

SECRET

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

EVAN B. MARSHALL (01)

[DOB: 09/02/1997],

CAMREN JOSEPH DAVIS (02)

[DOB: 02/22/1997],

CODY RYDER (03)

[DOB: 08/05/1991],

LESLIE ICE (04)

[DOB: 11/12/1984],

DANIELLE ICE (05)

[DOB: 01/09/1988],

ERIC KALTENBACH (06)

[DOB: 11/12/1984],

and

ENX KHOSHABA (07)

[DOB: 11/13/1992],

Defendants.

MARSHALL (01): Counts 1, 2, 4

DAVIS (02): Counts 1 and 3

RYDER (03): Count 1

L. ICE (04): Count 1

D. ICE (05): Count 1

KALTENBACH (06): Count 1

KHOSHABA (07): Count 1

Case No. 21-3144-01-07-CR-S-MDH

COUNT 1

18 U.S.C. § 371

(Conspiracy)

NMT 5 Years Imprisonment

NMT 3 Years Supervised Release

NMT \$250,000 Fine

Class D Felony

COUNT 2 and 3

18 U.S.C. § 2314

(Interstate Transportation of Stolen Property)

NMT 10 Years Imprisonment

NMT 3 Years Supervised Release

NMT \$250,000 Fine

Class C Felony

COUNT 4

26 U.S.C. § 5861(d)

(Possession of an Unregistered Firearm)

NMT 10 Years Imprisonment

NMT 3 Years Supervised Release

NMT \$10,000 Fine

Class C Felony

Each Count: \$100 Special Assessment

FORFEITURE ALLEGATION:

18 U.S.C. § 981(a)(1)(C)

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

At all times material to this Superseding Indictment, unless otherwise set forth, with all dates and times alleged to be “on or about” or “in or about,” and all amounts alleged to be “approximately:”

GENERAL ALLEGATIONS

Introduction and Background

1. Automotive parts that can be recycled are commonly called “cores.” Catalytic converters are an automotive core.

2. A catalytic converter is an exhaust emission control device that reduces the amount of toxic gas produced by motor vehicles. Catalytic converters have been mandated for all cars and trucks since 1975. Catalytic converters are located underneath the vehicle near the engine exhaust manifold. Catalytic converters contain metals like platinum, palladium, and rhodium. Used catalytic converters are taken to recycling businesses where the metals are removed and resold.

3. Catalytic converters are an easy mark for thieves, in part, because they can be cut from a vehicle with just a battery powered reciprocating saw, often without the need to put the vehicle on jacks. Then, once a catalytic converter is detached from its originating vehicle, it is difficult to trace because catalytic converters were marked, if at all, with only a serial number that may identify the year, make, and model of the originating vehicle.

4. In response to catalytic converter thefts, states like Missouri passed laws requiring purchasers of catalytic converters to obtain state or federal identification from sellers, as well as other information, including the license plate of the vehicle the seller used during the transaction. The collection and retention of this information deters the sale of stolen catalytic converters and assists law enforcement in apprehending thieves who steal catalytic converters, respectively.

The Purchase of Catalytic Converters Under Missouri Law

5. Pursuant to Mo. Rev. Stat. § 407.300.1, “Every purchaser...who obtains items for resale or profit shall keep a register containing a written or electronic record for each purchase or trade in which each type of material subject to the provisions of [Mo. Rev. State. § 407.300] is obtained for value. There shall be a separate record for each transaction involving any: ...(4) detached catalytic converter[.]”

6. Pursuant to Mo. Rev. Stat. § 407.300.2, every purchaser of a detached catalytic converter was required to maintain a record for each transaction that contained at least the following: “(1) A copy of the driver’s license or photo identification issued by the state or by the United States government or agency thereof to the person from whom the material is obtained; (2) The current address, gender, birth date, and a photograph of the person from whom the material is obtained if not included or are different from the identification required in subdivision (1) of this subsection; (3) The date, time, and place of the transaction; (4) The license plate number of the vehicle used by the seller during the transaction; (5) A full description of the metal, including the weight and purchase price.”

Business Entities

7. Company A was an Arkansas limited liability company located in Cherry Valley, Cross County, Arkansas in the Eastern District of Arkansas, that purchased and sold automotive cores, including catalytic converters.

