

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

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**AARON VINCENT SCHWEIDLER, (01)**  
[DOB: 10/10/1984]

**MICHAEL G. PETERS, (02)**  
[DOB: 03/18/1988]

**SAMUEL C. MILLER IV, (03)**  
[DOB: 09/04/1986]

and

**NICOLE R. LYNE, (04)**  
[DOB: 12/30/1989]

Defendants.

Case No. \_\_\_\_\_

**COUNT ONE:** All Defendants  
***Conspiracy to Manufacture and Distribute  
Anabolic Steroids***

21 U.S.C. §§ 841(a)(1), (b)(1)(E), and 846  
NMT: 10 Years Imprisonment  
NMT: \$500,000 Fine  
NLT: 2 Years Supervised Release  
Class C Felony

**COUNT TWO:** All Defendants  
***Conspiracy to Commit Money Laundering***

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

**COUNT THREE:** All Defendants  
***Conspiracy to Commit Access Device Fraud***

18 U.S.C. §§ 371, 1029(a)(1)  
NMT: 5 Years Imprisonment  
NMT: \$250,000 Fine  
NMT: 3 Years Supervised Release  
Class D Felony

**COUNTS FOUR, FIVE and SIX:**

All Defendants  
***Access Device Fraud***  
18 U.S.C. §§ 1029(a)(1) and 2  
NMT: 10 Years Imprisonment  
NMT: \$250,000 Fine  
NMT: 3 Years Supervised Release  
Class C Felony

**COUNTS SEVEN, EIGHT and NINE:**

All Defendants

***Aggravated Identity Theft***

18 U.S.C. § 1028A

NLT: 2 Years Imprisonment,

NMT: \$250,000 Fine,

NMT: 1 Years Supervised Release

Class E Felony

Plus \$100 Mandatory Special Assessment on  
Each Count of Conviction

**FORFEITURE ALLEGATIONS**

18 U.S.C. § 982(a)(1) and 21 U.S.C. § 853

ALL DEFENDANTS

**INDICTMENT**

**THE GRAND JURY CHARGES THAT:**

**COUNT ONE**

**Conspiracy to Manufacture and Distribute Anabolic Steroids**

1) From on or about December 30, 2011, continuing until on or about the date of this Indictment, in the Western District of Missouri and elsewhere, the defendants, **AARON VINCENT SCHWEIDLER, MICHAEL G. PETERS, SAMUEL C. MILLER IV, and NICOLE R. LYNE**, did knowingly and intentionally combine, conspire, confederate and agree with each other and others known and unknown to the grand jury, to manufacture and distribute anabolic steroids, Schedule III controlled substances, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(E), all in violation of Title 21, United States Code, Section 846.

**COUNT TWO**  
**Conspiracy to Commit Money Laundering**

2) From on or about December 2011, continuing until on or about the date of this Indictment, in the Western District of Missouri and elsewhere, the defendants, **AARON VINCENT SCHWEIDLER, MICHAEL G. PETERS, SAMUEL C. MILLER IV, and NICOLE R. LYNE**, did knowingly combine, conspire, and agree with each other and with other persons known and unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit:

(a) to knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is, the manufacture and distribution of and conspiracy to manufacture and distribute anabolic steroids, schedule III controlled substances, with the intent to promote the carrying on of a specified unlawful activity, that is, the manufacture and distribution of and conspiracy to manufacture and distribute anabolic steroids, schedule III controlled substances, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity in violation 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, the manufacture and distribution of and conspiracy to manufacture and distribute anabolic steroids, schedule III controlled substances, 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);

(c) to transport, transmit and transfer and attempt to transport, transmit and transfer a monetary instrument and funds from a place in the United States to and through a place outside the United States with the intent to promote the carrying on of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(2)(A); and

(d) to transport, transmit, and transfer, and attempt to transport, transmit, and transfer a monetary instrument or funds involving the proceeds of specified unlawful activity, that is, the manufacture and distribution of and conspiracy to manufacture and distribute anabolic steroids, schedule III controlled substances, from a place in the United States to or through a place outside the United States, knowing that the funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i);

**Manner and Means of the Conspiracy**

3) The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

(a) It was part of the conspiracy that members of the conspiracy would operate an internet based company, “Power Trip” a/k/a “power-pharma.us”, offering for sale various anabolic steroids, schedule III controlled substances which were labeled with the company name “PowerTrip” and sold to customers throughout the United States, this involved mass marketing by means of an interactive computer service to customers that included among others, athletes and minors.

