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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2026 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAVINDER SINGH DHANDA,
aka "Randy,"
aka "Rolex,"
aka "Jim,"
aka "Daytona,"
aka "John Wick,"
JASKARN BAGHRI,
aka "Baba,"
aka "Pete,"
GURTEJ SINGH SMAGH,
aka "Simba,"
HARMANVEER SINGH,
aka "Hari Gautam,"
aka "Harman Sandhu,"
PRINCE PAL SINGH,
NARAIN SINGH GURM,
aka "Naraw Singh Gurm,"
aka "Narayan Singh,"
JAVIER URETA ANGULO,
JUSTIN GUZMAN,
BRYAN MORENO ROSALES,
JASPREET KHARA, and
AMRITPAL SINGH,

Defendants.

CR 2:26-cr-00408-WLH

I N D I C T M E N T

[21 U.S.C. § 846: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances; 21 U.S.C. § 963: Conspiracy to Export Controlled Substances; 21 U.S.C. § 848(a), (b), (s): Continuing Criminal Enterprise; 21 U.S.C. § 841(a)(1), (b)(1)(A): Possession with Intent to Distribute Controlled Substances; 21 U.S.C. §§ 848, 853, and 970, 18 U.S.C. § 924, & 28 U.S.C. § 2461(c): Criminal Forfeiture]

The Grand Jury charges:

1 1. Defendant DHANDA would operate a cocaine and
2 methamphetamine distribution network (the "Dhanda Drug Trafficking
3 Organization" or "DHANDA DTO") that provided international smuggling
4 services for bulk quantities of cocaine and methamphetamine to drug
5 trafficking organizations located in the United States, Mexico, and
6 elsewhere.

7 2. Defendant DHANDA would negotiate transportation rates and
8 logistics with representatives from drug trafficking organizations
9 located in the United States, Mexico, and elsewhere for transporting
10 cocaine and methamphetamine from the United States to Canada.

11 3. Defendant DHANDA would, in certain instances, subcontract
12 the storage of cocaine and methamphetamine in the United States, as
13 well as the transportation of these controlled substances from
14 locations in the United States, including the Central District of
15 California, to in and around the U.S.-Canada border.

16 4. Defendants DHANDA and BAGHRI would oversee and manage the
17 storage, transportation, and international smuggling of cocaine and
18 methamphetamine across the U.S.-Canada border.

19 5. Defendant SMAGH would gather information related to the
20 timing and location of border inspections and other enforcement
21 actions from an individual working for the Canadian Border Services
22 Agency ("CBSA") to assist with smuggling cocaine and methamphetamine
23 across the U.S.-Canada border.

24 6. Defendants DHANDA and BAGHRI would coordinate the exchange
25 of token information, typically the serial number of a dollar bill,
26 to be used in the handing off of cocaine or methamphetamine by a
27 courier for the drug trafficking organizations contracting with the
28 DHANDA DTO for transportation and smuggling services.

1 7. Defendants DHANDA and BAGHRI would coordinate the exchange
2 of contact information, including telephone numbers, for couriers
3 handing off cocaine or methamphetamine from the drug trafficking
4 organizations contracting with the DHANDA DTO for transportation and
5 smuggling services.

6 8. Defendants ANGULO, GUZMAN, and MORENO, and others unknown
7 to the Grand Jury, would deliver cocaine on behalf of drug
8 trafficking organizations using the DHANDA DTO for transportation and
9 smuggling services to transporters in and around the Central District
10 of California.

11 9. Defendants ANGULO, GUZMAN, and MORENO, and others unknown
12 to the Grand Jury, would use the token information and contact
13 information circulated by defendants DHANDA or BAGHRI to coordinate
14 the handoff of cocaine and verify the identity of the receiving
15 party.

16 10. Defendant P. SINGH, and others unknown to the Grand Jury,
17 would receive cocaine and methamphetamine from couriers for drug
18 trafficking organizations using the DHANDA DTO for transportation and
19 smuggling services in and around the Central District of California.

20 11. Defendant P. SINGH, and others unknown to the Grand Jury,
21 would use the token information and contact information circulated by
22 DHANDA or BAGHRI to coordinate the receipt of cocaine and
23 methamphetamine and to verify the identity of the delivering party.