8. Company B was a Missouri limited liability company located in Farmington, St. Francois County, Missouri in the Eastern District of Missouri, that was organized for the purpose of “automotive core supply.” Company B purchased automotive cores, including catalytic converters.

9. Company C was an Arkansas limited liability company located in Mountain Home, Baxter County, Arkansas in the Western District of Arkansas, that purchased and sold automotive cores, including catalytic converters.

10. Company D was a Missouri limited liability company located in Rogersville, Greene County, Missouri, in the Western District of Missouri, that purchased and sold automotive cores, including catalytic converters.

11. Company E was a Missouri limited liability company located in Rogersville, Greene County, Missouri in the Western District of Missouri, that purchased and sold automotive cores, including catalytic converters.

Persons

12. PERSON 1, a resident of Mountain Home, Arkansas, in the Western District of Arkansas, was an organizer, manager, and co-owner of Company C.

13. PERSON 2, a resident of Mountain Home, Arkansas, in the Western District of Arkansas, was an organizer, manager, and co-owner of Company C.

14. Defendant **EVAN B. MARSHALL** (“MARSHALL”), a resident of Rogersville, Missouri, was the organizer and owner of Company D. MARSHALL ostensibly created Company D for the purpose of recycling and operated the business from his home residence, East Farm Road 186, Rogersville, Greene County, Missouri (“Marshall’s residence”) in the Western District of Missouri and bought stolen catalytic converters.

15. From at least December 2019 through February 2021, Defendant **CAMREN JOSEPH DAVIS** (“DAVIS”), a resident of Rogersville, Missouri, in the Western District of Missouri, worked for MARSHALL and bought stolen catalytic converters on MARSHALL’s behalf.

16. In February 2021, DAVIS organized Company E. DAVIS ostensibly created Company E “to buy and sell junk cars and any other automotive core.”

17. Defendant **CODY RYDER** (“RYDER”), a resident of Springfield, Missouri, in the Western District of Missouri, worked for MARSHALL from February 2021 through October 15, 2021, and bought stolen catalytic converters on MARSHALL’s behalf.

18. Defendant **LESLIE ICE** (“L. ICE”), a resident of Springfield, Missouri and Jefferson City, Missouri, both in the Western District of Missouri, stole catalytic converters in Springfield and elsewhere and sold the stolen catalytic converters to MARSHALL.

19. Defendant **DANIELLE ICE** (“D. ICE”), a resident of Springfield, Missouri and Jefferson City, Missouri, both in the Western District of Missouri, stole catalytic converters in Springfield and elsewhere and sold the stolen catalytic converters to MARSHALL.

20. Defendant **ERIC KALTENBACH** (“KALTENBACH”), a resident of Springfield, Missouri, in the Western District of Missouri, stole catalytic converters in Springfield and elsewhere and sold the stolen catalytic converters to MARSHALL, DAVIS, and RYDER.

21. Defendant **ENX KHOSHABA** (“KHOSHABA”), a resident of Springfield, Missouri, stole catalytic converters in Springfield and elsewhere and sold the stolen catalytic converters to MARSHALL and RYDER.

Relevant Financial Institutions and Accounts

22. First Financial Bank (“First Financial”) was a bank headquartered in El Dorado, Arkansas. Company A owned and controlled a checking account under Company A’s name with First Financial, number ending 1333.

23. New Era Bank (“New Era”) was a bank headquartered in Fredricktown, Missouri. Company B owned and controlled a checking account under Company B’s name with New Era, number ending 2725.

24. Anstaff Bank (“Anstaff”) was a bank headquartered in Green Forest, Arkansas, with branch offices located throughout Arkansas. Company C owned and controlled a checking account under Company C’s name with Anstaff Bank, number ending 3068. PERSON 1 and PERSON 2 controlled this account.

25. Citizens Bank of Rogersville (“CBOR”) was a bank headquartered Rogersville, Missouri, within the Western District of Missouri, with two locations in Rogersville, Missouri. MARSHALL owned and controlled a checking account under his name with Citizens Bank of Rogersville, number ending 8906.

Buying and Selling Catalytic Converters

26. For several years prior to 2019, MARSHALL bought junk vehicles and scrapped them out by selling the vehicle’s constituent parts, including catalytic converters.