(b) It was part of the conspiracy that members of the conspiracy would sell various anabolic steroids, schedule III controlled substances via the internet and require customers to send payment for the steroids via various access devices, such as “Green Dot MoneyPak”, “MyVanilla Reload Cards,” “ReloadIT,” “NetSpend ReloadIT,” “Blackhawk Debit Cards,” “MoneyGram,” and “Western Union” utilizing names and account numbers for unauthorized access devices provided to the customers.

(c) It was part of the conspiracy that members of the conspiracy would unlawfully obtain the means of identification of other persons, which they used to fraudulently produce or obtain unauthorized access devices, such as “Green Dot MoneyPak”, “MyVanilla Reload Cards,” “ReloadIT,” “NetSpend ReloadIT,” “BlackHawk Debit Cards,” “MoneyGram,” and “Western Union,” all of which was designed at least in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds from the illegal transactions.

(d) It was part of the conspiracy that members of the conspiracy would ship the anabolic steroids via U.S. Mail and other common carriers to customers, and members of the conspiracy would utilize the proceeds from the sale of the anabolic steroids to purchase the necessary postage to ship the anabolic steroids to customers, often utilizing the fraudulently created unauthorized access devices.

(e) It was part of the conspiracy that members of the conspiracy would utilize the proceeds from the sale of the anabolic steroids to send funds outside of the United States to China via MoneyGram and Western Union to purchase the raw materials and other supplies to manufacture anabolic steroids, which they then sold and distributed to customers.

All in violation of Title 18, United States Code, Section 1956(h).

**COUNT THREE**  
**Conspiracy to Commit Access Device Fraud**

4) From on or about December 2011, continuing until on or about the date of this indictment, in the Western District of Missouri and elsewhere, the defendants, **AARON VINCENT SCHWEIDLER, MICHAEL G. PETERS, SAMUEL C. MILLER IV, and NICOLE R. LYNE**, knowingly and willfully conspired, combined, confederated and agreed

with each other and others known and unknown to the grand jury, to violate the laws of the United States, specifically, to commit access device fraud by knowingly and with the intent to defraud, trafficking in and using one or more unauthorized access devices during any one-year period, and by such conduct obtained anything of value aggregating \$1,000 or more, and the trafficking and use of such devices affected interstate and foreign commerce, in violation of 18 U.S.C. § 1029(a)(2).

**Manner and Means of the Conspiracy**

5. The manner and means by which the conspiracy operated included, but was not limited to the following:

(a) Paragraphs one through three as set forth above are re-alleged and expressly incorporated as if fully set forth herein.

(b) It was part of the conspiracy that members of the conspiracy would unlawfully obtain the means of identification of other persons, including but not limited to the names, social security numbers, and dates of birth. Members would either unlawfully purchase the means of identification or unlawfully take such means of identification from another person.

(c) It was part of the conspiracy that members of the conspiracy would then use the unlawfully obtained means of identification to fraudulently produce or obtain unauthorized access devices, such as “Green Dot MoneyPak,” “MyVanilla Reload Cards,” “ReloadIT,” “NetSpend ReloadIT,” “Blackhawk Debit Cards,” “MoneyGram,” and “Western Union,” in the names of the others.

(d) It was part of the conspiracy that members of the conspiracy would then provide these unauthorized access devices to their customers as the required method of payment

for the anabolic steroids, which allowed the conspiracy members to receive the illegal drug sale proceeds uploaded to the devices.

