

JUN 08 2011

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS

JAMES W. MCCORMACK, CLERK  
By: [Signature]  
DEP. CLERK

UNITED STATES OF AMERICA )  
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)  
v. )  
)  
)  
CHRISTIAN MALDONADO aka PRIMO, )  
GLADIS MALDONADO )  
    aka GLADIS GAMEROS, )  
DANIEL HENRY, JR. aka DANO. )  
REBECCA HENRY, )  
MICHAEL MYERS, )  
PATRICK LINN, )  
JASON HOLMES, )  
BRENT AMADEN, )  
MICHAEL HIMSTEDT, )  
MICHAEL LESZCZYNA aka MIKE D, )  
JOHN HENRY YOUNGBLOOD, JR. )  
OATHER LEE FULMER aka LEBO, )  
REX INGLE, )  
PAUL CRISWELL, )  
PAUL SIMPKINS, )  
MATTHEW GRIFFEY, )  
ALESHIA JOHNSTON, )  
JENNIFER MIZE, )  
MARGARET DIANN HENRY, and )  
DUSTIN DYER. )

No. 4:11CR 00129 JMM

21 U.S.C. § 841(a)(1), (b)(1)(A), 846  
21 U.S.C. § 843  
18 U.S.C. § 4  
18 U.S.C. § 924(c)

**INDICTMENT**

THE GRAND JURY CHARGES THAT:

**COUNT 1**

Beginning in or about 2006, and continuing through on or about June 7, 2011, in the Eastern District of Arkansas and elsewhere,

CHRISTIAN MALDONADO aka PRIMO.  
GLADIS MALDONADO aka GLADIS GAMEROS.  
DANIEL HENRY, JR. aka DANO,  
REBECCA HENRY,  
MICHAEL MYERS,  
PATRICK LINN,  
JASON HOLMES,  
BRENT AMADEN,  
MICHAEL HIMSTEDT,  
MICHAEL LESZCZYNA aka MIKE D,  
JOHN HENRY YOUNGBLOOD, JR.,  
OATHER LEE FULMER aka LEBO,  
REX INGLE,  
PAUL CRISWELL,  
PAUL SIMPKINS,  
MATTHEW GRIFFEY, and  
ALESHIA JOHNSTON,

knowingly and intentionally conspired with each other and other persons known and unknown to the grand jury to knowingly and intentionally possess with intent to distribute and to distribute a controlled substance, methamphetamine, and during the course of the conspiracy 500 grams or more of a mixture or substance containing methamphetamine, a Schedule II controlled substance, was involved, thereby violating Title 21, United States Code, sections 841(a)(1), (b)(1)(A) and 846.

COUNT 2

On or about May 29, 2010, in the Eastern District of Arkansas,

ALESHIA JOHNSTON

knowingly and intentionally possessed with intent to distribute less than 50 grams of a mixture or substance containing methamphetamine, a Schedule II controlled substance, thereby violating Title 21, United States Code, sections 841(a)(1) and (b)(1)(C).

COUNT 3

On or about December 21, 2010, in the Eastern District of Arkansas,

ALESHIA JOHNSTON

knowingly and intentionally possessed with intent to distribute and distributed less than 50 grams of a mixture or substance containing methamphetamine, a Schedule II controlled substance, thereby violating Title 21, United States Code, sections 841(a)(1) and (b)(1)(C).

COUNT 4

On or about December 30, 2010, in the Eastern District of Arkansas,

PATRICK LINN

knowingly and intentionally possessed with intent to distribute and distributed less than 50 grams of a mixture or substance containing methamphetamine, a Schedule II controlled substance, thereby violating Title 21, United States Code, sections 841(a)(1) and (b)(1)(C).

COUNT 5

On or about January 5, 2011, in the Eastern District of Arkansas,

DANIEL HENRY, JR.

knowingly and intentionally possessed with intent to distribute and distributed at least 5 grams, but less than 50 grams of methamphetamine (actual), a Schedule II controlled substance, thereby violating Title 21, United States Code, sections 841(a)(1) and (b)(1)(B).

COUNT 6

On or about January 14, 2011, in the Eastern District of Arkansas,

DANIEL HENRY, JR.

knowingly and intentionally possessed with intent to distribute and distributed at least 5 grams, but less than 50 grams of methamphetamine (actual), a Schedule II controlled substance, thereby violating Title 21, United States Code, sections 841(a)(1) and (b)(1)(B).

