

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS
(KANSAS CITY DOCKET)

UNITED STATES OF AMERICA,

Plaintiff,

v.

CASE NO. 12-20083-01-35-CM-JPO

LOS ROVELL DAHDA,

a/k/a ERICK CARLOS WALLACE,

a/k/a LIULE (L),

ROOSEVELT RICO DAHDA,

a/k/a DERICK RICO WALLACE,

SADIE JOLYNN BROWN,

JUSTIN CHERIF PICKEL,

a/k/a FRENCHIE,

DAVID JAMES ESSMAN,

a/k/a TINY,

AMOS MOSES HURST,

a/k/a MOSES,

a/k/a CLOWN,

PHILLIP VILLEREAL ALARCON,

JEFFERY DAVID PAIVA,

MARK LEE ROMERO,

SAMUEL VILLEAREAL, III,

PETER PARK,

a/k/a SPIDERMAN,

WAYNE SUHAN SWIFT,

CHARLES THOMAS KREISLER,

a/k/a TOMMY,

JAMES MICHAEL SODERLING,

SIMON ANDREW TYSON,

TRENT JORDAN PERCIVAL,

CHAD WILLIAM POLLARD,

JASON MARCUS HANSEN,

DANIEL MARK SIEBER,

JUSTIN JEROME MERCER,

JACOB PAUL FORBES,

CHAD EUGENE BAUMAN,

CAREY LYNN WILLMING,

MICHAEL SHANE WITT,

STEPHEN MALLSION RECTOR,

MICHAEL J. BERRY,

ADAM CHRISTIANSEN,)
AARON C. GUNDERSON,)
NATHAN WALLACE,)
RYAN KEARNS,)
KARL HAVENER,)
DAMIEN J. MICK,)
JOSHUA SIMPSON,)
SARAH SODERLING,)
and)
ELIZABETH DOMINIQUE WATSON,)
Defendants.)
_____)

SEALED INDICTMENT

The Grand Jury charges that:

COUNT 1

Beginning in or about January 2005 and continuing to on or about June 28, 2012, both dates being approximate and inclusive, in the District of Kansas and elsewhere, the defendants,

**LOS ROVELL DAHDA, a/k/a ERICK CARLOS WALLACE, a/k/a LIULE (L),
ROOSEVELT RICO DAHDA, a/k/a DERICK RICO WALLACE,
SADIE JOLYNN BROWN,
JUSTIN CHERIF PICKEL, a/k/a FRENCHIE,
DAVID JAMES ESSMAN, a/k/a TINY,
AMOS MOSES HURST, a/k/a MOSES, a/k/a CLOWN,
PHILLIP VILLEREAL ALARCON,
JEFFERY DAVID PAIVA,
MARK LEE ROMERO,
SAMUEL VILLEAREAL, III,
PETER PARK, a/k/a SPIDERMAN,
WAYNE SUHAN SWIFT,
CHARLES THOMAS KREISLER, a/k/a TOMMY,
JAMES MICHAEL SODERLING,
SIMON ANDREW TYSON,
TRENT JORDAN PERCIVAL,
CHAD WILLIAM POLLARD,
JASON MARCUS HANSEN,
DANIEL MARK SIEBER,**

**JUSTIN JEROME MERCER,
JACOB PAUL FORBES,
CHAD EUGENE BAUMAN,
CAREY LYNN WILLMING,
MICHAEL SHANE WITT,
STEPHEN MALLSION RECTOR,
MICHAEL J. BERRY,
ADAM CHRISTIANSEN,
AARON C. GUNDERSON,
NATHAN WALLACE,
RYAN KEARNS,
KARL HAVENER,
DAMIEN J. MICK,
JOSHUA SIMPSON,
SARAH SODERLING
and
ELIZABETH DOMINIQUE WATSON,**

knowingly and intentionally conspired and agreed together and with each other, and with other persons known and unknown to the Grand Jury, to commit the following offenses against the United States: to possess with intent to distribute and to distribute five kilograms or more of a mixture and substance containing cocaine, a controlled substance; to possess with intent to distribute and to distribute 1,000 kilograms or more of marijuana, a controlled substance; and maintaining drug-involved premises in Kansas, Missouri and California; all in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A)(ii) and (b)(1)(A)(vii) and 856 and Title 18, United States Code, Section 2.

This was all in violation of Title 21, United States Code, Section 846.

COUNT 2

Beginning on or about March 16, 2009, and continuing to on or about June 13, 2012, both dates being approximate and inclusive, in the District of Kansas and elsewhere, the defendants,

**CHAD EUGENE BAUMAN,
CAREY LYNN WILLMING**

**and
STEPHEN MALLSION RECTOR,**

unlawfully, knowingly and intentionally conspired and agreed together and with each other and with other persons known and unknown to the Grand Jury to commit the following offenses against the United States: knowingly conduct and attempt to conduct multiple monetary transactions, in criminally derived property of a value greater than \$10,000.00, affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is possession with intent to distribute and distribution of cocaine and marijuana, in violation of Title 18, United States Code, Sections 1957; conducting and attempting to conduct financial transactions knowing that the transaction was designed in whole and in part to conceal and disguise, the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity which was possession with intent to distribute and distribution of cocaine and marijuana, 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, Sections 1956(a)(1)(B)(i).

This was all in violation of Title 18, United States Code, Sections 1956(h).

COUNT 3

Beginning in or about January 2005 and continuing to on or about June 28, 2012, both dates being approximate and inclusive, in the District of Kansas and elsewhere, the defendants,

**LOS ROVELL DAHDA, a/k/a ERICK CARLOS WALLACE, a/k/a LIULE (L)
and
CHAD EUGENE BAUMAN,**

unlawfully, knowingly and intentionally, engaged in a continuing criminal enterprise,

together with each other and with other persons known and unknown to the Grand Jury, that is, the distribution and possession with intent to distribute marijuana in violation of Title 21, United States Code, Section 841(a)(1), which are part of a continuing series of violations of Title 21, United States Code, and were undertaken in concert with five or more persons with respect to whom:

**LOS ROVELL DAHDA, a/k/a ERICK CARLOS WALLACE, a/k/a LIULE (L)
and
CHAD EUGENE BAUMAN,**

together with each other and with other persons known and unknown to the Grand Jury, occupied a position of organizer, supervisor and manager over persons known and unknown to the Grand Jury, and that

**LOS ROVELL DAHDA, a/k/a ERICK CARLOS WALLACE, a/k/a LIULE (L)
and
CHAD EUGENE BAUMAN,**

derived substantial income and resources of \$15,000,000.00 and real estate holdings from the continuing criminal enterprise, in violation of Title 21, United States Code, Section 848.

COUNT 4

On or about January 23, 2010, in the District of Kansas, the defendant,

CHAD EUGENE BAUMAN,

knowingly engaged in a monetary transaction affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000.00, that is, exchanged U.S. currency in the amount of \$13,420.00 to The Diamond House in Topeka, Kansas, such property having been derived from a specified unlawful activity, that is, possession with intent to distribute and distribution of cocaine and marijuana, in violation of Title 18, United States Codes, Sections 1957 and 2.

COUNT 5

On or about February 10, 2010, in the District of Kansas, the defendant,

CHAD EUGENE BAUMAN,

knowingly engaged in a monetary transaction by, through and to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000.00, that is, deposited U.S. currency in the amount of \$38,000.00 into the CB Used Car account located at Sunflower Bank, such property having been derived from a specified unlawful activity, that is, possession with intent to distribute and distribution of cocaine and marijuana, in violation of Title 18, United States Codes, Sections 1957 and 2.

COUNT 6

On or about March 15, 2010, in the District of Kansas, the defendant,

CHAD EUGENE BAUMAN,

knowingly engaged in a monetary transaction affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000.00, that is, exchanged U.S. currency in the amount of \$15,740.00 to Automotion in Topeka, Kansas for a vehicle, such property having been derived from a specified unlawful activity, that is, possession with intent to distribute and distribution of cocaine and marijuana, in violation of Title 18, United States Codes, Sections 1957 and 2.

COUNT 7

On or about September 23, 2010, in the District of Kansas, the defendant,

CHAD EUGENE BAUMAN,

knowingly conducted a financial transaction affecting interstate and foreign commerce, to

wit, purchased 7341 SW 23rd Street, Topeka, Kansas, by representing the sale price was \$65,000.00, when in fact the actual sale price was \$115,000.00, which involved the proceeds of a specified unlawful activity, that is, possession with intent to distribute and distribution of cocaine and marijuana, knowing that the transaction was designed in whole and in part to conceal and disguise, the true nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, by making a payment of \$50,000.00 in U.S. currency that was not recorded in the settlement statement to the seller, 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 Sections 1956(a)(1)(B)(i) and 2.

COUNT 8

On or about December 13, 2010, in the District of Kansas, the defendant,

CHAD EUGENE BAUMAN,

knowingly and intentionally possessed with intent to distribute 100 kilograms or more of marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vii), and Title 18, United States Code, Section 2.

COUNT 9

On or about January 28, 2011, in the District of Kansas, the defendants,

**CHAD EUGENE BAUMAN,
RYAN KEARNS
and
KARL HAVENER,**

knowingly and intentionally possessed with intent to distribute and distributed a quantity of marijuana, a controlled substance, within 1,000 feet of the real property comprising

Lawrence High School, a public secondary school, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(D) and 860(a), and Title 18, United States Code, Section 2.