27. Prior to meeting MARSHALL, PERSON 1 and PERSON 2 traveled to Springfield and the surrounding area to buy catalytic converters. In the fall of 2019, PERSON 1 and PERSON 2 asked MARSHALL to buy catalytic converters from Springfield and the surrounding area and then sell them to PERSON 1 and PERSON 2.

28. In December 2019, PERSON 1 and PERSON 2 began wiring funds from Company C’s Anstaff account to MARSHALL’s CBOR account.

29. Beginning at least in December 2019, in addition to selling PERSON 1 and PERSON 2 catalytic converters from junk vehicles that he had purchased from salvage yards,

MARSHALL began to buy stolen catalytic converters and sell them to PERSON 1 and PERSON 2.

30. From at least December 2019, through July 2020, PERSON 1 and PERSON 2 sold catalytic converters that they purchased from MARSHALL to Company A. Between December 4, 2019 and July 14, 2020, Company A paid PERSON 1 and PERSON 2 \$3,247,135 by wire transfers from Company A's First Financial account to Company C's Anstaff bank account.

31. By July 2020, PERSON 1 and PERSON 2 transitioned to selling the catalytic converters they purchased, including those purchased from MARSHALL, to Company B.

32. Company B had an online application that allowed core buyers, like PERSON 1, PERSON 2, and MARSHALL, and later, DAVIS, and RYDER, to price catalytic converters ("Company B App") based upon what Company B would pay for a particular catalytic converter (for example, a 2013 Toyota Prius). The Company B App was not available to the general public and required permission from Company B in order to obtain a login ID and password to access the Company B App. In particular, the Company B App allowed those who Company B permitted access to determine the United States dollar value that Company B would pay for a particular catalytic converter. Further, the user could use the Company B App to set his or her profit margin by setting the Company B App to display the catalytic converter values at a selected percentage of the amount Company B would pay for the catalytic converter.

33. Company B allowed PERSON 1, PERSON 2, MARSHALL, DAVIS, and RYDER access to the Company B App. Once Company B gave MARSHALL, DAVIS, and RYDER access to the Company B App, they used it almost exclusively when purchasing and selling catalytic converters.

34. Prior to being granted access to the Company B App, when purchasing catalytic converters, MARSHALL, DAVIS, and RYDER relied upon internet sources, shared lists, and their knowledge gained by experience regarding the value of a particular catalytic converter.

35. Between June 2020 and October 2021, Company B paid Company C more than \$18 million by 147 separate wire transfers from Company B's New Era account to Company C's Anstaff account.

36. From December 2019 through October 2021, PERSON 1 and PERSON 2 purchased tens of thousands of catalytic converters from MARSHALL. Approximately thirty-two percent of the catalytic converters that PERSON 1 and PERSON 2 sold to Company A and Company B during this time were purchased from MARSHALL.

37. As early as January 2020, MARSHALL was aware that a large number of catalytic converters were being stolen in Springfield, Missouri. On January 10, 2020, PERSON 1 text messaged MARSHALL, "There are to[sic] many thefts in Springfield[.] You had better make sure none of you're [sic] safe [sic] stolen...Make sure you ask for ID Evan...Or don't buy them...if it seems fishy walk away..."

38. When purchasing catalytic converters, MARSHALL, DAVIS, and RYDER did not collect the information and retain the records required by Missouri law when purchasing catalytic converters.

COUNT 1
18 U.S.C. § 371
(Conspiracy)

39. The allegations set forth in paragraphs 1 through 38 and 50 through 76 of this Superseding Indictment are hereby re-alleged and incorporated by reference as if fully set forth herein.

40. Beginning on an unknown date, but at least as early as December 12, 2019, and continuing through at least October 15, 2021, said dates being approximate, in the Western District of Missouri and elsewhere, the defendants, **EVAN B. MARSHALL, CAMREN JOSEPH DAVIS, CODY RYDER, LESLIE ICE, DANIELLE ICE, ERIC KALTENBACH,** and **ENX KHOSHABA**, knowingly and intentionally combined, conspired, confederated and agreed with each other and others, both known and unknown to the grand jury, to commit the crime of interstate transportation of stolen property, contrary to the provisions of Title 18, United States Code, Section 2314, all in violation of Title 18, United States Code, Section 371.