24 12. Defendants P. SINGH and GURM, and others unknown to the
25 Grand Jury, would store cocaine and methamphetamine in and around the
26 Central District of California until a long-haul semi-truck used to
27 smuggle cocaine and methamphetamine to the U.S.-Canada border was
28 ready for loading.

1 13. Defendants DHANDA and H. SINGH, and others known and
2 unknown to the Grand Jury, would oversee and manage the long-haul
3 semi-trucks used to transport cocaine and methamphetamine to the
4 U.S.-Canada border.

5 14. Defendants P. SINGH and GURM, and others unknown to the
6 Grand Jury, would deliver cocaine and methamphetamine to long-haul
7 semi-trucks for transportation to the U.S.-Canada border.

8 15. Defendants KHARA and A. SINGH, and others unknown to the
9 Grand Jury, would conceal cocaine and methamphetamine on board long-
10 haul semi-trucks carrying legitimate goods for purposes of
11 transportation to the U.S.-Canada border.

12 16. Defendants KHARA and A. SINGH, and others unknown to the
13 Grand Jury, would transport cocaine and methamphetamine hidden aboard
14 long-haul semi-trucks from the greater Los Angeles area to the U.S.-
15 Canada border.

16 17. Defendant SMAGH, and others unknown to the Grand Jury,
17 would assist with smuggling cocaine and methamphetamine across the
18 U.S.-Canada border, including by, among other methods, hiding cocaine
19 and methamphetamine aboard farm trucks used on working farms at the
20 U.S.-Canada border.

21 18. Defendants DHANDA and BAGHRI, and others unknown to the
22 Grand Jury, would coordinate the distribution, in Canada, of cocaine
23 and methamphetamine to recipients identified by the drug trafficking
24 organizations contracting with the DHANDA DTO for transportation and
25 smuggling services.

26 19. Through this conspiracy, defendants would transport,
27 smuggle, and distribute hundreds of kilograms of cocaine and
28 methamphetamine each week.

1 C. OVERT ACTS

2 In furtherance of the conspiracy and to accomplish its objects,
3 on or about the following dates, defendants DHANDA, BAGHRI, SMAGH, H.
4 SINGH, P. SINGH, GURM, ANGULO, GUZMAN, ROSALES, KHARA, and A. SINGH,
5 and others known and unknown to the Grand Jury, committed various
6 overt acts within the Central District of California and elsewhere,
7 including, but not limited to, the following:

8 **70 Kilogram Cocaine Load on July 11, 2023**

9 Overt Act No. 1: On July 10, 2023, defendant DHANDA directed
10 a person who defendant DHANDA and other co-conspirators believed was
11 a drug transportation coordinator, but who was, in fact, a
12 confidential informant working with law enforcement ("CI-1"), to
13 provide DHANDA with the telephone number of a drug transporter and a
14 serial number on a bill of currency so that defendant DHANDA could
15 pass the information to a person who would deliver or coordinate the
16 delivery of cocaine to a drug transporter in the Los Angeles area.

17 Overt Act No. 2: On July 10, 2023, defendant DHANDA passed
18 the telephone number and serial number previously provided by CI-1 to
19 a representative for a drug trafficking organization contracting with
20 the DHANDA DTO for drug transportation and smuggling services to
21 facilitate the delivery of cocaine to a drug transporter in the Los
22 Angeles area.

23 Overt Act No. 3: On July 11, 2023, defendant P. SINGH
24 received approximately 70 kilograms of a mixture and substance
25 containing a detectable amount of cocaine in three cardboard boxes in
26 a parking lot in Los Angeles, California from a courier for a drug
27 trafficking organization contracting with the DHANDA DTO for drug
28 transportation and smuggling services.

1 Overt Act No. 4: On July 11, 2023, defendant DHANDA directed
2 CI-1 to confirm the receipt of cocaine, and to coordinate a count of
3 the cocaine prior to transportation.

4 **Coordination Meeting at Peace Arch Historical Park**

5 Overt Act No. 5: On July 18, 2023, defendants DHANDA and
6 BAGHRI met with CI-1 at Peace Arch Historical Park in Blaine,
7 Washington to coordinate logistics for transporting future loads of
8 cocaine and methamphetamine to the U.S.-Canada border, and for
9 smuggling those drug loads across the U.S.-Canada border.