(e) It was part of the conspiracy that members of the conspiracy would utilize the proceeds from the illegal anabolic steroid sales deposited or loaded on the unauthorized access devices to withdraw cash or directly use the devices to pay for additional supplies, ingredients, controlled substances and other various expenses.

(f) The trafficking and use of the unauthorized access devices and means of identification of others was in interstate and foreign commerce, in furtherance of and as a result of the conspiracy described above.

#### Overt Acts

6. In furtherance of the conspiracy to commit access device fraud and to effect the object of the conspiracy, the following overt acts, among others, were committed or caused to be committed by the defendants in the Western District of Missouri and elsewhere:

- (a) On or about October 9, 2013, **AARON VINCENT SCHWEIDLER** utilized a Green Dot card in the name of C.B. to purchase U.S.P.S. postage to ship packages at the U.S.P.S. Boardwalk Station, 6304 NW Barry Road, Kansas City, Missouri.
- (b) On or about October 23, 2013, **AARON VINCENT SCHWEIDLER** utilized a Green Dot card in the name of C.B. to purchase U.S.P.S. postage to ship packages at the U.S.P.S. Boardwalk Station, 6304 NW Barry Road, Kansas City, Missouri.
- (c) On or about October 28, 2013, **AARON VINCENT SCHWEIDLER** utilized a Green Dot card in the name of C.B. to purchase U.S.P.S. postage to ship packages at the U.S.P.S. Boardwalk Station, 6304 NW Barry Road, Kansas City, Missouri.

- (d) On or about November 5, 2013, **AARON VINCENT SCHWEIDLER** utilized a Green Dot card in the name of C.B. to purchase U.S.P.S. postage to ship packages at the U.S.P.S. Boardwalk Station, 6304 NW Barry Road, Kansas City, Missouri.
- (e) Between on or about November 5, 2013 and on or about December 23, 2013, **AARON VINCENT SCHWEIDLER** packaged and shipped steroids to a customer in Lake Worth, Florida. The package listed a return address in Kansas City, Kansas for “Ace Electronics: Games & Accessories.” The steroids were contained in vials marked with a “POWERTRIP” label and found to contain methasterone, stanozolol, testosterone enanthate, and trenbolone acetate, all schedule III controlled substances.
- (f) On or about February 21, 2014, **NICOLE R. LYNE** utilized her BanCorp card to purchase U.S.P.S. postage to ship packages at the U.S.P.S. Boardwalk Station, 6304 NW Barry Road, Kansas City, Missouri.
- (g) Between on or about November 14, 2013 and on or about March 26, 2015, **NICOLE R. LYNE** purchased approximately \$600 in U.S.P.S. postage for shipping packages, utilizing BanCorp cards in her name.
- (h) Between on or about December 5, 2013 and on or about November 11, 2014, **AARON VINCENT SCHWEIDLER** purchased over \$5,000 in U.S.P.S. postage for shipping packages, utilizing BanCorp and AMEX cards in his name.
- (i) On or about April 9, 2014, **AARON VINCENT SCHWEIDLER** deposited 16 packages for shipment at the U.S.P.S. Boardwalk Station, 6304 NW Barry Road, Kansas City, Missouri. All 16 packages listed a return address in Kansas City, Missouri for “Hype Electronics & Game Super Store.” One of the packages was searched pursuant to a federal search warrant and was found to contain vials marked with a “POWERTRIP” label. Subsequent laboratory analysis confirmed that one of the vials tested contained chlorodehydromethyltestosterone, a schedule III controlled substance.
- (j) On or about April 22, 2014, a package shipped from China was delivered to **NICOLE R. LYNE** in Weston, Missouri.
- (k) Between on or about February 24, 2013 and on or about September 5, 2014, **MICHAEL G. PETERS** sent over \$1,500 to China via MoneyGram.