COUNT 10

On or about March 3, 2011, in the District of Kansas, the defendants,

**CHAD EUGENE BAUMAN
and
JOSHUA SIMPSON,**

knowingly and intentionally possessed with intent to distribute marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 11

On or about March 16, 2011, in the District of Kansas, the defendant,

CHAD EUGENE BAUMAN,

knowingly and intentionally possessed with intent to distribute 100 kilograms or more of marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vii), and Title 18, United States Code, Section 2.

COUNT 12

On or about April 7, 2011, in the District of Kansas, the defendant,

CAREY LYNN WILLMING,

knowingly conducted a financial transaction affecting interstate and foreign commerce, to wit, deposited \$8,700.00 in U.S. currency into the account of Fusion Inc., dba Ultimate Tan, located in Lawrence, Kansas, at People's Bank, account XXXX5541, which involved the proceeds of a specified unlawful activity, that is, possession with intent to distribute and

distribution of cocaine and marijuana, knowing that the transaction was designed in whole and in part to conceal and disguise, the true nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, 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, Sections 1956(a)(1)(B)(i) and 2.

COUNT 13

On or about April 20, 2011, in the District of Kansas, the defendant,

CAREY LYNN WILLMING,

knowingly conducted a financial transaction affecting interstate and foreign commerce, to wit, deposited \$4,400.00 in U.S. currency into the account of Fusion Inc., dba Ultimate Tan, located in Lawrence, Kansas, at People's Bank, account XXXX5541, which involved the proceeds of a specified unlawful activity, that is, possession with intent to distribute and distribution of cocaine and marijuana, knowing that the transaction was designed in whole and in part to conceal and disguise, the true nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, 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, Sections 1956(a)(1)(B)(i) and 2.

COUNT 14

On or about April 28, 2011, in the District of Kansas, the defendant,

CAREY LYNN WILLMING,

knowingly conducted a financial transaction affecting interstate and foreign commerce, to

wit, paid \$23,500.00 in U.S. currency for the purchase of Fusion Inc., dba Ultimate Tan, located in Lawrence, Kansas, which involved the proceeds of a specified unlawful activity, that is, possession with intent to distribute and distribution of cocaine and marijuana, knowing that the transaction was designed in whole and in part to conceal and disguise, the true nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, 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, Sections 1956(a)(1)(B)(i) and 2.

COUNT 15

On or about May 12, 2011, in the District of Kansas, the defendant,

CHAD EUGENE BAUMAN,

knowingly and intentionally possessed with intent to distribute marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 16

On or about May 16, 2011, in the District of Kansas, the defendant,

SAMUEL VILLEAREAL, III,

knowingly and intentionally attempted to distribute a quantity of marijuana, a controlled substance, within 1,000 feet of the real property comprising West Middle School, a public elementary school, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(D) and 860(a), and Title 18, United States Code, Section 2.

This was all in violation of Title 21, United States Code, Section 846.

COUNT 17

On or about June 6, 2011, in the District of Kansas, the defendant,

CHAD EUGENE BAUMAN,

knowingly conducted a financial transaction affecting interstate and foreign commerce, to wit, paid \$40,000.00 in U.S. currency to Jetz Service Co., for the purchase of Dosh Industries, LLC to purchase and equip the business, which involved the proceeds of a specified unlawful activity, that is, possession with intent to distribute and distribution of cocaine and marijuana, knowing that the transaction was designed in whole and in part to conceal and disguise, the true nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, 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, Sections 1956(a)(1)(B)(i) and 2.

COUNT 18

On or about June 8, 2011, in the District of Kansas, the defendant,

STEPHEN MALLSION RECTOR,

knowingly conducted a financial transaction affecting interstate and foreign commerce, to wit, paid \$17,000.00 to Jetz Service Co., with check 3626 from US Bank account XXXXXXXX1401, for a portion of the down payment for Dosh Industries, LLC, a landromat owned by Chad Eugene Bauman and Stephen Mallsion Rector, which involved the proceeds of a specified unlawful activity, that is, possession with intent to distribute and distribution of cocaine and marijuana, knowing that the transaction was designed in whole and in part to conceal and disguise, the true nature, location, source, ownership, and

control of the proceeds of said specified unlawful activity, 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, Sections 1956(a)(1)(B)(i) and 2.

COUNT 19

On or about July 5, 2011, in the District of Kansas, the defendant,

CHAD EUGENE BAUMAN,

knowingly conducted a financial transaction affecting interstate and foreign commerce, to wit, deposited \$7,600.00 in cash which was commingled with three other checks into the bank account for Extreme Carpet Cleaning and Restoration at Sunflower Bank, account XXXXXX2439, which involved the proceeds of a specified unlawful activity, that is, possession with intent to distribute and distribution of cocaine and marijuana, knowing that the transaction was designed in whole and in part to conceal and disguise, the true nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, 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, Sections 1956(a)(1)(B)(i) and 2.

COUNT 20

On or about July 21, 2011, in the District of Kansas, the defendant,

CHAD EUGENE BAUMAN,

knowingly and intentionally possessed with intent to distribute 100 kilograms or more of marijuana, a controlled substance, in violation of Title 21, United States Code, Sections

841(a)(1) and 841(b)(1)(B)(vii), and Title 18, United States Code, Section 2.

COUNT 21

On or about July 29, 2011, in the District of Kansas, the defendant,

MICHAEL J. BERRY,

who had been convicted in 2005, of Possession of Cocaine, case number 2005CR695, in the District Court of Wyandotte County, Kansas, a crime punishable under the laws of the State of Kansas by imprisonment for a term exceeding one year, knowingly and unlawfully shipped and transported in interstate and foreign commerce, possessed in and affecting interstate and foreign commerce, and received a firearm, namely, a 5.7 x 28 caliber FN pistol, serial number 386208138, which had been shipped and transported in interstate and/or foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 22

On or about August 23, 2011, in the District of Kansas, the defendants,

**LOS ROVELL DAHDA, a/k/a ERICK CARLOS WALLACE, a/k/a LIULE (L)
and
CHAD EUGENE BAUMAN,**

knowingly and intentionally possessed with intent to distribute marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 23

On or about September 7, 2011, in the District of Kansas, the defendant,

CHAD EUGENE BAUMAN,

knowingly and intentionally possessed with intent to distribute marijuana, a controlled

substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 24

On or about October 24, 2011, in the District of Kansas, the defendant,

CHAD EUGENE BAUMAN,

knowingly and intentionally possessed with intent to distribute 100 kilograms or more of marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vii), and Title 18, United States Code, Section 2.

COUNT 25

On or about November 11, 2011, in the District of Kansas, the defendant,

LOS ROVELL DAHDA, a/k/a ERICK CARLOS WALLACE, a/k/a LIULE (L),

knowingly and intentionally distributed marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 26

On or about November 15, 2011, in the District of Kansas, the defendant,

JAMES MICHAEL SODERLING,

knowingly and intentionally possessed with intent to distribute marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 27

On or about November 15, 2011, in the District of Kansas, the defendant,

JAMES MICHAEL SODERLING,

knowingly and intentionally possessed with intent to distribute a mixture and substance containing methamphetamine, a controlled substance, 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 28

On or about November 15, 2011, in the District of Kansas, the defendant,

JAMES MICHAEL SODERLING,

did knowingly and intentionally open, lease, rent, use, and maintain a place, that is, 505 E. 13th Street, Lawrence, Kansas; and, manage and control, as a lessee and occupant, said place; making it available for use for the purpose of unlawfully storing and distributing marijuana, a controlled substance [a violation of Title 21, United States Code, Section 841(a)(1)], within 1,000 feet of Liberty Memorial Central Middle School, a public elementary school, in violation of Title 21, United States Code, Sections 856(a)(1) & (2) and 860(a) and Title 18, United States Code, Section 2.

COUNT 29

On or about November 16, 2011, in the District of Kansas, the defendants,

LOS ROVELL DAHDA, a/k/a ERICK CARLOS WALLACE, a/k/a LIULE (L)

and

JUSTIN CHERIF PICKEL, a/k/a FRENCHIE,

did knowingly and intentionally open, lease, rent, use, and maintain a place, that is, 119 Pawnee, Lawrence, Kansas; and, manage and control, as a lessee and occupant, said place; making it available for use for the purpose of unlawfully storing and distributing marijuana, a controlled substance [a violation of Title 21, United States Code, Section 841(a)(1)], in violation of Title 21, United States Code, Sections 856(a)(1) & (2) and Title

18, United States Code, Section 2.

COUNT 30

On or about November 16, 2011, in the District of Kansas, the defendant,
LOS ROVELL DAHDA, a/k/a ERICK CARLOS WALLACE, a/k/a LIULE (L),
did knowingly and intentionally open, lease, rent, use, and maintain a place, that is, Gran-Daddy's BBQ, 1147 W. 23rd Street, Lawrence, Kansas; and, manage and control, as a lessee and occupant, said place; making it available for use for the purpose of unlawfully storing and distributing marijuana, a controlled substance [a violation of Title 21, United States Code, Section 841(a)(1)], in violation of Title 21, United States Code, Sections 856(a)(1) & (2) and Title 18, United States Code, Section 2.

COUNT 31

On or about November 16, 2011, in the District of Kansas, the defendant,
LOS ROVELL DAHDA, a/k/a ERICK CARLOS WALLACE, a/k/a LIULE (L),
knowingly and intentionally distributed marijuana, a controlled substance, within 1,000 feet of the real property comprising Haskell Indian Nations University, a university, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(D) and 860(a), and Title 18, United States Code, Section 2.