10 **40 Kilogram Cocaine Load on July 28, 2023**

11 Overt Act No. 6: On July 27, 2023, defendant BAGHRI directed
12 CI-1 to provide BAGHRI with the telephone number of a drug
13 transporter and a serial number on a bill of currency so that
14 defendant BAGHRI could pass the information to the person who would
15 deliver or coordinate the delivery of cocaine to a drug transporter
16 in the Los Angeles area.

17 Overt Act No. 7: On July 27, 2023, defendant BAGHRI passed
18 the telephone number and serial number previously provided by CI-1 to
19 a representative for a drug trafficking organization contracting with
20 the DHANDA DTO for drug transportation and smuggling services to
21 facilitate the delivery of cocaine to a drug transporter in the Los
22 Angeles area.

23 Overt Act No. 8: On July 28, 2023, defendant P. SINGH
24 received approximately 40 kilograms of a mixture and substance
25 containing a detectable amount of cocaine in four pieces of luggage
26 at a parking lot in West Covina, California from a courier for a drug
27 trafficking organization contracting with the DHANDA DTO for drug
28 transportation and smuggling services.

1 deliver or coordinate the delivery of cocaine to a drug transporter
2 in the Los Angeles area.

3 Overt Act No. 14: On August 24, 2023, defendant BAGHRI passed
4 the telephone number and serial number previously provided by CI-1 to
5 a representative for a drug trafficking organization contracting with
6 the DHANDA DTO for drug transportation and smuggling services to
7 facilitate the delivery of cocaine to a drug transporter in the Los
8 Angeles area.

9 Overt Act No. 15: On August 25, 2023, defendant P. SINGH
10 received approximately 50 kilograms of a mixture and substance
11 containing a detectable amount of cocaine in a parking lot in
12 Ontario, California from a courier for a drug trafficking
13 organization contracting with the DHANDA DTO for drug transportation
14 and smuggling services.

15 **79.4 Kilogram Cocaine Load on September 18, 2023**

16 Overt Act No. 16: On September 14, 2023, defendant DHANDA
17 directed CI-1 to provide DHANDA with the telephone number of a drug
18 transporter and a serial number on a bill of currency so that
19 defendant DHANDA could pass the information to the person who would
20 deliver or coordinate the delivery of cocaine to a drug transporter
21 in the Los Angeles area.

22 Overt Act No. 17: On September 14, 2023, defendant DHANDA
23 passed the telephone number and serial number previously provided by
24 CI-1 to a representative for a drug trafficking organization
25 contracting with the DHANDA DTO for drug transportation and smuggling
26 services to facilitate the delivery of cocaine to a drug transporter
27 in the Los Angeles area.

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1 Overt Act No. 18: On September 16, 2023, defendant ANGULO
2 delivered approximately 79.4 kilograms of a mixture and substance
3 containing a detectable amount of cocaine in four duffel bags on
4 behalf of a drug trafficking organization contracting with the DHANDA
5 DTO for drug transportation and smuggling services to defendant P.
6 SINGH at a parking lot in Ontario, California.

7 Overt Act No. 19: On September 18, 2023, defendant P. SINGH
8 delivered the approximately 79.4 kilograms of a mixture and substance
9 containing a detectable amount of cocaine previously received from
10 defendant ANGULO to defendants KHARA and A. SINGH in Rialto,
11 California for purposes of transportation to the U.S.-Canada border.

12 Overt Act No. 20: On September 18, 2023, defendant P. SINGH
13 loaded the approximately 79.4 kilograms of cocaine onto a long-haul
14 semi-truck while defendants KHARA and A. SINGH acted as lookouts.

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1 Overt Act No. 21: On September 18, 2023, defendants KHARA and
2 A. SINGH transported, in four duffel bags in the rear of a long-haul
3 semi-truck's trailer, approximately 79.4 kilograms of a mixture and
4 substance containing a detectable amount of cocaine, as depicted
5 below:



21 **24 Kilogram Cocaine Load on August 25, 2023**

22 Overt Act No. 22: On October 16, 2023, defendant DHANDA
23 directed CI-1 to provide DHANDA with the telephone number of a drug
24 transporter and a serial number on a bill of currency so that
25 defendant DHANDA could pass the information to the person who would
26 deliver or coordinate the delivery of cocaine to a drug transporter
27 in the Los Angeles area.

