEGATION 2**

(In violation of 21 U.S.C. § 846 – Conspiracy to Distribute)

63. The allegations contained in Count 3 of this Indictment are realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853.

64. The defendants, **RAJA AMER NAWAZ a/k/a “Rex,” SHEILA MARIE NAWAZ, MICHAEL JAMES BUTLER, CURTIS WHAYNE GONZALES a/k/a “Curtis Whayne,” ALEKSANDR POLYANSKIY, JASON LEE HOUSTON, SHAWN MICHAEL BROWNING, TIMOTHY CHRISTOPHER SANDFORT, JOSHUA ADAM SHEETS and BRANDON DEREK RADER**, shall forfeit to the United States all property, real and personal, constituting and derived from any proceeds said defendant obtained directly and indirectly as a result of the violation incorporated by reference in this Forfeiture Allegation, and all property used, or intended to be used, in any manner or part, to commit, and to facilitate the commission

of the violation incorporated by reference in this Forfeiture Allegation, including but not limited to, the following:

**Money Judgment**

65. A sum of money equal to \$321,585.00 in United States currency, representing a sum of money equal to the total amount of money involved in the conspiracy to commit a violation of Title 18, United States Code, Section 1349, for which a defendant is convicted. If more than one defendant is convicted of Count 1, the defendants so convicted are jointly and severally liable for the amount involved in such offense.

**Real Property**

66. The real property known and numbered as 601 Airway Drive, Fulton, Missouri, 65251 with all its appurtenances, improvements, and attachments thereon, and is more fully described as:

Part of the Southwest Quarter of Section Eighteen (18), Township Forty-seven (47) North, Range nine (9) West, in Callaway County Missouri, more particularly described as follows: Commencing at a set ½ inch iron pin and a found corner fence post, at the Quarter Section corner on the West side of said Section Eighteen (18); thence South 89 degrees 27' East, 2407.60 feet, along the East and West centerline of said Section 18 to a set ½ in iron pin and the point of beginning of the tract herein described; thence South 89 degrees 27' East 273.30 feet, continuing along the East-West centerline of said Section 18, to a set ½ inch iron rod pin (witness: South 89 degrees 27' East, 643.90 feet to a found Railroad iron for the center of said Section 18; thence South 39 degrees 12' West, 4.10 feet to a found steal post for Right-of-way marker (reference: State Route "F" connection centerline Station 7+27.90); thence South 38 degrees 32 west 126.90 feet to a found steal post for Right-of-way marker (reference: State Route "F" connection centerline Station 8+55); thence South 88 degrees 43' West 92.50 feet to a found steal post for Right-of-Way marker (Reference: State Route "F" centerline Station 490-920; thence North 42 degrees 47' West, 146.0 feet to the Point of Beginning. Except that part conveyed to the State of Missouri for Highway Purposes.



### Personal Property

67. \$3,070.00 of United States Currency seized from Inscentives Resale, 601 Airway Drive, Fulton, Missouri, on July 16, 2015.

68. \$9,581.00 of United States Currency seized from S&J Tobacco, 1753 Halifax, Holts Summit, Missouri, on July 16, 2015.

69. \$3,028.00 of United States Currency seized from **BROWNING** on July 16, 2015.

### Bank Accounts

70. All United States currency, funds or other monetary instruments credited to United Credit Union account number \*\*\*\*2400-009 in the name of Inscentives Auto and located in Fulton, Missouri.

71. All United States currency, funds or other monetary instruments credited to Central Bank account number \*\*\*\*7202 in the name of Inscentives Resale and located in Fulton, Missouri.

### Substitute Assets

72. In the event that the property which is subject to forfeiture to the United States, as a result of an act or omission of the defendants:

- a. cannot be located upon exercise of due diligence;
- b. has been placed beyond the jurisdiction of the Court;
- c. has been transferred or sold to, or deposited with a third party;
- d. has been substantially diminished in value; or
- e. has been commingled with other which cannot be divided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of the defendants up to the value of such property, pursuant to Title 21, United States Code, Section 853(p), made applicable to these offenses by Title 18, United States Code, Section 982(b).

### **FORFEITURE ALLEGATION 3**

(In violation of Title 18 U.S.C. § 1956(h) - Conspiracy to Commit Money Laundering)

73. The allegations contained in Count 12 of this Indictment are re-alleged and incorporated by reference for the purpose of alleging a forfeiture pursuant to the provisions of Title 18, United States Code, Section 982(a)(1).