COUNT 32

On or about November 28, 2011, in the District of Kansas, the defendant,
CHAD EUGENE BAUMAN,
knowingly and intentionally possessed with intent to distribute 100 kilograms or more of marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vii), and Title 18, United States Code, Section 2.

COUNT 33

On or about November 30, 2011, in the District of Kansas, the defendant,
LOS ROVELL DAHDA, a/k/a ERICK CARLOS WALLACE, a/k/a LIULE (L),
knowingly and intentionally distributed marijuana, a controlled substance, within 1,000 feet
of the real property comprising Haskell Indian Nations University, a university, in violation
of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(D) and 860(a), and Title 18,
United States Code, Section 2.

COUNT 34

On or about December 29, 2011, in the District of Kansas, the defendant,
CHAD EUGENE BAUMAN,
knowingly and intentionally possessed with intent to distribute marijuana, a controlled
substance, in violation of Title 21, United States Code, Sections 841(a)(1) and
841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 35

On or about January 6, 2012, in the District of Kansas, the defendant,
LOS ROVELL DAHDA, a/k/a ERICK CARLOS WALLACE, a/k/a LIULE (L),
knowingly and intentionally distributed marijuana, a controlled substance, in violation of
Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United
States Code, Section 2.

COUNT 36

On or about January 19, 2012, in the District of Kansas and elsewhere, the
defendants,
LOS ROVELL DAHDA, a/k/a ERICK CARLOS WALLACE, a/k/a LIULE (L)
and

JUSTIN CHERIF PICKEL, a/k/a FRENCHIE,

knowingly and intentionally used a communication facility, a cellular telephone, in committing, causing, and facilitating the offense set forth in Count 1 of this indictment incorporated by reference herein, in violation of Title 21, United States Code, Section 843(b).

COUNT 37

On or about January 19, 2012, in the District of Kansas and elsewhere, the defendants,

**LOS ROVELL DAHDA, a/k/a ERICK CARLOS WALLACE, a/k/a LIULE (L)
and
DAVID JAMES ESSMAN, a/k/a TINY,**

knowingly and intentionally used a communication facility, a cellular telephone, in committing, causing, and facilitating the offense set forth in Count 1 of this indictment incorporated by reference herein, in violation of Title 21, United States Code, Section 843(b).

COUNT 38

On or about January 24, 2012, in the District of Kansas and elsewhere, the defendants,

**LOS ROVELL DAHDA, a/k/a ERICK CARLOS WALLACE, a/k/a LIULE (L)
and
PHILLIP VILLEREAL ALARCON,**

knowingly and intentionally used a communication facility, a cellular telephone, in committing, causing, and facilitating the offense set forth in Count 1 of this indictment incorporated by reference herein, in violation of Title 21, United States Code, Section 843(b).

COUNT 39

On or about January 26, 2012, in the District of Kansas, the defendant,

CHAD EUGENE BAUMAN,

knowingly and intentionally possessed with intent to distribute marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 40

On or about January 28, 2012, in the District of Kansas and elsewhere, the defendants,

LOS ROVELL DAHDA, a/k/a ERICK CARLOS WALLACE, a/k/a LIULE (L)

and

AMOS MOSES HURST, a/k/a MOSES, a/k/a CLOWN,

knowingly and intentionally used a communication facility, a cellular telephone, in committing, causing, and facilitating the offense set forth in Count 1 of this indictment incorporated by reference herein, in violation of Title 21, United States Code, Section 843(b).

COUNT 41

On or about January 29, 2012, in the District of Kansas and elsewhere, the defendants,

LOS ROVELL DAHDA, a/k/a ERICK CARLOS WALLACE, a/k/a LIULE (L)

and

ROOSEVELT RICO DAHDA, a/k/a DERICK RICO WALLACE,

knowingly and intentionally used a communication facility, a cellular telephone, in committing, causing, and facilitating the offense set forth in Count 1 of this indictment incorporated by reference herein, in violation of Title 21, United States Code, Section

843(b).

COUNT 42

Beginning on or about January 29, 2012 and continuing to on or about February 13, 2012, both dates being approximate and inclusive, in the District of Kansas and elsewhere, the defendants,

**LOS ROVELL DAHDA, a/k/a ERICK CARLOS WALLACE, a/k/a LIULE (L),
ROOSEVELT RICO DAHDA, a/k/a DERICK RICO WALLACE,
SADIE JOLYNN BROWN,
JUSTIN CHERIF PICKEL, a/k/a FRENCHIE,
AMOS MOSES HURST, a/k/a MOSES, a/k/a CLOWN,
PHILLIP VILLEREAL ALARCON,
JEFFERY DAVID PAIVA,
PETER PARK, a/k/a SPIDERMAN,
WAYNE SUHAN SWIFT
and
NATHAN WALLACE,**

knowingly and intentionally possessed with intent to distribute marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 43

Between on or about January 1, 2012 and on or about February 29, 2012, the exact date being unknown, in the District of Kansas, the defendant,

CHAD EUGENE BAUMAN,

knowingly conducted a financial transaction affecting interstate and foreign commerce, to wit, transferred \$40,000.00 in U.S. currency to B.J., which involved the proceeds of a specified unlawful activity, that is, possession with intent to distribute and distribution of cocaine and marijuana, knowing that the transaction was designed in whole and in part to conceal and disguise, the true nature, location, source, ownership, and control of the

proceeds of said specified unlawful activity, 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 Sections 1956(a)(1)(B)(i) and 2.

COUNT 44

On or about February 2, 2012, in the District of Kansas and elsewhere, the defendants,

**LOS ROVELL DAHDA, a/k/a ERICK CARLOS WALLACE, a/k/a LIULE (L)
and
ROOSEVELT RICO DAHDA, a/k/a DERICK RICO WALLACE,**

knowingly and intentionally used a communication facility, a cellular telephone, in committing, causing, and facilitating the offense set forth in Count 1 of this indictment incorporated by reference herein, in violation of Title 21, United States Code, Section 843(b).

COUNT 45

On or about February 2, 2012, in the District of Kansas and elsewhere, the defendants,

**LOS ROVELL DAHDA, a/k/a ERICK CARLOS WALLACE, a/k/a LIULE (L)
and
PHILLIP VILLEREAL ALARCON,**

knowingly and intentionally used a communication facility, a cellular telephone, in committing, causing, and facilitating the offense set forth in Count 1 of this indictment incorporated by reference herein, in violation of Title 21, United States Code, Section 843(b).

COUNT 46

On or about February 17, 2012, in the District of Kansas, the defendants,

**ROOSEVELT RICO DAHDA, a/k/a DERICK RICO WALLACE
and
MARK LEE ROMERO,**

knowingly and intentionally possessed with intent to distribute and distributed a quantity of marijuana, a controlled substance, within 1,000 feet of the real property comprising Holcomb Sports Complex, a playground, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(D) and 860(a), and Title 18, United States Code, Section 2.

COUNT 47

On or about February 18, 2012, in the District of Kansas and elsewhere, the defendants,

**LOS ROVELL DAHDA, a/k/a ERICK CARLOS WALLACE, a/k/a LIULE (L)
and
NATHAN WALLACE,**

knowingly and intentionally used a communication facility, a cellular telephone, in committing, causing, and facilitating the offense set forth in Count 1 of this indictment incorporated by reference herein, in violation of Title 21, United States Code, Section 843(b).

COUNT 48

On or about February 21, 2012, in the District of Kansas, the defendants,

**LOS ROVELL DAHDA, a/k/a ERICK CARLOS WALLACE, a/k/a LIULE (L),
ROOSEVELT RICO DAHDA, a/k/a DERICK RICO WALLACE
PETER PARK, a/k/a SPIDERMAN
and
NATHAN WALLACE,**

knowingly and intentionally possessed with intent to distribute and distributed a quantity

of marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 49

On or about February 27, 2012, in the District of Kansas, the defendant,

CHAD EUGENE BAUMAN,

knowingly and intentionally possessed with intent to distribute marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 50

On or about March 9, 2012, in the District of Kansas, the defendant,

CHAD EUGENE BAUMAN,

knowingly and intentionally possessed with intent to distribute 100 kilograms or more of marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vii), and Title 18, United States Code, Section 2.

COUNT 51

On or about March 14, 2012, in the District of Kansas and elsewhere, the defendants,

**ROOSEVELT RICO DAHDA, a/k/a DERICK RICO WALLACE
and
SAMUEL VILLEAREAL, III,**

knowingly and intentionally used a communication facility, a cellular telephone, in committing, causing, and facilitating the offense set forth in Count 1 of this indictment incorporated by reference herein, in violation of Title 21, United States Code, Section 843(b).

COUNT 52

On or about March 16, 2012, in the District of Kansas and elsewhere, the defendants,

**ROOSEVELT RICO DAHDA, a/k/a DERICK RICO WALLACE
and
SADIE JOLYNN BROWN,**

knowingly and intentionally used a communication facility, a cellular telephone, in committing, causing, and facilitating the offense set forth in Count 1 of this indictment incorporated by reference herein, in violation of Title 21, United States Code, Section 843(b).

COUNT 53

On or about March 18, 2012, in the District of Kansas and elsewhere, the defendants,

**SADIE JOLYNN BROWN
and
MARK LEE ROMERO,**

knowingly and intentionally used a communication facility, a cellular telephone, in committing, causing, and facilitating the offense set forth in Count 1 of this indictment incorporated by reference herein, in violation of Title 21, United States Code, Section 843(b).