1 Overt Act No. 23: On October 16, 2023, defendant DHANDA passed
2 the telephone number and serial number previously provided by CI-1 to
3 a representative for a drug trafficking organization contracting with
4 the DHANDA DTO for drug transportation and smuggling services to
5 facilitate the delivery of cocaine to a drug transporter in the Los
6 Angeles area.

7 Overt Act No. 24: On October 17, 2023, defendant P. SINGH
8 received approximately 24 kilograms of a mixture and substance
9 containing a detectable amount of cocaine in two cardboard boxes at a
10 parking lot in Perris, California from a courier for a drug
11 trafficking organization contracting with the DHANDA DTO for drug
12 transportation and smuggling services.

13 **44.7 Kilogram Cocaine Load on October 26, 2023**

14 Overt Act No. 25: On October 23, 2023, defendant DHANDA
15 directed CI-1 to provide DHANDA with the telephone number of a drug
16 transporter and a serial number on a bill of currency so that
17 defendant DHANDA could pass the information to the person who would
18 deliver or coordinate the delivery of cocaine to a drug transporter
19 in the Los Angeles area.

20 Overt Act No. 26: Between October 23 and October 26, 2023,
21 defendant DHANDA passed the telephone number and serial number
22 previously provided by CI-1 to a representative for a drug
23 trafficking organization contracting with the DHANDA DTO for drug
24 transportation and smuggling services to facilitate the delivery of
25 cocaine to a drug transporter in the Los Angeles area.

26 Overt Act No. 27: On October 26, 2023, defendant ROSALES
27 attempted to deliver approximately 44.7 kilograms of a mixture and
28 substance containing a detectable amount of cocaine in two duffel

1 bags and a box on behalf of a drug trafficking organization
2 contracting with the DHANDA DTO for drug transportation and smuggling
3 services, as depicted below:



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49 Kilogram Cocaine Load on November 15, 2024

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16 Overt Act No. 28: On November 14, 2024, defendant H. SINGH,
17 Co-Conspirator 1, and CI-1 met in Greenwood, Indiana to coordinate
18 logistics for transporting cocaine and methamphetamine to the U.S.-
19 Canada border, and Co-Conspirator 1 provided CI-1 the telephone
20 number of a drug transporter who could collect the drugs.

21 Overt Act No. 29: On November 14, 2024, defendant DHANDA
22 provided CI-1 the telephone number of the person who would deliver or
23 coordinate the delivery of cocaine to a drug transporter in the Los
24 Angeles area.

25 Overt Act No. 30: On November 15, 2024, Co-Conspirator 2
26 received approximately 49 kilograms of a mixture and substance
27 containing a detectable amount of cocaine from a courier for a drug
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1 trafficking organization contracting with the DHANDA DTO for drug
2 transportation and smuggling services.

3 Overt Act No. 31: On November 15, 2024, defendant GURM
4 received approximately 49 kilograms of a mixture and substance
5 containing a detectable amount of cocaine in multiple boxes from Co-
6 Conspirator 2 at a parking lot in Fontana, California, as depicted
7 below:



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18 Overt Act No. 32: On November 15, 2024, defendant H. SINGH
19 agreed to obtain information related to the November 15, 2024 traffic
20 stop of GURM and subsequent seizure of the cocaine load for purposes
21 of proving to the drug trafficking organization contracting with the
22 DHANDA DTO for drug transportation and smuggling services that the
23 cocaine load had been seized by law enforcement.

24 **Coordination Meeting in South Surrey**

25 Overt Act No. 33: On January 20, 2025, defendants DHANDA,
26 BAGHRI, and SMAGH met with CI-1 in South Surrey, British Columbia to
27 coordinate logistics for smuggling future loads of cocaine and
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1 methamphetamine out of the United States and into Canada, at which
2 meeting defendant DHANDA stated he intended to start a new "cartel".