Manner and Means

41. The members of the conspiracy used various manners and means to effect the objects and purposes of the conspiracy, including but not limited to the following:

42. In furtherance of the conspiracy, Defendants MARSHALL and DAVIS knowingly transported and transferred, in interstate commerce, goods, wares and merchandise, that is stolen catalytic converters, of an aggregate value of \$5,000 or more, knowing the same to be stolen, converted, and taken by fraud.

43. In furtherance of the conspiracy, MARSHALL received more than \$6.8 million from COMPANY C, which was, in part, payment for stolen catalytic converters that MARSHALL sold to PERSON 1 and PERSON 2 after transporting stolen catalytic converters from Rogersville, Missouri, to Mountain Home Arkansas.

44. In furtherance of the conspiracy, MARSHALL withdrew more than \$6.4 million in cash from his CBOR account and used the cash, in part, to promote future purchases of stolen catalytic converters.

45. In furtherance of the conspiracy, Defendants L. ICE, D. ICE, KALTENBACH, KHOSHABA, and others, known and unknown to the grand jury, stole catalytic converters from vehicles in the Springfield, Missouri area and elsewhere, and sold the stolen catalytic converters to MARSHALL, DAVIS, and RYDER.

46. In furtherance of the conspiracy, MARSHALL provided DAVIS, RYDER, and others known and unknown to the grand jury, thousands of dollars in cash from the proceeds of previous interstate transportation of stolen catalytic converters to promote future purchases of stolen catalytic converters and the continuity of the conspiracy.

47. In furtherance of the conspiracy, MARSHALL routinely stored stolen catalytic converters at Marshall's residence, for a period of time until he, RYDER, DAVIS, and others known and unknown to the grand jury, would load the stolen catalytic converters onto trailers in preparation for their transport to Company C in Mountain, Home Arkansas.

48. In furtherance of the conspiracy, approximately every two to three weeks, MARSHALL transported between 800 and 1,200 catalytic converters, to Company C in Mountain Home, Arkansas. The transports included stolen catalytic converters that DAVIS and RYDER had purchased on MARSHALL's behalf, as well as stolen catalytic converters MARSHALL purchased directly from catalytic converter thieves, including L. ICE, D. ICE, KALTENBACH, and KHOSHABA.

49. In furtherance of the conspiracy, upon delivery of stolen catalytic converters, MARSHALL received payment from PERSON 1 and PERSON 2 for the stolen catalytic converters by wire transfer from Company C's Anstaff account to MARSHALL's CBOR account.

Overt Acts

50. In furtherance of the conspiracy and to effect its objects, the defendants and others, known and unknown to the grand jury, committed and caused to be committed the following overt acts, among others, in the Western District of Missouri and elsewhere:

51. On December 12, 2019, MARSHALL created Company D, in order to provide the appearance of a legitimate business for his purchase, transportation, and sale of stolen catalytic converters.

52. On August 3, 2020, DAVIS texted MARSHALL twice, writing “Is there any way I can meet you for more cash,” and “Not trying to blow your shit up dude but I don’t have enough money for the day.”

53. On August 14, 2020, MARSHALL withdrew \$40,000 in cash from his CBOR account, and used a substantial portion of the cash to purchase stolen catalytic converters and to advance DAVIS cash, also, in part, for the purchase of stolen catalytic converters.

54. On August 21, 2020, DAVIS and MARSHALL had a text message exchange discussing MARSHALL leaving DAVIS \$40,000 in cash relating to the purchase of, and sale of, stolen catalytic converters.

55. On October 26, 2020, MARSHALL withdrew \$30,000 in cash from his CBOR account, and used a substantial portion of it to purchase stolen catalytic converters and to advance DAVIS cash, also, in part, for the purchase of stolen catalytic converters.

56. On October 27, 2020, DAVIS and MARSHALL had a text message exchange in which DAVIS offered to sell MARSHALL catalytic converters, some of which both had reason to believe had been stolen.

57. On October 29, 2020, MARSHALL texted DAVIS, “Hey bring your cats you got to my place by 2:30 today,” referring to catalytic converters.