COUNT 54

On or about March 18, 2012, in the District of Kansas and elsewhere, the defendants,

**ROOSEVELT RICO DAHDA, a/k/a DERICK RICO WALLACE
and
SADIE JOLYNN BROWN,**

knowingly and intentionally used a communication facility, a cellular telephone, in committing, causing, and facilitating the offense set forth in Count 1 of this indictment incorporated by reference herein, in violation of Title 21, United States Code, Section 843(b).

COUNT 55

On or about March 18, 2012, in the District of Kansas, the defendants,

**ROOSEVELT RICO DAHDA, a/k/a DERICK RICO WALLACE,
SADIE JOLYNN BROWN
and
MARK LEE ROMERO,**

knowingly and intentionally possessed with intent to distribute and distributed a quantity of marijuana, a controlled substance, within 1,000 feet of the real property comprising Holcomb Sports Complex, a playground, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(D) and 860(a), and Title 18, United States Code, Section 2.

COUNT 56

On or about March 26, 2012, in the District of Kansas, the defendants,

**CHAD EUGENE BAUMAN
and
STEPHEN MALLSION RECTOR,**

knowingly and intentionally attempted to possess with intent distribute marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

This was all in violation of Title 21, United States Code, Section 846.

COUNT 57

On or about March 28, 2012, in the District of Kansas, the defendants,

CHAD EUGENE BAUMAN

**and
CAREY LYNN WILLMING,**

did knowingly and intentionally open, lease, rent, use, and maintain a place, that is, 4921 Wakarusa Court, Unit 312, Lawrence, Kansas; and, manage and control, as a lessee and occupant, said place; making it available for use for the purpose of unlawfully storing and distributing marijuana, a controlled substance [a violation of Title 21, United States Code, Section 841(a)(1)], in violation of Title 21, United States Code, Sections 856(a)(1) & (2) and Title 18, United States Code, Section 2.

COUNT 58

On or about March 28, 2012, in the District of Kansas, the defendants,

**CHAD EUGENE BAUMAN,
and
MICHAEL SHANE WITT,**

knowingly and intentionally possessed with intent to distribute and distributed a quantity of marijuana, a controlled substance, within 1,000 feet of the real property comprising Olathe North High School, a public secondary school, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(D) and 860(a), and Title 18, United States Code, Section 2.

COUNT 59

On or about March 28, 2012, in the District of Kansas, the defendant,

JACOB PAUL FORBES,

knowingly and intentionally possessed with intent to distribute and distributed marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 60

On or about March 29, 2012, in the District of Kansas, the defendant,

CHAD EUGENE BAUMAN,

knowingly and intentionally possessed with intent to distribute marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 61

On or about March 30, 2012, in the District of Kansas, the defendant,

CHAD EUGENE BAUMAN,

knowingly and intentionally possessed with intent to distribute marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 62

On or about March 30, 2012, in the District of Kansas, the defendants,

CHAD EUGENE BAUMAN

and

DAMIEN J. MICK,

did knowingly and intentionally open, lease, rent, use, and maintain a place, that is, 2609 Merriam Lane, Kansas City, Kansas; and, manage and control, as a lessee and occupant, said place; making it available for use for the purpose of unlawfully storing and distributing marijuana, a controlled substance [a violation of Title 21, United States Code, Section 841(a)(1)], in violation of Title 21, United States Code, Sections 856(a)(1) & (2) and Title 18, United States Code, Section 2.

COUNT 63

On or about April 9, 2012, in the District of Kansas and elsewhere, the defendants,

**PETER PARK, a/k/a SPIDERMAN
and
WAYNE SUHAN SWIFT,**

knowingly and intentionally used a communication facility, a cellular telephone, in committing, causing, and facilitating the offense set forth in Count 1 of this indictment incorporated by reference herein, in violation of Title 21, United States Code, Section 843(b).

COUNT 64

On or about April 9, 2012, in the District of Kansas and elsewhere, the defendants,

**PETER PARK, a/k/a SPIDERMAN
and
JACOB PAUL FORBES,**

knowingly and intentionally used a communication facility, a cellular telephone, in committing, causing, and facilitating the offense set forth in Count 1 of this indictment incorporated by reference herein, in violation of Title 21, United States Code, Section 843(b).

COUNT 65

On or about April 15, 2012, in the District of Kansas and elsewhere, the defendants,

**PETER PARK, a/k/a SPIDERMAN
and
SIMON ANDREW TYSON,**

knowingly and intentionally used a communication facility, a cellular telephone, in committing, causing, and facilitating the offense set forth in Count 1 of this indictment incorporated by reference herein, in violation of Title 21, United States Code, Section 843(b).

COUNT 66

On or about April 20, 2012, in the District of Kansas and elsewhere, the defendants,

**PETER PARK, a/k/a SPIDERMAN
and
CHARLES THOMAS KREISLER, a/k/a TOMMY,**

knowingly and intentionally used a communication facility, a cellular telephone, in committing, causing, and facilitating the offense set forth in Count 1 of this indictment incorporated by reference herein, in violation of Title 21, United States Code, Section 843(b).

COUNT 67

On or about April 20, 2012, in the District of Kansas, the defendants,

**PETER PARK, a/k/a SPIDERMAN,
WAYNE SUHAN SWIFT
CHARLES THOMAS KREISLER, a/k/a TOMMY
and
JAMES MICHAEL SODERLING,**

knowingly and intentionally possessed with intent to distribute marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 68

On or about April 20, 2012, in the District of Kansas, the defendant,

PETER PARK, a/k/a SPIDERMAN,

did knowingly and intentionally open, lease, rent, use, and maintain a place, that is, 4521 Metropolitan, Kansas City, Kansas; and, manage and control, as a lessee and occupant, said place; making it available for use for the purpose of unlawfully storing and distributing marijuana, a controlled substance [a violation of Title 21, United States Code, Section

841(a)(1)], in violation of Title 21, United States Code, Sections 856(a)(1) & (2) and Title 18, United States Code, Section 2.

COUNT 69

On or about April 24, 2012, in the District of Kansas and elsewhere, the defendants,

**ROOSEVELT RICO DAHDA, a/k/a DERICK RICO WALLACE
and
JUSTIN CHERIF PICKEL, a/k/a FRENCHIE,**

knowingly and intentionally used a communication facility, a cellular telephone, in committing, causing, and facilitating the offense set forth in Count 1 of this indictment incorporated by reference herein, in violation of Title 21, United States Code, Section 843(b).

COUNT 70

On or about April 24, 2012, in the District of Kansas and elsewhere, the defendants,

**PETER PARK, a/k/a SPIDERMAN
and
JAMES MICHAEL SODERLING,**

knowingly and intentionally used a communication facility, a cellular telephone, in committing, causing, and facilitating the offense set forth in Count 1 of this indictment incorporated by reference herein, in violation of Title 21, United States Code, Section 843(b).

COUNT 71

On or about April 24, 2012, in the District of Kansas and elsewhere, the defendants,

**PETER PARK, a/k/a SPIDERMAN
and
ELIZABETH DOMINIQUE WATSON,**

knowingly and intentionally possessed with intent to distribute and distributed marijuana,

a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 72

On or about April 26, 2012, in the District of Kansas and elsewhere, the defendants,

**LOS ROVELL DAHDA, a/k/a ERICK CARLOS WALLACE, a/k/a LIULE (L),
ROOSEVELT RICO DAHDA, a/k/a DERICK RICO WALLACE
and
JUSTIN CHERIF PICKEL, a/k/a FRENCHIE,**

knowingly and intentionally attempted to possess with intent to distribute marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

This was all in violation of Title 21, United States Code, Section 846.

COUNT 73

On or about April 26, 2012, in the District of Kansas and elsewhere, the defendants,

**PETER PARK, a/k/a SPIDERMAN
and
ELIZABETH DOMINIQUE WATSON,**

knowingly and intentionally used a communication facility, a cellular telephone, in committing, causing, and facilitating the offense set forth in Count 1 of this indictment incorporated by reference herein, in violation of Title 21, United States Code, Section 843(b).

COUNT 74

On or about April 30, 2012, in the District of Kansas, the defendants,

**PETER PARK, a/k/a SPIDERMAN
and
DANIEL MARK SIEBER,**

knowingly and intentionally possessed with intent to distribute and distributed marijuana,

a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 75

On or about May 1, 2012, in the District of Kansas and elsewhere, the defendants,

**PETER PARK, a/k/a SPIDERMAN
and
JASON MARCUS HANSEN,**

knowingly and intentionally used a communication facility, a cellular telephone, in committing, causing, and facilitating the offense set forth in Count 1 of this indictment incorporated by reference herein, in violation of Title 21, United States Code, Section 843(b).

COUNT 76

On or about May 4, 2012, in the District of Kansas, the defendant,

CHAD EUGENE BAUMAN,

knowingly engaged in a monetary transaction affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000.00, that is, exchanged U.S. currency in the amount of \$59,864.00 to Twin Motors Ford in Iola, Kansas for a vehicle, that is a 2012 Ford F-450 truck, such property having been derived from a specified unlawful activity, that is, possession with intent to distribute and distribution of cocaine and marijuana, in violation of Title 18, United States Codes, Sections 1957 and 2.