- (l) Between on or about December 30, 2011 and on or about September 22, 2013, **AARON VINCENT SCHWEIDLER** sent over \$96,000 to China via MoneyGram.
- (m) Between on or about January 6, 2014 and on or about April 18, 2014, **NICOLE R. LYNE** sent over \$9,000 to China via MoneyGram.
- (n) Between on or about June 7, 2012 and on or about November 12, 2013, **AARON VINCENT SCHWEIDLER** sent over \$80,000 to China via Western Union.
- (o) Between on or about October 17, 2013 and on or about October 31, 2013, **MICHAEL G. PETERS** sent over \$1,500 to China via Western Union.
- (p) On or about May 29, 2014, **AARON VINCENT SCHWEIDLER** and **NICOLE R. LYNE** possessed anabolic steroids, nandrolone decanoate, testosterone decanoate, testosterone propionate, all Schedule III controlled substances.
- (q) On or about July 2, 2014, **AARON VINCENT SCHWEIDLER** and **NICOLE R. LYNE** possessed anabolic steroids, testosterone propionate, oxandrolone, and methasterone, all schedule III controlled substances.
- (r) On or about December 23, 2014, **MICHAEL G. PETERS** and **SAMUEL C. MILLER IV** possessed anabolic steroids, Oxandrolone and Methandrostenolone, all Schedule III controlled substances, firearms, unauthorized access devices, several vials with PowerTrip labels, a PowerTrip customer list, sheets of PowerTrip labels, a recipe for the manufacture of anabolic steroids, and various product shipping labels.
- (s) On or about June 23, 2015, **MICHAEL G. PETERS** and **SAMUEL C. MILLER IV** possessed PowerTrip vial labels.
- (t) Between on or about February 27, 2013 and on or about June 13, 2014, conspirators had over \$14,000 in funds uploaded to a MyVanilla card in the name of K.K.
- (u) Between on or about February 21, 2013 and on or about May 13, 2013, conspirators had over \$7,000.00 in funds uploaded to Green Dot cards in the name of K.K.
- (v) Between on or about November 24, 2013 and on or about February 16, 2014, conspirators had over \$3,000.00 in funds uploaded to a MyVanilla card in the name of J.R.

- (w) Between on or about June 5, 2013 and on or about August 20, 2015, conspirators had over \$4,000.00 in funds uploaded to Green Dot cards in the name of C.W.
- (x) Between on or about April 22, 2013 and on or about March 7, 2014, conspirators had over \$8,000.00 in funds uploaded to Green Dot cards in the name of C.B.
- (y) Between on or about April 25, 2014 and on or about October 12, 2015, conspirators had over \$1,000.00 in funds uploaded to Green Dot cards in the name of **SAMUEL C. MILLER IV.**
- (z) Between on or about April 25, 2013 and on or about May 27, 2015, conspirators had over \$3,000.00 in funds uploaded to Green Dot cards in the name of **Aaron Vincent.**
- (aa) Between on or about April 26, 2013 and on or about June 10, 2013, conspirators had over \$2,000.00 in funds uploaded to Green Dot cards in the name of **MICHAEL G. PETERS.**
- (bb) Between on or about February 11, 2013 and on or about November 10, 2013, conspirators had over \$11,000.00 in funds uploaded to a MyVanilla card in the name of **MICHAEL G. PETERS.**
- (cc) Between on or about November 4, 2013 and on or about November 10, 2013, conspirators had over \$700.00 in funds uploaded to a MyVanilla card in the name of A.P.
- (dd) Between on or about December 19, 2013 and on or about February 27, 2015, conspirators had over \$3,000.00 in funds uploaded to a NetSpend card in the name of J.O.
- (ee) Between on or about April 22, 2014 and on or about November 29, 2014, conspirators had over \$3,000.00 in funds uploaded to a NetSpend card in the name of H.R.
- (ff) Between on or about April 21, 2014 and on or about December 18, 2014, conspirators had over \$15,000.00 in funds uploaded to a NetSpend card in the name of **SAMUEL MILLER.**
- (gg) Between on or about March 3, 2013 and on or about April 25, 2014, conspirators had over \$18,000.00 in funds uploaded to a NetSpend card in the name of A.P.