58. On November 30, 2020, MARSHALL paid L. ICE and D. ICE \$300 for stolen catalytic converters.

59. On January 19, 2021, MARSHALL provided D. Ice \$1,500 to pay L. ICE’s bond, in part so that L. ICE could continue to steal catalytic converters and sell them to MARSHALL.

60. On February 13, 2021, MARSHALL texted DAVIS regarding stolen catalytic converters. MARSHALL sent DAVIS a picture of a pickup that appeared to have been captured on surveillance cameras stealing converters. MARSHALL wrote to DAVIS: “Stole a bunch of cats off kearny btw, if you find em you can just take them from him [laughing emoji].”

61. On or about February 14, 2021, MARSHALL texted RYDER “...just FYI I’m gone till Tuesday but I’ve got guys around that can get you cash and get the cats if needed.”

62. On February 17, 2021, MARSHALL texted DAVIS in order to have DAVIS bring him catalytic converters so that they could be transported to Company C in Mountain Home, Arkansas and sold to PERSON 1 and PERSON 2.

63. On February 22, 2021, RYDER texted MARSHALL to determine the price RYDER should pay for a catalytic converter. RYDER provided MARSHALL a picture of the catalytic converter to determine its value. MARSHALL responded, “I wouldn’t give much more than 250 for it if even that, that’s a stoleo for sure lol.” “Stoleo” is slang for “stolen.” RYDER later responded, “OK I bought it from joe.”

64. On or about June 22, 2021, RYDER texted Marshall, “I’m out of money.” MARSHALL responded, “I got you bud I got 50 grand on me.”

65. On July 5, 2021, MARSHALL purchased stolen catalytic converters from an undercover agent (“UCA”) and paid the UCA \$1,030 in cash. During the transaction, the UCA told MARSHALL that his work required him to travel around the country and that he picked up catalytic converters before he left a town. Marshall responded, “you don’t shit where you eat.” Further, after the UCA told MARSHALL of his/her intention to steal catalytic converters from a car lot in Louisiana, MARSHALL stated to the UCA, “If you have any questions, just holler. My only thing is, is everything that you bring me, I’m gonna assume is off of a vehicle that you bought. You know what I’m sayin’? I don’t, I don’t like to discuss it. I don’t care. I don’t care. I really don’t. But [...] yeah, I don’t ever wanna discuss it.”

66. On August 3, 2021, MARSHALL transported a trailer containing stolen catalytic converters from MARSHALL’s residence to Mountain Home, Arkansas.

67. On August 12, 2021, PERSON 1 and PERSON 2 sent an employee of Company C to MARSHALL’s residence to pick up a trailer that contained stolen catalytic converters. The employee then transported the trailer containing stolen catalytic converters to Company C in Mountain Home, Arkansas. PERSON 1 and PERSON 2 later paid MARSHALL, by wire transfers from Company C’s Anstaff account to MARSHALL’s CBOR account, on August 13, 2021 (\$100,000); August 13, 2021 (\$16,899); and August 18, 2021, (\$100,000) for the August 12, 2021 shipment.

68. During the late evening of August 16, 2021, and the early morning of August 17, 2021, KALTENBACH texted RYDER before and after he stole four catalytic converters and sold them to RYDER and MARSHALL, discussing meeting in order to conduct the sale.

69. On August 22, 2021, KALTENBACH texted MARSHALL to facilitate the sale of a stolen catalytic converter.

70. Also on August 22, 2021, at MARSHALL's residence, MARSHALL bought a stolen catalytic converter from KALTENBACH that MARSHALL had reason to believe was stolen.

71. On August 25, 2021, KALTENBACH again texted RYDER to facilitate the sale of stolen catalytic converters, which led to the eventual sale of stolen catalytic converters.

72. On September 7, 2021, MARSHALL transported a trailer containing stolen catalytic converters from MARSHALL's residence to Mountain Home, Arkansas.

73. On October 7, 2021, RYDER purchased a stolen catalytic converter from KHOSHABA.

74. On at least two occasions, KHOSHABA went to MARSHALL's residence and sold MARSHALL stolen catalytic converters while at MARSHALL's residence.