COUNT 77

On or about May 5, 2012, in the District of Kansas, the defendants,

**PETER PARK, a/k/a SPIDERMAN,
WAYNE SUHAN SWIFT,
CHARLES THOMAS KREISLER, a/k/a TOMMY
and**

JAMES MICHAEL SODERLING,

knowingly and intentionally possessed with intent to distribute and distributed marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 78

On or about May 7, 2012, in the District of Kansas and elsewhere, the defendants,

**PETER PARK, a/k/a SPIDERMAN
and
TRENT JORDAN PERCIVAL,**

knowingly and intentionally used a communication facility, a cellular telephone, in committing, causing, and facilitating the offense set forth in Count 1 of this indictment incorporated by reference herein, in violation of Title 21, United States Code, Section 843(b).

COUNT 79

On or about May 7, 2012, in the District of Kansas, the defendants,

**PETER PARK, a/k/a SPIDERMAN,
TRENT JORDAN PERCIVAL
and
CHAD WILLIAM POLLARD,**

knowingly and intentionally possessed with intent to distribute and distributed marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 80

On or about May 11, 2012, in the District of Kansas, the defendants,

**PETER PARK, a/k/a SPIDERMAN,
TRENT JORDAN PERCIVAL,
CHAD WILLIAM POLLARD**

**and
JUSTIN JEROME MERCER,**

knowingly and intentionally possessed with intent to distribute and distributed marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 81

On or about May 14, 2012, in the District of Kansas and elsewhere, the defendants,

**PETER PARK, a/k/a SPIDERMAN
and
JUSTIN JEROME MERCER,**

knowingly and intentionally used a communication facility, a cellular telephone, in committing, causing, and facilitating the offense set forth in Count 1 of this indictment incorporated by reference herein, in violation of Title 21, United States Code, Section 843(b).

COUNT 82

On or about May 14, 2012, in the District of Kansas, the defendants,

**PETER PARK, a/k/a SPIDERMAN
and
JUSTIN JEROME MERCER,**

knowingly and intentionally possessed with intent to distribute and distributed marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 83

On or about May 14, 2012, in the District of Kansas, the defendants,

**PETER PARK, a/k/a SPIDERMAN,
TRENT JORDAN PERCIVAL
and**

CHAD WILLIAM POLLARD,

knowingly and intentionally possessed with intent to distribute and distributed marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 84

On or about May 17, 2012, in the District of Kansas, the defendants,

**LOS ROVELL DAHDA, a/k/a ERICK CARLOS WALLACE, a/k/a LIULE (L),
PETER PARK, a/k/a SPIDERMAN
WAYNE SUHAN SWIFT,
and
JAMES MICHAEL SODERLING**

knowingly and intentionally possessed with intent to distribute and distributed marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 85

On or about May 22, 2012, in the District of Kansas, the defendants,

**PETER PARK, a/k/a SPIDERMAN
and
JAMES MICHAEL SODERLING,**

knowingly and intentionally possessed with intent to distribute and distributed marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 86

On or about May 22, 2012, in the District of Kansas and elsewhere, the defendants,

**PETER PARK, a/k/a SPIDERMAN
and
WAYNE SUHAN SWIFT,**

knowingly and intentionally used a communication facility, a cellular telephone, in committing, causing, and facilitating the offense set forth in Count 1 of this indictment incorporated by reference herein, in violation of Title 21, United States Code, Section 843(b).

COUNT 87

On or about May 22, 2012, in the District of Kansas and elsewhere, the defendants,

**LOS ROVELL DAHDA, a/k/a ERICK CARLOS WALLACE, a/k/a LIULE (L),
PETER PARK, a/k/a SPIDERMAN
and
WAYNE SUHAN SWIFT,**

knowingly and intentionally attempted to possess with intent to distribute marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

This was all in violation of Title 21, United States Code, Section 846.

COUNT 88

On or about May 23, 2012, in the District of Kansas, the defendants,

**PETER PARK, a/k/a SPIDERMAN
and
DANIEL MARK SIEBER,**

knowingly and intentionally possessed with intent to distribute and distributed marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 89

On or about May 30, 2012, in the District of Kansas, the defendants,

**PETER PARK, a/k/a SPIDERMAN
and
JASON MARCUS HANSEN,**

knowingly and intentionally possessed with intent to distribute and distributed marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 90

On or about May 30, 2012, in the District of Kansas, the defendants,

**PETER PARK, a/k/a SPIDERMAN
and
DANIEL MARK SIEBER,**

knowingly and intentionally possessed with intent to distribute and distributed marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 91

On or about June 6, 2012, in the District of Kansas, the defendants,

**PETER PARK, a/k/a SPIDERMAN
and
DANIEL MARK SIEBER,**

knowingly and intentionally possessed with intent to distribute and distributed marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 92

On or about June 11, 2012, in the District of Kansas, the defendants,

**CHAD EUGENE BAUMAN
and
AARON C. GUNDERSON,**

did knowingly and intentionally open, lease, rent, use, and maintain a place, that is, 321J Forbes Field, Topeka, Kansas; and, manage and control, as a lessee and occupant, said

place; making it available for use for the purpose of unlawfully storing and distributing marijuana, a controlled substance [a violation of Title 21, United States Code, Section 841(a)(1)], in violation of Title 21, United States Code, Sections 856(a)(1) & (2) and Title 18, United States Code, Section 2.

COUNT 93

On or about June 12, 2012, in the District of Kansas and elsewhere, the defendants,

**PETER PARK, a/k/a SPIDERMAN,
JAMES MICHAEL SODERLING
and
SARAH SODERLING,**

knowingly and intentionally attempted to possess with intent to distribute marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

This was all in violation of Title 21, United States Code, Section 846.

COUNT 94

On or about June 13, 2012, in the District of Kansas, the defendants,

**CHAD EUGENE BAUMAN
and
DAMIEN J. MICK,**

did knowingly and intentionally open, lease, rent, use, and maintain a place, that is, 2418/2420 Merriam Lane, Kansas City, Kansas; and, manage and control, as a lessee and occupant, said place; making it available for use for the purpose of unlawfully storing and distributing marijuana, a controlled substance [a violation of Title 21, United States Code, Section 841(a)(1)], in violation of Title 21, United States Code, Sections 856(a)(1) & (2) and Title 18, United States Code, Section 2.

COUNT 95

On or about June 13, 2012, in the District of Kansas, the defendant,

TRENT JORDAN PERCIVAL,

knowingly, intentionally and unlawfully possessed firearms, that is, a .45 caliber ACP Taurus pistol, Model 24/7, serial number NYD82719; a 12 gauge Mossberg shotgun, serial number T4562435; and, a .357 caliber Rossi revolver, serial number CP773840; in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, conspiracy to possess with intent to distribute and to distribute marijuana, in violation of Title 18, United States Code, Section 924(c).

COUNT 96

On or about June 13, 2012, in the District of Kansas, the defendant,

TRENT JORDAN PERCIVAL,

who is an unlawful user of a controlled substance, knowingly and unlawfully shipped and transported in interstate and foreign commerce, possessed in and affecting interstate and foreign commerce, and received firearms, namely, a .45 caliber ACP Taurus pistol, Model 24/7, serial number NYD82719; a 12 gauge Mossberg shotgun, serial number T4562435; a .357 caliber Rossi revolver, serial number CP773840; a .22 caliber LR GSG-5P rifle, serial number A30421; a 9mm Springfield Armory pistol, Model XP9, serial number US859024; a .308 caliber Springfield Armory rifle, Model M1A, serial number 114766; a 12 gauge Browning shotgun, Model Goldfinger, serial number 113MZ14281; a .22 caliber LR Smith & Wesson rifle, Model M&P 15-22, serial number DUU5907; a 5.56mm Rock River Arms rifle, Model LAR-15, serial number KT1060-28; and, a .22 caliber Smith & Wesson revolver, Model Singe-Six, serial number 264-47754; and, ammunition; which had

been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(2).

COUNT 97

On or about June 13, 2012, in the District of Kansas, the defendant,

DANIEL MARK SIEBER,

knowingly and intentionally possessed with intent to distribute marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 98

On or about June 13, 2012, in the District of Kansas, the defendant,

MICHAEL J. BERRY,

who had been convicted in 2005, of Possession of Cocaine, case number 2005CR695, in the District Court of Wyandotte County, Kansas, a crime punishable under the laws of the State of Kansas by imprisonment for a term exceeding one year, knowingly and unlawfully shipped and transported in interstate and foreign commerce, possessed in and affecting interstate and foreign commerce, and received ammunition and firearms, namely, a .45 caliber Glock pistol, Model 30, serial number SKA490; a 5.56mm Kel Tec pistol, Model PLR-16, serial number P1X49; and, a 5.7 x 28 caliber FN pistol, Model Five-Seven, serial number 386221208; which had been shipped and transported in interstate and/or foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 99

On or about June 13, 2012, in the District of Kansas, the defendant,

NATHAN WALLACE,

knowingly and intentionally possessed with intent to distribute a quantity of marijuana, a controlled substance, within 1,000 feet of the real property comprising New York Elementary School, a public elementary school, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(D) and 860(a), and Title 18, United States Code, Section 2.