- (hh) Between on or about January 2013 and on or about October 12, 2015 conspirators had over \$200,000.00 in funds uploaded to various cards, such as MyVanilla, AMEX, Blackhawk, Green Dot, Bancorp, and Netspend, in the names of conspirators and in the names of others for which they did not have lawful authority to use such means of identification.
- (ii) The Grand Jury incorporates by reference herein, as additional overt acts, the access device fraud charges as set forth in Counts Four through Six, as well as the aggravated identity theft charges as set forth in Counts Seven through Nine.

All in violation of Title 18, United States Code, Section 371.

**COUNTS FOUR through SIX**  
**Access Device Fraud**

**COUNT FOUR**

7. From on or about February 2013, continuing until on or about February 2014, in the Western District of Missouri and elsewhere, the defendants, **AARON VINCENT SCHWEIDLER, MICHAEL G. PETERS, SAMUEL C. MILLER IV, and NICOLE R. LYNE**, aiding and abetting each other and others, knowingly and with intent to defraud, used and trafficked in one or more unauthorized access devices, that is, Green Dot Cards in the name of K.K., and by such conduct, during the one-year period obtained \$1,000 or more of U.S. currency and goods, and the use and trafficking affected interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 1029(a)(2), (c)(1) and Title 18, United States Code, Section 2.

**COUNT FIVE**

8. From on or about March 2013, continuing until on or about March 2014, in the Western District of Missouri and elsewhere, the defendants, **AARON VINCENT SCHWEIDLER, MICHAEL G. PETERS, SAMUEL C. MILLER IV, and NICOLE R.**

**LYNE**, aiding and abetting each other and others, knowingly and with intent to defraud, used and trafficked in one or more unauthorized access devices, that is, a MyVanilla card in the name of K.K., and by such conduct, during the one-year period obtained \$1,000 or more of U.S. currency and goods, and the use and trafficking affected interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 1029(a)(2) and (c)(1), and Title 18, United States Code, Section 2.

### **COUNT SIX**

9. From on or about November 2013, continuing until on or about November 2014, in the Western District of Missouri and elsewhere, the defendants, **AARON VINCENT SCHWEIDLER, MICHAEL G. PETERS, SAMUEL C. MILLER IV, and NICOLE R. LYNE**, aiding and abetting each other and others, knowingly and with intent to defraud, used and trafficked in one or more unauthorized access devices, that is, a MyVanilla card in the name of J.R., and by such conduct, during the one-year period obtained \$1,000 or more of U.S. currency and goods, and the use and trafficking affected interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 1029(a)(2), (c)(1) and Title 18, United States Code, Section 2.

### **COUNTS SEVEN through NINE** **Aggravated Identity Theft**

#### **COUNT SEVEN**

10. From on or about February 2013, continuing until on or about February 2014, in the Western District of Missouri and elsewhere, the defendants, **AARON VINCENT SCHWEIDLER, MICHAEL G. PETERS, SAMUEL C. MILLER IV, and NICOLE R. LYNE**, aiding and abetting each other and others, did knowingly transfer, possess and use

without lawful authority, the means of identification of another person, to wit, the name, social security number and date of birth of K.K., during and in relation to a felony offense, that being access device fraud as charged in Count Four herein.

All in violation of Title 18, United States Code, Section 1028A and Title 18, United States Code, Section 2.

### **COUNT EIGHT**

11. From on or about March 2013, continuing until on or about March 2014, in the Western District of Missouri and elsewhere, the defendants, **AARON VINCENT SCHWEIDLER, MICHAEL G. PETERS, SAMUEL C. MILLER IV, and NICOLE R. LYNE**, aiding and abetting each other and others, did knowingly transfer, possess and use without lawful authority, the means of identification of another person, to wit, the name, social security number and date of birth of K.K., during and in relation to a felony offense, that being access device fraud as charged in Count Five herein.

