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1 McGREGOR W. SCOTT United States Attorney **GRANT B. RABENN** FILED PAUL A. HEMESATH Assistant United States Attorneys 501 I Street, Suite 10-100 Sacramento, CA 95814 MAR - 7 2019Telephone: (916) 554-2700 CLERK, U.S. DISTRICT COURT Facsimile: (916) 554-2900 5 6 Attorneys for Plaintiff 7 United States of America 8 IN THE UNITED STATES DISTRICT COURT 9 EASTERN DISTRICT OF CALIFORNIA 10 11 CASE NO. 2: 1 9 - CR - 0 0 4 3 MCE UNITED STATES OF AMERICA, 12 Plaintiff, **VIOLATIONS:** 13 21 U.S.C. §§ 846 and 841(a)(1)—Conspiracy to v. Distribute a Controlled Substance; JASON KEITH ARNOLD, 21 U.S.C. § 841(a)(1) – Distribution of a Controlled Substance (4 Counts); and DAVID LEE WHITE, and 15 ALICIA MARIE MCCOY 21 U.S.C. § 853(a) – Criminal Forfeiture 16 Defendants. 17 18 INDICTMENT 19 <u>COUNT ONE</u>: [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 ALICIA MARIE MCCOY, 23 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

INDICTMENT

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distribute at least one kilogram of a mixture and substance containing a detectable amount of heroin, a 1 Schedule I controlled substance, and at least 500 grams of a mixture and substance containing a 2 detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, 3 United States Code, Sections 846 and 841(a)(1) & (b)(1)(A). 4 COUNT TWO: [21 U.S.C. § 841(a)(1) – Distribution of a Controlled Substance] 5 The Grand Jury further charges: 6 7 JASON KEITH ARNOLD, DAVID LEE WHITE, and 8 ALICIA MARIE MCCOY, defendants herein, as follows: 9 Beginning at a time unknown, but no later than on or about May 23, 2018, and continuing to on 10 or about June 12, 2018, in the County of Sacramento, within the State and Eastern District of California, 11 and elsewhere, did knowingly and intentionally distribute heroin, a Schedule I controlled substance, in 12 violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2. 13 COUNT THREE: [21 U.S.C. § 841(a)(1) – Distribution of a Controlled Substance] 14 The Grand Jury further charges: T H A T 15 16 JASON KEITH ARNOLD, DAVID LEE WHITE, and 17 ALICIA MARIE MCCOY, defendants herein as follows: 18 Beginning at a time unknown, but no later than on or about July 25, 2018, and continuing to on 19 or about July 28, 2018, in the County of Sacramento, within the State and Eastern District of California, 20 and elsewhere, did knowingly and intentionally distribute heroin, a Schedule I controlled substance, in 21 violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2. 22 23 /// 24 /// 25 /// 26 /// 27 /// 28 ///

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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, 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 14	JASON KEITH ARNOLD, 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 or		
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	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 25	MCCOY shall forfeit to the United States pursuant to Title 21, United States Code, Section 853(a), the		
23	following property:		

All right, title, and interest in any and all property involved in violations of Title

21, United States Code, Section 841(a)(1) and (b)(1), or conspiracy to commit such offenses, for which

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INDICTMENT

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Case 2:19-cr-00043-TLN Document 10 Filed 03/07/19 Page 4 of 6 defendants are convicted, and all property traceable to such property, including the following: all real or 1 personal property, which constitutes or is derived from proceeds obtained, directly or indirectly, as a 2 result of such offenses; and all property used, or intended to be used, in any manner or part to commit or 3 to facilitate the commission of the offenses. 4 A sum of money equal to the total amount of proceeds obtained as a result of the b. 5 offenses, or conspiracy to commit such offenses, for which defendants are convicted. 6 If any property subject to forfeiture, as a result of the offenses alleged in Counts One 7 through Five of this Indictment, for which defendants are convicted: 8 cannot be located upon the exercise of due diligence; 9 a. has been transferred or sold to, or deposited with, a third party; b. 10 has been placed beyond the jurisdiction of the court; 11 c. has been substantially diminished in value; or 12 d. has been commingled with other property which cannot be divided without 13 e. difficulty; 14 it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other 15 property of said defendants, up to the value of the property subject to forfeiture. 16 17 18 19 A TRUE BILL. 20 21 22

/s/ Signature on file w/AUSA

FOREPERSON

McGREGOR W. SCOTT United States Attorney

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INDICTMENT

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

-,	
	UNITED STATES DISTRICT COURT
	Eastern District of California
	Criminal Division
	THE UNITED STATES OF AMERICA
•	JASON KEITH ARNOLD,
	DAVID LEE WHITE, and ALICIA MARIE MCCOY
	<u>INDICTMENT</u>
	VIOLATION(S):
	341(a)(1) & (b)(1)(A) – Conspiracy to Distribute a Controlled Subs 1) & (b)(1)(C) – Distribution of a Controlled Substance [4 Counts]; 21 U.S.C. § 853(a) – Criminal Forfeiture
5.5.6. y 5.1.(a)(21 0.5.C. 8 655(a) — Criminal I offendie
A true bill,	/s/ Signature on file w/AUSA
	/s/ Signature on file w/AUSA
	/s/ Signature on file w/AUSA Foreman.

GPO 863 525

Clerk.

an Ch.

NO PROCESS NECESSARY