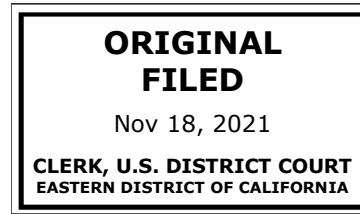


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8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

10  
11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 GARY STEPHEN MAYNARD,  
15 Defendant.  
16

CASE NO. 2:21-cr-0224 TLN

18 U.S.C. § 844(f)(1) – Arson to Federal Property (4 counts); 18 U.S.C. § 1855 – Set Timber Afire (1 count); 18 USC § 982(a)(2)(B) – Criminal Forfeiture

17  
18 INDICTMENT

19 COUNT ONE: [18 U.S.C. § 844(f)(1) – Arson to Federal Property]

20 The Grand Jury charges: T H A T

21 GARY STEPHEN MAYNARD,  
22 defendant herein, on or about July 20, 2021 (Cascade Fire), in Siskiyou County, State and Eastern  
23 District of California, maliciously damaged and destroyed, and attempted to damage and destroy, by  
24 means of fire personal and real property in whole or in part owned, possessed by, and leased to the  
25 United States, in violation of Title 18, United States Code, Section 844(f)(1).

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1 COUNT TWO: [18 U.S.C. § 844(f)(1) – Arson to Federal Property]

2 The Grand Jury further charges: T H A T

3 GARY STEPHEN MAYNARD,

4 defendant herein, on or about July 21, 2021 (Everitt Fire), in Siskiyou County, State and Eastern District  
5 of California, maliciously damaged and destroyed, and attempted to damage and destroy, by means of  
6 fire personal and real property in whole or in part owned, possessed by, and leased to the United States,  
7 in violation of Title 18, United States Code, Section 844(f)(1).

8 COUNT THREE: [18 U.S.C. § 844(f)(1) – Arson to Federal Property]

9 The Grand Jury further charges: T H A T

10 GARY STEPHEN MAYNARD,

11 defendant herein, on or about August 7, 2021 (Ranch Fire), in Lassen County, State and Eastern District  
12 of California, maliciously damaged and destroyed, and attempted to damage and destroy, by means of  
13 fire personal and real property in whole or in part owned, possessed by, and leased to the United States,  
14 in violation of Title 18, United States Code, Section 844(f)(1).

15 COUNT FOUR: [18 U.S.C. § 844(f)(1) – Arson to Federal Property]

16 The Grand Jury further charges: T H A T

17 GARY STEPHEN MAYNARD,

18 defendant herein, on or about August 7, 2021 (Conard Fire), in Lassen County, State and Eastern  
19 District of California, maliciously damaged and destroyed, and attempted to damage and destroy, by  
20 means of fire personal and real property in whole or in part owned, possessed by, and leased to the  
21 United States, in violation of Title 18, United States Code, Section 844(f)(1).

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1 COUNT FIVE: [18 U.S.C. § 1855 – Set Timber Afire]

2 The Grand Jury further charges: T H A T

3 GARY STEPHEN MAYNARD,

4 defendant herein, on or about August 7, 2021 (Ranch Fire), in Lassen County, State and Eastern District  
5 of California, did willfully and without authority set on fire timber, underbrush, and grass and other  
6 inflammable material upon the public domain and upon lands owned and leased and under the partial,  
7 concurrent and exclusive jurisdiction of the United States, in violation of Title 18, United States Code,  
8 Section 1855.

9 FORFEITURE ALLEGATION: [18 USC § 982(a)(2)(B) – Criminal Forfeiture]

10 1. Upon conviction of one or more of the offenses alleged in Counts One through Four of  
11 this Indictment, defendant GARY STEPHEN MAYNARD shall forfeit to the United States, pursuant to  
12 18 U.S.C. § 982(a)(2)(B), any property constituting or derived from proceeds obtained, directly or  
13 indirectly, as a result of such violations, including but not limited to the following:

14 a. A sum of money equal to the amount of proceeds traceable to such offenses, for  
15 which defendant is convicted.

16 2. If any property subject to forfeiture, as a result of the offenses alleged in Counts One  
17 through Four of this Indictment, for which defendant is convicted:

18 a. cannot be located upon the exercise of due diligence;

19 b. has been transferred or sold to, or deposited with, a third party;

20 c. has been placed beyond the jurisdiction of the court;

21 d. has been substantially diminished in value; or

22 e. has been commingled with other property which cannot be divided without difficulty;

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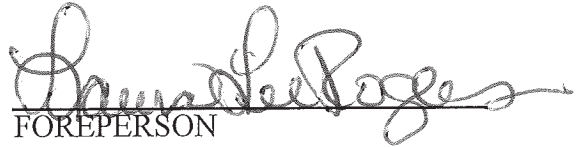
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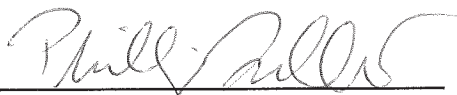
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1 it is the intent of the United States, pursuant to 18 U.S.C. § 982(b)(1), incorporating 21 U.S.C. § 853(p),  
2 to seek forfeiture of any other property of defendant, up to the value of the property subject to forfeiture.

3  
4 A TRUE BILL.

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10 FOREPERSON

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10 PHILLIP A. TALBERT  
11 Acting United States Attorney