COUNT 7

On or about January 26, 2011, in the Eastern District of Arkansas,

DANIEL HENRY, JR.

knowingly and intentionally possessed with intent to distribute and distributed at least 5 grams, but less than 50 grams of methamphetamine (actual), a Schedule II controlled substance, thereby violating Title 21, United States Code, sections 841(a)(1) and (b)(1)(B).

COUNT 8

On or about February 1, 2011, in the Eastern District of Arkansas,

MICHAEL MYERS

knowingly and intentionally possessed with intent to distribute and distributed at least 5 grams, but less than 50 grams of methamphetamine (actual), a Schedule II controlled substance, thereby violating Title 21, United States Code, sections 841(a)(1) and (b)(1)(B).

COUNT 9

On or about February 22, 2011, in the Eastern District of Arkansas,

DANIEL HENRY, JR.

knowingly and intentionally possessed with intent to distribute and distributed at least 5 grams, but less than 50 grams of methamphetamine (actual), a Schedule II controlled substance, thereby violating Title 21, United States Code, sections 841(a)(1) and (b)(1)(B).

COUNT 10

On or about March 15, 2011, in the Eastern District of Arkansas,

JASON HOLMES

knowingly and intentionally possessed with intent to distribute and distributed at least 5 grams, but less than 50 grams of methamphetamine (actual), a Schedule II controlled substance, thereby violating Title 21, United States Code, sections 841(a)(1) and (b)(1)(B).

COUNT 11

On or about March 25, 2011, in the Eastern District of Arkansas,

BRENT AMADEN

knowingly and intentionally possessed with intent to distribute at least 5 grams, but less than 50 grams of methamphetamine (actual), a Schedule II controlled substance, thereby violating Title 21, United States Code, sections 841(a)(1) and (b)(1)(B).

COUNT 12

On or about March 25, 2011, in the Eastern District of Arkansas,

BRENT AMADEN

in furtherance of a drug trafficking crime for which he can be prosecuted in a court of the United States, to wit, possession with intent to distribute methamphetamine as charged in Count 11 of this indictment, knowingly possessed one or more of the following firearms: one Beretta Semi-automatic pistol, serial number BER022859M and one Marlin Firearms Co., .22 caliber rifle, serial number 96484464, in violation of Title 18, United States Code, section 924(c)(1)(A)(i).

COUNT 13

On or about April 1, 2011, in the Eastern District of Arkansas,

JOHN HENRY YOUNGBLOOD, JR.

knowingly and intentionally possessed with intent to distribute less than 50 grams of a mixture or substance containing methamphetamine, a Schedule II controlled substance, thereby violating Title 21, United States Code, sections 841(a)(1) and (b)(1)(C).

COUNT 14

On or about April 3, 2011, in the Eastern District of Arkansas,

PAUL CRISWELL

knowingly and intentionally possessed with intent to distribute at least 5 grams, but less than 50 grams of methamphetamine (actual), a Schedule II controlled substance, thereby violating Title 21, United States Code, sections 841(a)(1) and (b)(1)(B).

COUNT 15

On or about April 15, 2011, in the Eastern District of Arkansas,

OATHER LEE FULMER aka LEBO

knowingly and intentionally possessed with intent to distribute and distributed less than 50 grams of a mixture or substance containing methamphetamine, a Schedule II controlled substance, thereby violating Title 21, United States Code, sections 841(a)(1) and (b)(1)(C).

COUNT 16

From in or about March, 2011 to on or about June 7, 2011, in the Eastern District of Arkansas

JENNIFER MIZE

having knowledge of a crime that can be prosecuted in the United States District Court for the Eastern District of Arkansas, to wit: conspiracy to possess with intent to distribute a controlled substance, methamphetamine, under Title 21, United States Code, sections 841(a)(1) and 846, as

charged in Count 1, did knowingly and intentionally conceal such criminal activity and fail to as soon as possible make known the same criminal activity to some judge or other person in civil or military authority under the United States, in violation of Title 18, United States Code, section 4.

COUNT 17

From in or about March, 2011 to on or about June 7, 2011, in the Eastern District of Arkansas

MARGARET DIANN HENRY

having knowledge of a crime that can be prosecuted in the United States District Court for the Eastern District of Arkansas, to wit: conspiracy to possess with intent to distribute a controlled substance, methamphetamine, under Title 21, United States Code, sections 841(a)(1) and 846 as charged in Count 1, did knowingly and intentionally conceal such criminal activity and fail to as soon as possible make known the same criminal activity to some judge or other person in civil or military authority under the United States, in violation of Title 18, United States Code, section 4.