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1 C. OVERT ACTS

2 In furtherance of the conspiracy and to accomplish its objects,
3 on or about the following dates, defendants DHANDA, BAGHRI, SMAGH,
4 and H. SINGH, and others known and unknown to the Grand Jury,
5 committed various overt acts within the Central District of
6 California and elsewhere, including, but not limited to, Overt Acts 1
7 through 33, as set forth in Count One of this Indictment, which are
8 realleged and incorporated here.

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COUNT FOUR

[21 U.S.C. § 841(a)(1), (b)(1)(A)(ii); 18 U.S.C. § 2]

[DEFENDANTS DHANDA, P. SINGH, KHARA, and A. SINGH]

On or about September 18, 2023, in San Bernadino County, within the Central District of California, defendants RAVINDER SINGH DHANDA, also known as "Randy," "Rolex," "Jim," "Daytona," and "John Wick," PRINCE PAL SINGH, JASPREET KHARA, and AMRITPAL SINGH, each aiding and abetting the others, knowingly and intentionally possessed with intent to distribute at least five kilograms, that is, approximately 79.4 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance.

COUNT FIVE

[21 U.S.C. § 841(a)(1), (b)(1)(A)(ii)]

[DEFENDANT ANGULO]

On or about September 20, 2023, in Los Angeles County, within the Central District of California, defendant JAVIER URETA ANGULO knowingly and intentionally possessed with intent to distribute at least five kilograms, that is, approximately 7.97 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance.

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COUNT SIX

[21 U.S.C. § 841(a)(1), (b)(1)(A)(ii)]

[DEFENDANT ROSALES]

On or about October 26, 2023, in Los Angeles County, within the Central District of California, defendant BRYAN MORENO ROSALES knowingly and intentionally possessed with intent to distribute at least five kilograms, that is, approximately 44.7 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance.

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COUNT SEVEN

[21 U.S.C. § 841(a)(1), (b)(1)(A)(ii)]

[DEFENDANT GUZMAN]

On or about November 13, 2023, in Los Angeles County, within the Central District of California, defendant JUSTIN GUZMAN knowingly and intentionally possessed with intent to distribute at least five kilograms, that is, approximately 8.67 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance.

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COUNT EIGHT

[21 U.S.C. § 841(a)(1), (b)(1)(A)(ii); 18 U.S.C. § 2(a)]

[DEFENDANTS DHANDA, H. SINGH, and GURM]

On or about November 15, 2024, in San Bernadino County, within the Central District of California, defendants RAVINDER SINGH DHANDA, also known as ("aka") "Randy," "Rolex," "Jim," "Daytona," and "John Wick," HARMANVEER SINGH, and NARAIN SINGH GURM, aka "Naraw Singh Gurm" and "Narayan Singh," each aiding and abetting the others, knowingly and intentionally possessed with intent to distribute at least five kilograms, that is, approximately 49 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance.

1 FORFEITURE ALLEGATION ONE

2 [21 U.S.C. § 853; 18 U.S.C. § 924; 28 U.S.C. § 2461(c)]

3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States of America
5 will seek forfeiture as part of any sentence, pursuant to Title 21,
6 United States Code, Section 853, Title 18, United States Code,
7 Section 924(d)(1), and Title 28, United States Code, Section 2461(c),
8 in the event of any defendant's conviction of the offenses set forth
9 in Counts One or Four through Eight of this Indictment.

10 2. Any defendant so convicted shall forfeit to the United
11 States of America the following:

12 (a) All right, title and interest in any and all property,
13 real or personal, constituting or derived from, any proceeds which
14 the defendant obtained, directly or indirectly, from any such
15 offense;

16 (b) All right, title and interest in any and all property,
17 real or personal, used, or intended to be used, in any manner or
18 part, to commit, or to facilitate the commission of any such offense;

19 (c) All right, title, and interest in any firearm or
20 ammunition involved in or used in any such offense; and

21 (d) To the extent such property is not available for
22 forfeiture, a sum of money equal to the total value of the property
23 described in subparagraphs (a), (b), and (c).

24 3. Pursuant to Title 21, United States Code, Section 853(p),
25 any defendant so convicted shall forfeit substitute property if, by
26 any act or omission of said defendant, the property described in the
27 preceding paragraph, or any portion thereof: (a) cannot be located
28 upon the exercise of due diligence; (b) has been transferred, sold

1 to, or deposited with a third party; (c) has been placed beyond the
2 jurisdiction of the court; (d) has been substantially diminished in
3 value; or (e) has been commingled with other property that cannot be
4 divided without difficulty.