All in violation of Title 18, United States Code, Section 1028A and Title 18, United States Code, Section 2.

### **COUNT NINE**

12. From on or about November 2013, continuing until on or about November 2014, in the Western District of Missouri and elsewhere, the defendants, **AARON VINCENT SCHWEIDLER, MICHAEL G. PETERS, SAMUEL C. MILLER IV, and NICOLE R. LYNE**, aiding and abetting each other and others, did knowingly transfer, possess and use without lawful authority, the means of identification of another person, to wit, the name, social security number and date of birth of J.R., during and in relation to a felony offense, that being access device fraud as charged in Count Six herein.

All in violation of Title 18, United States Code, Section 1028A and Title 18, United States Code, Section 2.

**FORFEITURE ALLEGATION – DRUG TRAFFICKING**

13. The allegations contained in Count One of this Indictment are re-alleged and incorporated by reference for the purpose of alleging a forfeiture to the United States of America of certain property in which the defendants, **AARON VINCENT SCHWEIDLER, MICHAEL G. PETERS, SAMUEL C. MILLER IV, and NICOLE R. LYNE**, have an interest pursuant to the provisions of Title 18, United States Code, Sections 982(a)(1) and Title 21, United States Code, Section 853.

14. Upon conviction of any violation of Title 21, United States Code, Section 841, or conspiracy to commit such violation, the defendants, **AARON VINCENT SCHWEIDLER, MICHAEL G. PETERS, SAMUEL C. MILLER IV, and NICOLE R. LYNE**, shall forfeit to the United States any property, real and personal, constituting, or derived from, proceeds obtained directly or indirectly, as the result of such violations and all property used, or intended to be used, in any manner or part, to commit, and to facilitate the commission of the violations.

15. The property subject to forfeiture includes, but is not limited to the following:
- a. A money judgment in the amount of at least \$2,250,000.

**SUBSTITUTE ASSETS**

16. 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 commingled with other property which cannot be divided without difficulty;

The United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b).

All in accordance with Title 21, United States Code, Section 853, Title 18, United States Code, Sections 982(a)(1), and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

**FORFEITURE ALLEGATION – MONEY LAUNDERING**

17. The allegations contained in Count Two of this Indictment are re-alleged and incorporated by reference for the purpose of alleging a forfeiture to the United States of America of certain property in which the defendants, **AARON VINCENT SCHWEIDLER, MICHAEL G. PETERS, SAMUEL C. MILLER IV, and NICOLE R. LYNE**, have an interest pursuant to the provisions of Title 18, United States Code, Sections 982(a)(1) and Title 21, United States Code, Section 853.

18. Upon conviction of any violation of Title 18, United States Code, Section 1956, or conspiracy to commit such violation, the defendants, **AARON VINCENT SCHWEIDLER, MICHAEL G. PETERS, SAMUEL C. MILLER IV, and NICOLE R. LYNE**, shall forfeit to the United States any property, real or personal, involved in such offense, or any property traceable to such property, pursuant to Title 18, United States Code, Sections 982(a)(1).

19. The property subject to forfeiture includes, but is not limited to the following:
- a. A money judgment in the amount of at least \$2,250,000.

**SUBSTITUTE ASSETS**

20. 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 commingled with other property which cannot be divided without difficulty;

The United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b).

All in accordance with Title 21, United States Code, Section 853, Title 18, United States Code, Sections 982(a)(1), and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

A TRUE BILL.

2/2/16  
DATE

/s/ Laurie A. Payne  
FOREPERSON OF THE GRAND JURY

/s/ Jess E. Michaelsen  
Jess E. Michaelsen, #52253  
Assistant United States Attorney  
Deputy Chief, Narcotics & Violent Crimes Unit  
Western District of Missouri