COUNT 18

On or about December 20, 2010, in the Eastern District of Arkansas,

DUSTIN DYER

knowingly and intentionally used a communications facility, to wit, the telephone, with the intent to commit a felony offense, conspiracy to distribute methamphetamine, a violation of Title 21, United States Code, Section 841(a)(1) and 846, all in violation of Title 21, United States Code, Section 843(b).

FORFEITURE ALLEGATION 1

Upon conviction of a controlled substance offense set forth in Count 1 of this Indictment,

CHRISTIAN MALDONADO aka PRIMO, shall forfeit to the United States pursuant to 21 U.S.C. § 853 any property constituting or derived from, proceeds obtained directly or indirectly from the drug trafficking, including but not limited to the following:

A sum of money in the amount of \$2,000,000 representing the amount of proceeds obtained as a result of the drug trafficking charged in Count 1, and all interests and proceeds traceable thereto.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s):

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

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

#### FORFEITURE ALLEGATION 2

Upon conviction of a controlled substance offense set forth in Count 1 of this Indictment, GLADIS MALDONADO aka GLADIS GAMEROS, shall forfeit to the United States pursuant to 21 U.S.C. § 853 any property constituting or derived from, proceeds obtained directly or indirectly from the drug trafficking, including but not limited to the following:



A sum of money in the amount of \$2,000,000 representing the amount of proceeds obtained as a result of the drug trafficking charged in Count 1, and all interests and proceeds traceable thereto.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s):

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

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

### FORFEITURE ALLEGATION 3

Upon conviction of one or more controlled substance offense set forth in Counts 1, 5, 6, 7 and 9 of this Indictment, DANIEL HENRY, JR., shall forfeit to the United States pursuant to 21 U.S.C. § 853 any property constituting or derived from, proceeds obtained directly or indirectly from the drug trafficking, including but not limited to the following:

- 1) real property and all structures located at 1171 Webber Lane, Austin, Arkansas
- 2) one yellow H2 Hummer AR LPN 088 NIA
- 3) one black Corvette AR LPN 290 ORF
- 4) one black 2004 Chevrolet Tahoe AR LPN 189 OJD

- 5) one certificate of deposit, Centennial Bank account number 0800008825
- 6) one certificate of deposit, Centennial Bank account number 0800008826
- 7) one checking account, Centennial Bank account number 0000636113
- 8) A sum of money in the amount of \$2,000,000 representing the amount of proceeds obtained as a result of the drug trafficking charged in Count 1, and all interests and proceeds traceable thereto.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s):

- (a) cannot be located upon the exercise of due diligence;
  - (b) has been transferred or sold to, or deposited with, a third party;
  - (c) has been placed beyond the jurisdiction of the court;
  - (d) has been substantially diminished in value; or
  - (e) has been commingled with other property which cannot be divided without difficulty;
- it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

#### FORFEITURE ALLEGATION 4

Upon conviction of a controlled substance offense set forth in Count 1 of this Indictment, REBECCA HENRY, shall forfeit to the United States pursuant to 21 U.S.C. § 853 any interest she has in property constituting or derived from, proceeds obtained directly or indirectly from the drug trafficking, including but not limited to the following:

- 1) real property and all structures located at 1171 Webber Lane, Austin, Arkansas

- 2) one yellow H2 Hummer AR LPN 088 NIA
- 3) one black Corvette AR LPN 290 ORF
- 4) one black 2004 Chevrolet Tahoe AR LPN 189 OJD
- 5) one certificate of deposit, Centennial Bank account number 0800008825
- 6) one certificate of deposit, Centennial Bank account number 0800008826
- 7) one checking account, Centennial Bank account number 0000636113
- 8) A sum of money in the amount of \$2,000,000 representing the amount of proceeds obtained as a result of the drug trafficking charged in Count 1, and all interests and proceeds traceable thereto.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s):

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

#### FORFEITURE ALLEGATION 5

Upon conviction of the offense alleged in Count 12 of this Indictment, BRENT AMADEN, shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C.

§2461(c), all firearms and ammunition and any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said violations, including, but not limited to, the following: one Beretta Semi-automatic pistol, serial number BER022859M, one Marlin Firearms Co., .22 caliber rifle, serial number 96484464, and all ammunition seized on March 25, 2011.

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