COUNT 100

On or about June 13, 2012, in the District of Kansas, the defendant,

PETER PARK, a/k/a SPIDERMAN,

knowingly, intentionally and unlawfully possessed firearms, that is, a .45 caliber Springfield Armory pistol, Model XD-45ACP, serial number US609848; a .40 caliber Glock pistol, Model 23, serial number PX763; a 5.56 caliber Herstal Belgium rifle, Model Bulpup FS2000, serial number 026226; and, a 12 gauge Remington shotgun, Model 870 express magnum, serial number A165942M; in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, conspiracy to possess with intent to distribute and to distribute marijuana, in violation of Title 18, United States Code, Section 924(c).

COUNT 101

On or about June 28, 2012, in the District of Kansas, the defendants,

**CHAD EUGENE BAUMAN
and
AARON C. GUNDERSON,**

knowingly and intentionally possessed with intent to distribute 100 kilograms or more of marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vii), and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

1. The allegations contained in Counts 1 through 101 of the Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

FORFEITURE NOTICE - FIREARMS VIOLATIONS

2. Upon conviction of the offenses identified in Counts 21, 95-96, 98, and 100, the defendants,

**LOS ROVELL DAHDA, a/k/a ERICK CARLOS WALLACE, a/k/a LIULE (L),
ROOSEVELT RICO DAHDA, a/k/a DERICK RICO WALLACE,
SADIE JOLYNN BROWN,
JUSTIN CHERIF PICKEL, a/k/a FRENCHIE,
DAVID JAMES ESSMAN, a/k/a TINY,
AMOS MOSES HURST, a/k/a MOSES, a/k/a CLOWN,
PHILLIP VILLEREAL ALARCON,
JEFFERY DAVID PAIVA,
MARK LEE ROMERO,
SAMUEL VILLEAREAL, III,
PETER PARK, a/k/a SPIDERMAN,
WAYNE SUHAN SWIFT,
CHARLES THOMAS KREISLER, a/k/a TOMMY,
JAMES MICHAEL SODERLING,
SIMON ANDREW TYSON,
TRENT JORDAN PERCIVAL,
CHAD WILLIAM POLLARD,
JASON MARCUS HANSEN,
DANIEL MARK SIEBER,
JUSTIN JEROME MERCER,
JACOB PAUL FORBES,
CHAD EUGENE BAUMAN,
CAREY LYNN WILLMING,
MICHAEL SHANE WITT,
STEPHEN MALLSION RECTOR,
MICHAEL J. BERRY,
ADAM CHRISTIANSEN,
AARON C. GUNDERSON,
NATHAN WALLACE,
RYAN KEARNS,**

**KARL HAVENER,
DAMIEN J. MICK,
JOSHUA SIMPSON,
SARAH SODERLING
and
ELIZABETH DOMINIQUE WATSON,**

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved the commission of the offenses, including, but not limited to the following:

- a. a .45 caliber ACP Taurus pistol, Model 24/7, serial number NYD82719;
- b. a 12 gauge Mossberg shotgun, serial number T4562435;
- c. a .357 caliber Rossi revolver, serial number CP773840;
- d. a .22 caliber LR GSG-5P rifle, serial number A30421;
- e. a 9mm Springfield Armory pistol, Model XP9, serial number US859024;
- f. a .308 caliber Springfield Armory rifle, Model M1A, serial number 114766;
- g. a 12 gauge Browning shotgun, Model Goldfinger, serial number 113MZ14281;
- h. a .22 caliber LR Smith & Wesson rifle, Model M&P 15-22, serial number DUU5907;
- i. a 5.56mm Rock River Arms rifle, Model LAR-15, serial number KT1060-28;
- j. a .22 caliber Smith & Wesson revolver, Model Singe-Six, serial number 264-47754;
- k. a .45 caliber Springfield Armory pistol, Model XD-45ACP, serial number US609848;
- l. a .40 caliber Glock pistol, Model 23, serial number PX763;
- m. a 5.56 caliber Herstal Belgium rifle, Model Bulpup FS2000, serial number 026226;
- n. a 12 gauge Remington shotgun, Model 870 express magnum, serial number A165942M;
- o. 5.7 x 28 caliber FN pistol, serial number 386208138;
- p. a .45 caliber Glock pistol, Model 30, serial number SKA490;
- q. a 5.56mm Kel Tec pistol, Model PLR-16, serial number P1X49;
- r. a 5.7 x 28 caliber FN pistol, Model Five-Seven, serial number 386221208;
and,
- s. all ammunition seized in connection with this investigation.

All pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

FORFEITURE NOTICE - CONTROLLED SUBSTANCES VIOLATIONS

3. The allegations contained in Counts 1 through 101 of the Indictment are re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to the provisions of Title 21, United States Code, Sections 853(a)(1), 853(a)(2) and 853(p) and Title 18, United States Code, Section 982(a)(1) and Rule 32.2(a).

4. Upon conviction of the offenses identified in Counts 1, 2-20, 22-35, 39, 42-43, 46, 48-50, 55-62, 67-68, 71-72, 74, 76, 77, 79-80, 82-85, 87-94, 97, 99 and 101, the defendants,

**LOS ROVELL DAHDA, a/k/a ERICK CARLOS WALLACE, a/k/a LIULE (L),
ROOSEVELT RICO DAHDA, a/k/a DERICK RICO WALLACE,
SADIE JOLYNN BROWN,
JUSTIN CHERIF PICKEL, a/k/a FRENCHIE,
DAVID JAMES ESSMAN, a/k/a TINY,
AMOS MOSES HURST, a/k/a MOSES, a/k/a CLOWN,
PHILLIP VILLEREAL ALARCON,
JEFFERY DAVID PAIVA,
MARK LEE ROMERO,
SAMUEL VILLEAREAL, III,
PETER PARK, a/k/a SPIDERMAN,
WAYNE SUHAN SWIFT,
CHARLES THOMAS KREISLER, a/k/a TOMMY,
JAMES MICHAEL SODERLING,
SIMON ANDREW TYSON,
TRENT JORDAN PERCIVAL,
CHAD WILLIAM POLLARD,
JASON MARCUS HANSEN,
DANIEL MARK SIEBER,
JUSTIN JEROME MERCER,
JACOB PAUL FORBES,
CHAD EUGENE BAUMAN,
CAREY LYNN WILLMING,
MICHAEL SHANE WITT,
STEPHEN MALLSION RECTOR,
MICHAEL J. BERRY,
ADAM CHRISTIANSEN,
AARON C. GUNDERSON,
NATHAN WALLACE,
RYAN KEARNS,**

**KARL HAVENER,
DAMIEN J. MICK,
JOSHUA SIMPSON,
SARAH SODERLING
and
ELIZABETH DOMINIQUE WATSON,**

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853 any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense. The property to be forfeited includes, but not limited to the following:

A. MONEY JUDGMENT

A sum of money equal to \$16,985,250.00 in United States currency, representing the amount of proceeds obtained as a result of the offenses of conspiracy to distribute cocaine and marijuana and distribution of cocaine and marijuana, which are controlled substances, in violation of title 21, United States Code, Section 841(a)(1), for which the defendants are jointly and severally liable.

B. REAL PROPERTY

All lots or parcels of land, together with their buildings, appurtenances, improvements, fixtures, attachments and easements, at the addresses listed and described below:

- (1) A tract of land located in the South Half of the Southwest Quarter of Section 27, Township 12 South, Range 18 East of the 6th P.M., in Douglas County, Kansas, more particularly described as follows:

Beginning at the Northeast corner of the South Half of said Quarter Section for the point of beginning; thence West along the North line of the South Half of said Quarter Section, a distance of 600 feet; thence South, parallel to the East line of said Quarter Section, a distance of 410 feet; thence East, parallel to the North line of the

South Half of said Quarter Section, a distance of 600 feet, more or less, to the East line of said Quarter Section; thence North along the East line of said Quarter Section, a distance of 410 feet, more or less to the Northeast corner of the South Half of said Quarter Section and the point of beginning.

Owner of Record: Chad Bauman

- (2) A tract of land located in the South Half of the Southwest Quarter of Section 27, Township 12 South, Range 18 East of the 6th P.M. in Douglas County, Kansas, more particularly described as follows:

Beginning at the Northeast corner of the South Half of said Quarter Section; thence West along the North line of the South Half of said Quarter Section, a distance of 600 feet for a point of beginning; thence continuing West along the North line of the South Half of said Quarter section, a distance of 720 feet; thence South, parallel to the West line of said Quarter Section, a distance of 500 feet; thence East, parallel to the South line of said Quarter Section, a distance of 455 feet; thence South, parallel to the West line of said Quarter Section, a distance of 820 feet, more or less, to the South lone of said Quarter section, thence East along the South line of said Quarter Section, a distance of 365 feet; thence North, parallel to the East line of said Quarter Section, a distance of 500 feet; thence West, parallel to the South line of said Quarter Section, a distance of 100 feet; thence North, parallel to the East line of said Quarter Section, a distance of 820 feet, more or less, to the North line of the South Half of said Quarter Section and the point of beginning.

Owner of Record: Chad Bauman and Carey Willming

- (3) 1605 E. 550 Road, Lawrence, Kansas - which is a parcel of land in the Southwest Quarter of Section 27, Township 12 South, Range 18 East of the 6th P.M. in Douglas County, Kansas, and more particularly described as follows:

Beginning at the Southeast corner of the Southwest Quarter of said Section 27; thence South 90°00'00" West along the South line of the Southwest Quarter of said Section 27 a distance of 498.40 feet; thence North 00°20'02" West a distance of 501.64 feet; thence South 89°57'35" West a distance of 100.11 feet; thence North 00°20'02" West a distance of 411.21 feet; thence North 89°55'10" East a distance of 598.51 feet to the East line of the Southwest Quarter of said Section 27; thence South 00°20'02" East along the East line of the Southwest Quarter of said Section 27 a distance of 913.62 feet to the point of beginning, in Douglas County, Kansas.