75. On September 14, 2021, MARSHALL posted to his Facebook account a photo of a large metal bin filled to the top with catalytic converters. The post read: "If any of y'all have converters, it would be best to get them in this week, we are seeing a major major drop in prices."

76. During the late evening of October 14, 2021, or the early morning of October 15, 2021, MARSHALL learned of an impending law enforcement action and moved 197 catalytic converters from Marshall's residence to another location in order to conceal the catalytic converters from law enforcement.

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

COUNT 2
18 U.S.C. § 2314
(Interstate Transportation of Stolen Property)

77. The allegations set forth in paragraphs 1 through 76 of this Superseding Indictment are hereby re-alleged and incorporated by reference as if fully set forth herein.

78. Between December 12, 2019, and October 15, 2021, said dates being approximate, in the Western District of Missouri and elsewhere, the defendant, **EVAN B. MARSHALL**, did unlawfully transport, transmit, and transfer in interstate commerce from Rogersville, Missouri to Mountain Home, Arkansas, stolen goods, wares and merchandise, that is, stolen catalytic converters, of an aggregate value of \$5,000 or more, knowing the same to be have been stolen, converted, and taken by fraud, all in violation of Title 18, United States Code, Section 2314.

COUNT 3

18 U.S.C. § 2314

(Interstate Transportation of Stolen Property)

79. The allegations set forth in paragraphs 1 through 76 of this Superseding Indictment are hereby re-alleged and incorporated by reference as if fully set forth herein.

80. Between December 12, 2019, and October 15, 2021, said dates being approximate, in the Western District of Missouri and elsewhere, the defendant, **CAMREN JOSEPH DAVIS**, did unlawfully transport, transmit, and transfer in interstate commerce from Rogersville, Missouri to Mountain Home, Arkansas stolen goods, wares and merchandise, that is, stolen catalytic converters, of an aggregate value of \$5,000 or more, knowing the same to be have been stolen, converted, and taken by fraud, all in violation of Title 18, United States Code, Section 2314.

COUNT 4

26 U.S.C. § 5861(d)

(Possession of an Unregistered Firearm)

81. On or about October 15, 2021, said date being approximate, in Greene County, in the Western District of Missouri, the defendant, **EVAN B. MARSHALL**, knowingly received and possessed a firearm, that is, a Springfield Model 947E, .410 gauge, short-barrel shotgun, no serial number, as defined in Title 26, United States Code, Section 5845(a), specifically, a weapon made from a shotgun having an overall length of less than 26 inches and a barrel having a length of less

than 18 inches, which firearm was not then registered to him in the National Firearms Registration and Transfer Record, in violation of Title 26, United States Code, Sections 5841, 5845(a) and (d), 5861(d) and 5871.

FORFEITURE ALLEGATION

82. The factual allegations of Paragraphs 1 through 80 of the Superseding Indictment are hereby re-alleged and fully incorporated herein for the purpose of alleging forfeitures to the United States, pursuant to the provisions of Title 18, United States Code, Sections 981(a)(1)(C) and Title 28, United States Code, Section 2461.

83. As a result of the offenses alleged in Counts One through Three of this Superseding Indictment, and pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461, the defendants, **EVAN B. MARSHALL, CAMREN JOSEPH DAVIS, CODY RYDER, LESLIE ICE, DANIELLE ICE, ERIC KALTENBACH, and ENX KHOSHABA**, shall forfeit to the United States all property, real and personal, constituting, or derived from, proceeds traceable to the offenses, directly or indirectly, as a result of the violations of law.

Money Judgment

84. A money judgment representing proceeds obtained by the defendants, **EVAN B. MARSHALL, CAMREN JOSEPH DAVIS, CODY RYDER, LESLIE ICE, DANIELLE ICE, ERIC KALTENBACH, and ENX KHOSHABA**, in that the sum in aggregate, constitutes, or is derived from, proceeds traceable to the offenses set forth in Counts One through Three of the Superseding Indictment.

Substitute Assets

85. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred, 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 intention of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of forfeitable property.

A TRUE BILL.

/s/ Monica Stone

FOREPERSON OF THE GRAND JURY

/s/ Shannon Kempf

SHANNON T. KEMPF

Missouri Bar No: 61060

Assistant United States Attorney

DATED: 01/25/2022