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May 12, 2022
CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

6 Attorneys for Plaintiff
United States of America
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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

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11 UNITED STATES OF AMERICA,

CASE NO. 2:22-cr-0100 JAM

12 Plaintiff,

21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to
Distribute and Possess with Intent to Distribute
Fentanyl and Methamphetamine; 18 U.S.C. § 1956(h)
– Conspiracy to Launder Money; 21 U.S.C. § 853(a)
and 18 U.S.C. § 982(a)(1) – Criminal Forfeiture

13 v.

14 HOLLY ADAMS and
DEVLIN HOSNER,

15 Defendants.
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18 INDICTMENT

19 COUNT ONE: [21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to Distribute and to Possess with Intent to
20 Distribute Fentanyl and Methamphetamine]

21 The Grand Jury charges: T H A T

22 HOLLY ADAMS and
DEVLIN HOSNER,

23 defendants herein, beginning on a date unknown, but not later than on or about May 2, 2021, and
24 continuing through on or about March 29, 2022, in the County of Sacramento, State and Eastern District
25 of California, and elsewhere, did conspire and agree with each other and with persons known and
26 unknown to the Grand Jury to knowingly and intentionally distribute and possess with intent to
27 distribute at least 400 grams of a mixture and substance containing a detectable amount of N-phenyl-N-
28 [1-(2-phenylethyl)-4-piperidinyl] propanamide, popularly known as “fentanyl,” a Schedule II

1 Controlled Substance; and at least 50 grams of methamphetamine (actual), a Schedule II Controlled
2 Substance; all in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

3 COUNT TWO: [18 U.S.C. § 1956(a)(1)(B)(i) and (h) – Conspiracy to Launder Money]

4 The Grand Jury further charges: T H A T

5 HOLLY ADAMS and
6 DEVLIN HOSNER,

7 defendants herein, beginning on a date unknown, but not later than on or about May 2, 2021, and
8 continuing through on or about March 29, 2022, in the County of Sacramento, State and Eastern District
9 of California, and elsewhere, did knowingly combine, conspire, and agree with each other and with
10 persons known and unknown to the Grand Jury to commit offenses against the United States in violation
11 of Title 18, United States Code, Section 1956, specifically: to conduct and attempt to conduct financial
12 transactions affecting interstate and foreign commerce through movement of funds by wire and other
13 means and involving one and more monetary instruments, which transactions involved the proceeds of
14 specified unlawful activity, that is, narcotics trafficking, in violation of Title 21, United States Code,
15 Sections 846 and 841(a)(1), knowing that the property involved in the financial transactions represented
16 the proceeds of some form of unlawful activity, and that while conducting and attempting to conduct
17 such financial transactions, knew that the transactions were designed in whole and in part to conceal and
18 disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful
19 activity, all in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i) and (h).

20 FORFEITURE ALLEGATION: [21 U.S.C. § 853(a) and 18 U.S.C. § 982(a)(1) – Criminal Forfeiture]

21 1. Upon conviction of the offense alleged in Count One of this Indictment, defendants
22 HOLLY ADAMS and DEVLIN HOSNER shall forfeit to the United States pursuant to Title 21, United
23 States Code, Section 853(a), any property constituting or derived from proceeds obtained, directly or
24 indirectly, as a result of such violation; and any property used, or intended to be used, in any manner or
25 part to commit or to facilitate the commission of the violation, including but not limited to the following:

- 26 a. Approximately \$214,842.60 seized from JP Morgan Chase Bank Account
27 Number 623081319;

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- b. 2021 Chevrolet Silverado 1500 Custom Truck, VIN: 1GCRWBEK4MZ163537, License Number 26288D3; and,
- c. A sum of money equal to the total amount of proceeds obtained as a result of the offense, or conspiracy to commit such offense, for which defendants are convicted.

2. Upon conviction of the offense alleged in Count Two of this Indictment, defendants HOLLY ADAMS and DEVLIN HOSNER shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), all property, real or personal, involved in such offense, and any property traceable to such property, including but not limited to the following:

- a. Approximately \$214,842.60 seized from JP Morgan Chase Bank Account Number 623081319;
- b. 2021 Chevrolet Silverado 1500 Custom Truck, VIN: 1GCRWBEK4MZ163537, License Number 26288D3; and
- c. A sum of money equal to the amount of money involved in the offense, for which defendants are convicted.

3. If any property subject to forfeiture, as a result of the offenses alleged in Counts One and Two of this Indictment, for which defendants are convicted:

- 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;

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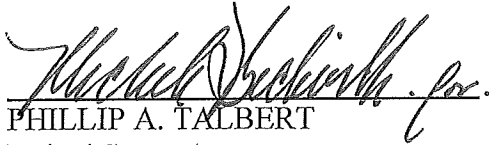
1 it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 18,
2 United States Code, Section 982(b)(1), to seek forfeiture of any other property of defendants, up to the
3 value of the property subject to forfeiture.

4 A TRUE BILL.

5 **/s/ Signature on file w/AUSA**

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FOREPERSON

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9 PHILLIP A. TALBERT
10 United States Attorney

No. _____

UNITED STATES DISTRICT COURT

Eastern District of California

Criminal Division

THE UNITED STATES OF AMERICA

vs.

**DEVLIN HOSNER
HOLLY ADAMS**

I N D I C T M E N T

VIOLATION(S): 21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to Distribute and Possess with Intent to Distribute Fentanyl and Methamphetamine; 18 U.S.C. §1956(h) – Conspiracy of Launder Money; and 21 U.S.C. § 853(a) – Criminal Forfeiture

A true bill,

Signature on file w/AUSA

Foreman.

Filed in open court this 12th day

of May, A.D. 2022

PBuzo

Clerk.

Bail, \$ _____
No further process necessary.



**DEBORAH BARNES
UNITED STATES MAGISTRATE JUDGE**

United States v. Devlin Hosner and Holly Adams
Penalties for Indictment

Defendants

DEVLIN HOSNER
HOLLY ADAMS

COUNT ONE: ALL DEFENDANTS

VIOLATION: 21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to Distribute and Possess with Intent to Distribute Fentanyl and Methamphetamine

PENALTIES: Mandatory minimum of ten (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 five (5) years and up to life.

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

COUNT TWO: ALL DEFENDANTS

VIOLATION: 18 U.S.C. § 1956(h) – Conspiracy to Launder Money

PENALTIES: Up to twenty (20) years in prison;
Fine of up to \$500,000 or twice the value of the monetary instrument or funds involved, whichever is greater; or both fine and imprisonment
Supervised release of up to three (3) years.

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

FORFEITURE ALLEGATION: ALL DEFENDANTS

VIOLATION: 21 U.S.C. § 853(a) and 18 U.S.C. § 982(a)(1) - Criminal Forfeiture

PENALTIES: As stated in the charging document