Owner of record: Chad Bauman and Carey Willming

(4) 7341 SW 23rd St., Topeka, Kansas 66614

Part of Lot 1, Block B, WEST INDIAN HILLS SUBDIVISION NO. 11, in the City of Topeka, Shawnee County, Kansas, described as follows: Commencing at the Northwest Corner of said Lot 1; thence North 88 degrees 26 minutes 34 seconds East (meas) North 88 degrees 26 minutes 14 seconds East (plat) along the North line of said Lot 1, 48.21 feet to the Point of Beginning; thence continuing North 88 degrees 26 minutes 34 seconds East (meas) North 88 degrees 26 minutes 14 seconds East (plat) along the North line of said Lot 1, 41.25 feet to the Northeast Corner of said Lot 1; thence South 1 degree 31 minutes 54 seconds East (meas) South 1 degree 33 minutes 46 seconds East (plat) along the East line of said Lot 1, 115.16 feet (meas) 115.00 feet (plat) to the Southeast Corner of said Lot 1; thence South 88 degrees 24 minutes 23 seconds West (meas) South 88 degrees 26 minutes 14 seconds West (plat) along the South line of said Lot 1, 40.86 feet; thence North 1 degree 43 minutes 39 seconds West, 115.18 feet to the Point of Beginning.

Owner of Record: Bauman Properties

(5) 1538 A Legend Trail Drive, Lawrence, Kansas

Parcel 19A (1538A Legend Trail Drive), as shown on a Plat of Survey for Lot 19, Block One, Legend Trail Addition, a subdivision in the City of Lawrence, Douglas County, Kansas, recorded in the office of the Register of Deeds in Douglas County, Kansas., in Book 825 at page 289.

Owner of Record: Chad Bauman

(6) 3324 E. 12th Street, Kansas City, Missouri

Lot 8 (Except that part thereof in 12th Street in Block 3, S.H. Bales First Addition, a subdivision in Kansas City, Jackson County, Missouri.

Owner of Record: Los Dahda

(7) 4741-4753 Parallel Parkway, Kansas City, Kansas 66104 Parcel #916621

Tract I - Beginning 766 feet West of the Northwest corner of the Northeast Quarter of Section 1, Township 11, Range 24, in Wyandotte County, Kansas, thence North 21 poles thence West 130 feet to the point of beginning less that part taken or used for public road.

Tract II - Beginning 766 feet West of the Northeast corner of the Northeast Quarter of Section 1, Township 11, Range 24, in Wyandotte County, Kansas, thence South 21 poles, thence West 130 feet, thence North 21 poles, thence West 130 feet to the point of beginning, less that part taken or used for public road, less the West 35 feet as conveyed by instrument filed in Book 3098, Page 205.

C. PERSONAL PROPERTY

- (1) Contents of Sunflower Bank account xxxxxx4034, in the amount of \$2,853.41, owned by Dosh Industries, LLC.
- (2) Contents of Sunflower Bank account xxxxxx3386, in the amount of \$10,578.39, owned by Chad Bauman.
- (3) Contents of Sunflower Bank account xxxxxx2439, in the amount of \$13,226.55, owned by Extreme Carpet Cleaning and Restoration.
- (4) Contents of Sunflower Bank account xxxxxx7573, in the amount of \$16,070.54, owned by CB Used Cars, LLC.
- (5) Contents of Sunflower Bank account xxxxxx4052, in the amount of \$24,718.47, owned by MAS Construction, LLC.
- (6) Contents of Sunflower Bank account xxxxx8022, in the amount of \$8,592.35, owned by Bauman Properties, LLC.
- (7) Contents of US Bank, NA account xxxxxxxx1133, in the amount of \$15,700.95, owned by Dosh Industries, LLC.
- (8) Contents of Fidelity Investment account xxx-xx2873, in the amount of \$25,012.81, owned by Chad Bauman.
- (9) Contents of Fidelity Investment account xxx-xx6740, in the amount of \$10,005.75, owned by Chad Bauman.
- (10) Contents of United Missouri Bank account xxxxxx5270, in the amount of \$5,373.58, owned by Carey Willming.
- (11) Contents of Peoples' Bank account xxxx5541, in the amount of \$40,301.39, owned by Fusion Inc.

D. FIREARMS

- a. a .45 caliber ACP Taurus pistol, Model 24/7, serial number NYD82719;
- b. a 12 gauge Mossberg shotgun, serial number T4562435;
- c. a .357 caliber Rossi revolver, serial number CP773840;
- d. a .22 caliber LR GSG-5P rifle, serial number A30421;
- e. a 9mm Springfield Armory pistol, Model XP9, serial number US859024;
- f. a .308 caliber Springfield Armory rifle, Model M1A, serial number 114766;
- g. a 12 gauge Browning shotgun, Model Goldfinger, serial number 113MZ14281;
- h. a .22 caliber LR Smith & Wesson rifle, Model M&P 15-22, serial number DUU5907;
- i. a 5.56mm Rock River Arms rifle, Model LAR-15, serial number KT1060-28;

- j. a .22 caliber Smith & Wesson revolver, Model Singe-Six, serial number 264-47754;
- k. a .45 caliber Springfield Armory pistol, Model XD-45ACP, serial number US609848;
- l. a .40 caliber Glock pistol, Model 23, serial number PX763;
- m. a 5.56 caliber Herstal Belgium rifle, Model Bulpup FS2000, serial number 026226;
- n. a 12 gauge Remington shotgun, Model 870 express magnum, serial number A165942M;
- o. 5.7 x 28 caliber FN pistol, serial number 386208138;
- p. a .45 caliber Glock pistol, Model 30, serial number SKA490;
- q. a 5.56mm Kel Tec pistol, Model PLR-16, serial number P1X49;
- r. a 5.7 x 28 caliber FN pistol, Model Five-Seven, serial number 386221208; and,
- s. all ammunition seized in connection with this investigation.

FORFEITURE NOTICE - MONEY LAUNDERING VIOLATIONS

5. The allegations contained in Counts 1 through 101 of the Indictment are re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to the provisions of Title 18, United States Code, Section 982.

6. Upon conviction of the offenses identified in Counts 2, 4-7, 12-14, 17-19, 43, and 76 the defendants,

**CHAD EUGENE BAUMAN,
CAREY LYNN WILLMING,
and
STEPHEN MALLSION RECTOR,**

shall forfeit to the United States pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in such offense, and any property traceable to such property. The property to be forfeited includes, but is not limited to, the following:

A. MONEY JUDGMENT

A sum of money equal to \$1,416,330.00 in United States currency, representing the amount of proceeds obtained as a result of the money laundering offenses, for which the

defendants are jointly and severally liable.

B. REAL PROPERTY

All lots or parcels of land, together with their buildings, appurtenances, improvements, fixtures, attachments and easements, at the addresses listed and described below:

- (1) A tract of land located in the South Half of the Southwest Quarter of Section 27, Township 12 South, Range 18 East of the 6th P.M., in Douglas County, Kansas, more particularly described as follows:

Beginning at the Northeast corner of the South Half of said Quarter Section for the point of beginning; thence West along the North line of the South Half of said Quarter Section, a distance of 600 feet; thence South, parallel to the East line of said Quarter Section, a distance of 410 feet; thence East, parallel to the North line of the South Half of said Quarter Section, a distance of 600 feet, more or less, to the East line of said Quarter Section; thence North along the East line of said Quarter Section, a distance of 410 feet, more or less to the Northeast corner of the South Half of said Quarter Section and the point of beginning.

Owner of Record: Chad Bauman

- (2) A tract of land located in the South Half of the Southwest Quarter of Section 27, Township 12 South, Range 18 East of the 6th P.M. in Douglas County, Kansas, more particularly described as follows:

Beginning at the Northeast corner of the South Half of said Quarter Section; thence West along the North line of the South Half of said Quarter Section, a distance of 600 feet for a point of beginning; thence continuing West along the North line of the South Half of said Quarter section, a distance of 720 feet; thence South, parallel to the West line of said Quarter Section, a distance of 500 feet; thence East, parallel to the South line of said Quarter Section, a distance of 455 feet; thence South, parallel to the West line of said Quarter Section, a distance of 820 feet, more or less, to the South lone of said Quarter section, thence East along the South line of said Quarter Section, a distance of 365 feet; thence North, parallel to the East line of said Quarter Section, a distance of 500 feet; thence West, parallel to the South line of said Quarter Section, a distance of 100 feet; thence North, parallel to the East line of said Quarter Section, a distance of 820 feet, more or less, to the North line of the South Half of said Quarter Section and the point of beginning.

Owner of Record: Chad Bauman and Carey Willming

- (3) 1605 E. 550 Road, Lawrence, Kansas - which is a parcel of land in the Southwest Quarter of Section 27, Township 12 South, Range 18 East of the 6th P.M. in Douglas County, Kansas, and more particularly described as follows:

Beginning at the Southeast corner of the Southwest Quarter of said Section 27; thence South 90°00'00" West along the South line of the Southwest Quarter of said Section 27 a distance of 498.40 feet; thence North 00°20'02" West a distance of 501.64 feet; thence South 89°57'35" West a distance of 100.11 feet; thence North 00°20'02" West a distance of 411.21 feet; thence North 89°55'10" East a distance of 598.51 feet to the East line of the Southwest Quarter of said Section 27; thence South 00°20'02" East along the East line of the Southwest Quarter of said Section 27 a distance of 913.62 feet to the point of beginning, in Douglas County, Kansas.

