

1 MCGREGOR W. SCOTT
United States Attorney
2 GRANT B. RABENN
PAUL A. HEMESATH
3 Assistant United States Attorneys
501 I Street, Suite 10-100
4 Sacramento, CA 95814
Telephone: (916) 554-2700
5 Facsimile: (916) 554-2900

FILED

MAR - 7 2019

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY ak DEPUTY CLERK

6 Attorneys for Plaintiff
7 United States of America

8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,
12 Plaintiff,

13 v.

14 JASON KEITH ARNOLD,
DAVID LEE WHITE, and
15 ALICIA MARIE MCCOY

16 Defendants.

CASE NO. 2: 19 - CR - 0043 MCE

VIOLATIONS:

21 U.S.C. §§ 846 and 841(a)(1)– Conspiracy to
Distribute a Controlled Substance;
21 U.S.C. § 841(a)(1) – Distribution of a Controlled
Substance (4 Counts); and
21 U.S.C. § 853(a) – Criminal Forfeiture

18 INDICTMENT

19 COUNT ONE: [21 U.S.C. §§ 846 and 841 (a)(1) – Conspiracy to Distribute a Controlled Substance]

20 The Grand Jury charges:

21 JASON KEITH ARNOLD,
22 DAVID LEE WHITE, and
23 ALICIA MARIE MCCOY,

24 defendants herein, as follows:

25 Beginning at a time unknown but no later than in or around December 2017, and continuing
26 through on or about February 21, 2019, in the County of Sacramento, State and Eastern District of
27 California, and elsewhere, including the County of Maricopa, State and District of Arizona, did conspire
28 with other persons, known and unknown to the Grand Jury, to knowingly and intentionally

1 distribute at least one kilogram of a mixture and substance containing a detectable amount of heroin, a
2 Schedule I controlled substance, and at least 500 grams of a mixture and substance containing a
3 detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21,
4 United States Code, Sections 846 and 841(a)(1) & (b)(1)(A).

5 COUNT TWO: [21 U.S.C. § 841(a)(1) – Distribution of a Controlled Substance]

6 The Grand Jury further charges:

7 JASON KEITH ARNOLD,
8 DAVID LEE WHITE, and
9 ALICIA MARIE MCCOY,

10 defendants herein, as follows:

11 Beginning at a time unknown, but no later than on or about May 23, 2018, and continuing to on
12 or about June 12, 2018, in the County of Sacramento, within the State and Eastern District of California,
13 and elsewhere, did knowingly and intentionally distribute heroin, a Schedule I controlled substance, in
14 violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

15 COUNT THREE: [21 U.S.C. § 841(a)(1) – Distribution of a Controlled Substance]

16 The Grand Jury further charges: T H A T

17 JASON KEITH ARNOLD,
18 DAVID LEE WHITE, and
19 ALICIA MARIE MCCOY,

20 defendants herein as follows:

21 Beginning at a time unknown, but no later than on or about July 25, 2018, and continuing to on
22 or about July 28, 2018, in the County of Sacramento, within the State and Eastern District of California,
23 and elsewhere, did knowingly and intentionally distribute heroin, a Schedule I controlled substance, in
24 violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

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1 COUNT FOUR: [21 U.S.C. § 841(a)(1)– Distribution of a Controlled Substance]

2 The Grand Jury further charges:

3 JASON KEITH ARNOLD,
4 DAVID LEE WHITE, and
ALICIA MARIE MCCOY,

5 defendants herein, as follows:

6 Beginning at a time unknown, but no later than on or about October 17, 2018, and continuing to
7 on or about October 22, 2018, in the County of Sacramento, within the State and Eastern District of
8 California, and elsewhere, did knowingly and intentionally distribute heroin, a Schedule I controlled
9 substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States
10 Code, Section 2.

11 COUNT FIVE: [21 U.S.C. § 841(a)(1) & (b)(1)(C) – Distribution of a Controlled Substance]

12 The Grand Jury further charges:

13 JASON KEITH ARNOLD,
14 DAVID LEE WHITE, and
ALICIA MARIE MCCOY,

15 defendants herein, as follows:

16 Beginning at a time unknown, but no later than on or about December 18, 2018, and continuing
17 to on or about December 22, 2018, in the County of Sacramento, within the State and Eastern District of
18 California, and elsewhere, did knowingly and intentionally distribute heroin, a Schedule I controlled
19 substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States
20 Code, Section 2.

21 FORFEITURE ALLEGATION: [21 U.S.C. § 853(a) – Criminal Forfeiture]

22 1. Upon conviction of one or more of the offenses alleged in Counts One through Five of
23 this Indictment, defendants JASON KEITH ARNOLD, DAVID LEE WHITE, and ALICIA MARIE
24 MCCOY shall forfeit to the United States pursuant to Title 21, United States Code, Section 853(a), the
25 following property:

26 a. All right, title, and interest in any and all property involved in violations of Title
27 21, United States Code, Section 841(a)(1) and (b)(1), or conspiracy to commit such offenses, for which
28

United States v. Jason Keith Arnold et al.
Penalties for Indictment

Defendants

JASON KEITH ARNOLD
DAVID LEE WHITE
ALICIA MARIE MCCOY

COUNT 1: ALL DEFENDANTS

VIOLATION: 21 U.S.C. §§ 846, 841(a)(1) & (b)(1)(A) - Conspiracy to Distribute a Controlled Substance

PENALTIES: Mandatory minimum of 10 years in prison and a maximum of up to life in prison; or
Fine of up to \$10,000,000; or both fine and imprisonment
Supervised release of at least 5 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNTS 2 - 5: ALL DEFENDANTS

VIOLATION: 21 U.S.C. § 841(a)(1) & (b)(1)(C) – Distribution of a Controlled Substance

PENALTIES: Maximum of 20 years in prison; or
Fine of up to \$1,000,000; or both fine and imprisonment
Mandatory 3 years supervised release

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

FORFEITURE ALLEGATION: ALL DEFENDANTS

VIOLATION: 21 U.S.C. § 853(a) - Criminal Forfeiture

PENALTIES: As stated in the charging document

No. _____

UNITED STATES DISTRICT COURT

Eastern District of California

Criminal Division

THE UNITED STATES OF AMERICA

vs.

**JASON KEITH ARNOLD,
DAVID LEE WHITE, and
ALICIA MARIE MCCOY**

INDICTMENT

VIOLATION(S):

21 U.S.C. §§ 846 & 841(a)(1) & (b)(1)(A) – Conspiracy to Distribute a Controlled Substance;
21 U.S.C. § 841(a)(1) & (b)(1)(C) – Distribution of a Controlled Substance [4 Counts]; and
21 U.S.C. § 853(a) – Criminal Forfeiture

A true bill,

/s/ Signature on file w/AUSA

Foreman.

Filed in open court this _____ *day*

of _____ *, A.D. 20* _____

Clerk.

Bail, \$ _____

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