74. Upon conviction of the offense alleged in Count 12, the defendants, **RAJA AMER NAWAZ a/k/a “Rex,” MICHAEL JAMES BUTLER, CURTIS WHAYNE GONZALES a/k/a “Curtis Wayne,” JASON LEE HOUSTON, SHAWN MICHAEL BROWNING, TIMOTHY CHRISTOPHER SANDFORT, JOSHUA ADAM SHEETS and BRANDON DEREK RADER**, shall forfeit to the United States the following property:

a. All right, title and interest in any and all property involved in each offense in violation of Title 18, United States Code, Section 1956, or conspiracy to commit such offense, for which the defendant is convicted, and all property traceable to such property, including the following:

i. all money or other property that was the subject of each transaction, transportation, transmission or transfer in violation of Section 1956;

ii. all commissions, fees and other property constituting proceeds obtained as a result of those violations; and

iii. all property used in any manner or part to commit or to facilitate the commission of those violations.

75. The property to be forfeited includes, but is not limited to, the following:

**Money Judgment**

76. A sum of money equal to \$6,656,843.00 in United States currency, representing a sum of money equal to the total amount of money involved in the conspiracy to commit a violation of Title 18, United States Code, Section 1349, for which a defendant is convicted. If more than one defendant is convicted of Count 1, the defendants so convicted are jointly and severally liable for the amount involved in such offense.

**Real Property**

77. The real property known and numbered as 601 Airway Drive, Fulton, Missouri, 65251 with all its appurtenances, improvements, and attachments thereon, and is more fully described as:

Part of the Southwest Quarter of Section Eighteen (18), Township Forty-seven (47) North, Range nine (9) West, in Callaway County Missouri, more particularly described as follows: Commencing at a set ½ inch iron pin and a found corner fence post, at the Quarter Section corner on the West side of said Section Eighteen (18); thence South 89 degrees 27' East, 2407.60 feet, along the East and West centerline of said Section 18 to a set ½ in iron pin and the point of beginning of the tract herein described; thence South 89 degrees 27' East 273.30 feet, continuing along the East-West centerline of said Section 18, to a set ½ inch iron rod pin (witness: South 89 degrees 27' East, 643.90 feet to a found Railroad iron for the center of said Section 18; thence South 39 degrees 12' West, 4.10 feet to a found steal post for Right-of-way marker (reference: State Route "F" connection centerline Section 7+27.90); thence South 38 degrees 32 west 126.90 feet to a found steal post for Right-of-way marker (reference: State Route "F" connection centerline Station 8+55); thence South 88 degrees 43' West 92.50 feet to a found steal post for Right-of-Way marker (Reference: State Route "F" centerline Station 490-920; thence North 42 degrees 47' West, 146.0 feet to the Point of Beginning. Except that part conveyed to the State of Missouri for Highway Purposes.

**Personal Property**

78. \$3,070.00 of United States Currency seized from Inscentives Resale, 601 Airway Drive, Fulton, Missouri, on July 16, 2015.

79. \$9,581.00 of United States Currency seized from S&J Tobacco, 1753 Halifax, Holts Summit, Missouri, on July 16, 2015.

80. \$3,028.00 of United States Currency seized from **BROWNING** on July 16, 2015.

#### **Bank Accounts**

81. All United States currency, funds or other monetary instruments credited to United Credit Union account number \*\*\*\*2400-009 in the name of Inscenives Auto and located in Fulton, Missouri.

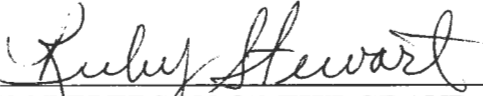
82. All United States currency, funds or other monetary instruments credited to Central Bank account number \*\*\*\*7202 in the name of Inscenives Resale and located in Fulton, Missouri.

#### **Substitute Assets**

83. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), each defendant shall forfeit substitute property, up to the value of the amount described in this count, if, by any act or omission of the defendant, the property described herein, or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred, 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.

84. All in accordance with Title 18, United States Code, Section 982(a)(1), and Rule 32.2(a), Federal Rules of Criminal Procedure.

**A TRUE BILL**

  
\_\_\_\_\_  
**FOREPERSON OF THE GRAND JURY**

  
\_\_\_\_\_  
**MICHAEL S. OLIVER**  
Assistant United States Attorney

DATED: 4/20/2016