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1 FORFEITURE ALLEGATION TWO

2 [21 U.S.C. §§ 853, 970; 18 U.S.C. § 924; 28 U.S.C. § 2461(c)]

3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States of America
5 will seek forfeiture as part of any sentence, pursuant to Title 21,
6 United States Code, Sections 853 and 970, Title 18, United States
7 Code, Section 924(d)(1), and Title 28, United States Code, Section
8 2461(c), in the event of any defendant's conviction of the offense
9 set forth in Count Two of this Indictment.

10 2. Any defendant so convicted shall forfeit to the United
11 States of America the following:

12 (a) All right, title and interest in any and all property,
13 real or personal, constituting or derived from, any proceeds which
14 the defendant obtained, directly or indirectly, from any such
15 offense;

16 (b) All right, title and interest in any and all property,
17 real or personal, used, or intended to be used, in any manner or
18 part, to commit, or to facilitate the commission of any such offense;

19 (c) All right, title, and interest in any firearm or
20 ammunition involved in or used in any such offense; and

21 (d) To the extent such property is not available for
22 forfeiture, a sum of money equal to the total value of the property
23 described in subparagraphs (a), (b), and (c).

24 3. Pursuant to Title 21, United States Code, Section 853(p),
25 any defendant so convicted shall forfeit substitute property if, by
26 any act or omission of said defendant, the property described in the
27 preceding paragraph, or any portion thereof: (a) cannot be located
28 upon the exercise of due diligence; (b) has been transferred, sold

1 to, or deposited with a third party; (c) has been placed beyond the
2 jurisdiction of the court; (d) has been substantially diminished in
3 value; or (e) has been commingled with other property that cannot be
4 divided without difficulty.

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1 FORFEITURE ALLEGATION THREE

2 [21 U.S.C. §§ 853, 848; 18 U.S.C. § 924; 28 U.S.C. § 2461(c)]

3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States of America
5 will seek forfeiture as part of any sentence, pursuant to Title 21,
6 United States Code, Sections 853 and 848(a), Title 18, United States
7 Code, Section 924(d)(1), and Title 28, United States Code, Section
8 2461(c), in the event of any defendant's conviction of the offense
9 set forth in Count Three of this Indictment.

10 2. Any defendant so convicted shall forfeit to the United
11 States of America the following:

12 (a) All right, title and interest in any and all property,
13 real or personal, constituting or derived from, any proceeds which
14 the defendant obtained, directly or indirectly, from any such
15 offense;

16 (b) All right, title and interest in any and all property,
17 real or personal, used, or intended to be used, in any manner or
18 part, to commit, or to facilitate the commission of any such offense;

19 (c) All right, title, and interest in any firearm or
20 ammunition involved in or used in any such offense; and

21 (d) To the extent such property is not available for
22 forfeiture, a sum of money equal to the total value of the property
23 described in subparagraphs (a), (b), and (c).

24 3. Pursuant to Title 21, United States Code, Section 853(p),
25 any defendant so convicted shall forfeit substitute property if, by
26 any act or omission of said defendant, the property described in the
27 preceding paragraph, or any portion thereof: (a) cannot be located
28 upon the exercise of due diligence; (b) has been transferred, sold

1 to, or deposited with a third party; (c) has been placed beyond the
2 jurisdiction of the court; (d) has been substantially diminished in
3 value; or (e) has been commingled with other property that cannot be
4 divided without difficulty.

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7 A TRUE BILL

8
9 /S/
10 Foreperson

11 TODD BLANCHE
12 Acting Attorney General

13 BILAL A. ESSAYLI
14 First Assistant United States Attorney

15 

16 JENNIFER L. WAIER
17 Chief Assistant United States Attorney &
18 Chief, Criminal Division

19 J. MARK CHILDS
20 Assistant United States Attorney
21 Chief, Transnational Organized Crime
22 Section

23 DECLAN T. CONROY
24 Assistant United States Attorney
25 Deputy Chief, Transnational Organized
26 Crime Section
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