Owner of record: Chad Bauman and Carey Willming

- (4) 7341 SW 23rd St., Topeka, Kansas 66614

Part of Lot 1, Block B, WEST INDIAN HILLS SUBDIVISION NO. 11, in the City of Topeka, Shawnee County, Kansas, described as follows: Commencing at the Northwest Corner of said Lot 1; thence North 88 degrees 26 minutes 34 seconds East (meas) North 88 degrees 26 minutes 14 seconds East (plat) along the North line of said Lot 1, 48.21 feet to the Point of Beginning; thence continuing North 88 degrees 26 minutes 34 seconds East (meas) North 88 degrees 26 minutes 14 seconds East (plat) along the North line of said Lot 1, 41.25 feet to the Northeast Corner of said Lot 1; thence South 1 degree 31 minutes 54 seconds East (meas) South 1 degree 33 minutes 46 seconds East (plat) along the East line of said Lot 1, 115.16 feet (meas) 115.00 feet (plat) to the Southeast Corner of said Lot 1; thence South 88 degrees 24 minutes 23 seconds West (meas) South 88 degrees 26 minutes 14 seconds West (plat) along the South line of said Lot 1, 40.86 feet; thence North 1 degree 43 minutes 39 seconds West, 115.18 feet to the Point of Beginning.

Owner of Record: Bauman Properties

C. PERSONAL PROPERTY

- (1) Contents of Sunflower Bank account xxxxxx4034, in the amount of \$2,853.41, owned by Dosh Industries, LLC.
- (2) Contents of Sunflower Bank account xxxxxx3386, in the amount of \$10,578.39, owned by Chad Bauman.

- (3) Contents of Sunflower Bank account xxxxxx2439, in the amount of \$13,226.55, owned by Extreme Carpet Cleaning and Restoration.
- (4) Contents of Sunflower Bank account xxxxxx7573, in the amount of \$16,070.54, owned by CB Used Cars, LLC.
- (5) Contents of Sunflower Bank account xxxxxx4052, in the amount of \$24,718.47, owned by MAS Construction, LLC.
- (6) Contents of Sunflower Bank account xxxxx8022, in the amount of \$8,592.35, owned by Bauman Properties, LLC.
- (7) Contents of US Bank, NA account xxxxxxxx1133, in the amount of \$15,700.95, owned by Dosh Industries, LLC.
- (8) Contents of Fidelity Investment account xxx-xx2873, in the amount of \$25,012.81, owned by Chad Bauman.
- (9) Contents of Fidelity Investment account xxx-xx6740, in the amount of \$10,005.75, owned by Chad Bauman.
- (10) Contents of United Missouri Bank account xxxxxx5270, in the amount of \$5,373.58, owned by Carey Willming.
- (11) Contents of Peoples' Bank account xxxx5541, in the amount of \$40,301.39, owned by Fusion Inc.

All pursuant to Title 18, United States Code, Section 982.

E. If any of the property described above, as a result of any act or omission of the defendant:

- 1) cannot be located upon the exercise of due diligence;
- 2) has been transferred or sold to, or deposited with, a third party;
- 3) has been placed beyond the jurisdiction of the court;
- 4) has been substantially diminished in value; or
- 5) 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).

A TRUE BILL.

DATED: July 11, 2012

s/ Foreperson
FOREPERSON OF THE GRAND JURY

s/ Terra D. Morehead #12759
BARRY R. GRISSOM, Ks. S. Ct. No. 10866
United States Attorney
District of Kansas
500 State Ave., Suite 360
Kansas City, KS 66101
(913) 551-6730
(913) 551-6541 (fax)
barry.grissom@usdoj.gov

(It is requested that trial of the above captioned case be held in Kansas City, Kansas.)

PENALTIES:

Count 1:

- NLT 10 Years NMT Life Imprisonment,
- NMT \$10,000,000.00 Fine,
- NLT 5 Years S.R.,
- Special Assessment \$100.00, and,
- Forfeiture Allegation.

In the event of a prior conviction for a felony drug offense:

- NLT 20 years, NMT Life Imprisonment,
- NMT \$20,000,000.00 Fine,
- NLT 10 years S.R.,
- \$100 Special Assessment, and,
- Forfeiture Allegation.

In the event of two or more prior convictions for a felony drug offense:

- NLT Life Imprisonment,
- NMT \$20,000,000.00 Fine,
- \$100 Special Assessment, and,
- Forfeiture Allegation.

Counts 2, 7, 12-14, 17-19, 43:

- NMT 20 years Imprisonment,
- NMT \$250,000.00 Fine,
- NMT 3 years S.R.,
- \$100 Special Assessment, and,
- Forfeiture Allegation.

Count 3:

- NLT 20 years imprisonment, NMT life imprisonment;
- NMT \$2,000,000.00 fine;
- NMT 5 years supervised release;
- \$100.00 special assessment fee;
- Forfeiture Allegations.

If the defendant has a prior conviction for CCE then the penalties are:

- NLT 30 years imprisonment, NMT life imprisonment;
- NMT \$4,000,000.00 fine;
- NMT 5 years supervised release;
- \$100.00 special assessment fee;
- Forfeiture Allegations.

Counts 4-6, 21, 76, 96, 98:

- NMT 10 years Imprisonment,
- NMT \$250,000.00 Fine,
- NMT 3 years S.R.,
- \$100 Special Assessment, and,
- Forfeiture Allegation.

Counts 8, 11, 20, 24, 32, 50, 101:

- NLT 5 years and NMT 40 years Imprisonment,
- NMT \$5,000,000.00 Fine,
- NLT 4 years S.R.,
- \$100 Special Assessment, and,
- Forfeiture Allegation.

In the event of a prior conviction for a felony drug offense:

- NLT 10 years, NMT Life Imprisonment,
- NMT \$8,000,000.00 Fine,
- NLT 8 years SR, and
- \$100 Special Assessment, and,
- Forfeiture Allegation.

Counts 9, 16:

- NMT 10 years Imprisonment,
- NMT \$500,000.00 Fine,
- NLT 4 years S.R.,
- \$100 Special Assessment, and
- Forfeiture Allegation.

In the event of a prior conviction for a felony drug offense:

- NMT 20 years Imprisonment,
- NMT \$1,000,000.00 Fine,
- NLT 8 years S.R.,
- \$100 Special Assessment, and,
- Forfeiture Allegation.

Counts 28, 30, 57, 62, 68, 92, 96:

- NLT 1 year, NMT 20 years Imprisonment,
- NMT \$500,000.00 Fine,
- NMT 5 years S.R.,
- \$100 Special Assessment, and
- Forfeiture Allegation.

Counts 10, 15, 22-23, 25-26, 34-35, 39, 42, 48-49, 56, 59-61, 67, 71-72, 74, 77, 79-80, 82-85, 87-91, 93, 97:

- NMT 5 years Imprisonment,
- NMT \$250,000.00 Fine,
- NLT 2 years S.R.,
- \$100 Special Assessment, and
- Forfeiture Allegation.

In the event of a prior conviction for a felony drug offense:

- NMT 10 years Imprisonment,
- NMT \$500,000.00 Fine,
- NLT 4 years S.R.,
- \$100 Special Assessment, and
- Forfeiture Allegation.

Count 27:

- NMT 20 years Imprisonment,
- NMT \$1,000,000.00 Fine,
- NLT 3 years S.R.,
- \$100 Special Assessment, and
- Forfeiture Allegation.

In the event of a prior conviction for a felony drug offense:

- NMT 30 years Imprisonment,
- NMT \$2,000,000.00 Fine,
- NLT 6 years S.R.,
- \$100 Special Assessment, and
- Forfeiture Allegation.

Counts 95, 100:

- NLT Mandatory Minimum 5 Years and NMT Life Imprisonment (consecutive),
- NMT \$250,000.00 Fine,
- NMT 5 Years S.R.,
- \$100 Special Assessment, and,
- Forfeiture Allegation.

Upon any second or subsequent conviction:

- NLT Mandatory Minimum 25 Years and NMT Life Imprisonment (consecutive to all other terms of imprisonment),
- NMT \$250,000.00 Fine,
- NMT 5 Years S.R.,
- \$100.00 Special Assessment, and,
- Forfeiture Allegation.

Counts 28:

- NLT 1 year, NMT 40 years Imprisonment,
- NMT \$1,000,000.00 Fine,
- NMT 10 years S.R.,
- \$100 Special Assessment, and
- Forfeiture Allegation.

Counts 31, 33, 46, 55, 58, 99:

- NMT 10 years Imprisonment,
- NMT \$500,000.00 Fine,
- NLT 4 years S.R.,
- \$100 Special Assessment, and
- Forfeiture Allegation.

In the event of a prior conviction for a felony drug offense:

- NMT 20 years Imprisonment,
- NMT \$1,000,000.00 Fine,
- NLT 8 years S.R.,
- \$100 Special Assessment, and,
- Forfeiture Allegation.

Counts 36-38, 40-41, 44-45, 47, 51-54, 63-66, 69-70, 73, 75, 78, 81, 86:

- NMT 4 years Imprisonment;
- NMT \$ 250,000.00 Fine;
- NMT 3 years S.R.,
- \$100 Special Assessment.