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ORDERED UNSEALED on 03/20/2025 s/ STN

FILED
Mar 18 2025
CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY s/ AI DEPUTY

~~SEALED~~

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

August 2024 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

RANDAL VANCE (1),
REBECCA VANCE (2),
KEIR CEBALLOS-RIVERA (3),

Defendant.

Case No. '25 CR0817 RSH

I N D I C T M E N T

Title 21, U.S.C., Sec. 841, 846, and 861(a)- Conspiracy to Use Minor to Manufacture, Distribute, and Possess with Intent to Distribute Psilocybin; Title 21, U.S.C., Sec. 841 and 846- Conspiracy to Distribute Psilocybin; Title 21, U.S.C., Sec. 859(a) - Distribution of Psilocybin to Person Under 21 Years of Age; Title 18, U.S.C., Sec. 924(c) - Possession of Firearms in Furtherance of Drug Trafficking Offense; Title 18, U.S.C., Sec. 1503(a) and 371 - Conspiracy to Obstruct Justice; Title 21, U.S.C., Sec. 853, Title 18, U.S.C. Sec. 924(d), and Title 28, U.S.C., Sec. 2461(c) - Criminal Forfeiture

The grand jury charges:

INTRODUCTORY ALLEGATIONS

At all times relevant:

1. Defendants RANDAL VANCE, REBECCA VANCE, KEIR CEBALLOS-RIVERA, and other conspirators resided in San Diego County.

1 2. Defendant RANDAL VANCE operated two websites and an Instagram
2 account to sell psilocybin over the Internet.

3 3. Defendants RANDAL VANCE and KEIR CEBALLOS-RIVERA grew
4 psilocybin mushrooms at a business in Fallbrook, California.

5 4. Defendants RANDAL VANCE and KEIR CEBALLOS-RIVERA used minors,
6 including MINOR-1, MINOR-2, and MINOR-3, to help cultivate and package
7 psilocybin.

8 5. MINOR-1—encouraged by defendant RANDAL VANCE who also warned
9 they would be “in big big trouble” (sic) if parents found out—distributed
10 psilocybin to other minors.

11 6. Defendant RANDAL VANCE, citing his experience “microdosing”
12 children, advocated that prospective customers “microdose” children with
13 psilocybin, including children as young as 9 years old.

14 7. Defendant RANDAL VANCE supplied defendant REBECCA VANCE with
15 psilocybin to distribute to others.

16 8. Defendant REBECCA VANCE suggested that defendant RANDAL VANCE
17 sell psilocybin in another form to enable customers to make their own
18 psilocybin-laced products.

19 Count 1

20 9. The allegations in paragraphs 1 through 8 are incorporated.

21 10. Beginning on a date unknown and continuing to on or about
22 October 4, 2024, within the Southern District of California and
23 elsewhere, defendants RANDAL VANCE and KEIR CEBALLOS-RIVERA, being at
24 least 18 years of age, did knowingly and intentionally conspire with
25 each other and with other persons known and unknown to the grand jury
26 to employ and use persons under 18 years of age to manufacture,
27 distribute, and possess with intent to distribute psilocybin, a Schedule
28

1 I controlled substance, in violation of Title 21, United States Code,
2 Sections 841, 846, and 861(a).

3 Count 2

4 11. The allegations in paragraphs 1 through 8 are incorporated.

5 12. Beginning on a date unknown and continuing to on or about
6 October 4, 2024, within the Southern District of California and
7 elsewhere, defendants RANDAL VANCE, REBECCA VANCE, and KEIR CEBALLOS-
8 RIVERA did knowingly and intentionally conspire with each other and with
9 other persons known and unknown to the grand jury to distribute
10 psilocybin, a Schedule I controlled substance, in violation of Title 21,
11 United States Code, Sections 841 and 846.

12 Count 3

13 13. On or about March 27, 2024, within the Southern District of
14 California, defendant RANDAL VANCE, who was then at least 18 years of
15 age, did knowingly distribute psilocybin, a Schedule I controlled
16 substance, to MINOR-1, who was then under 21 years of age, in violation
17 of Title 21, United States Code, Section 859(a).

18 Count 4

19 14. On or about March 27, 2024, within the Southern District of
20 California, defendant RANDAL VANCE, who was then at least 18 years of
21 age, did knowingly distribute psilocybin, a Schedule I controlled
22 substance, to MINOR-2, who was then under 21 years of age, in violation
23 of Title 21, United States Code, Section 859(a).

24 Count 5

25 15. On or about October 4, 2024, within the Southern District of
26 California, defendant RANDAL VANCE did knowingly possess a firearm, to
27 wit: a Glock 34 pistol, a Walther P22 pistol, a Henry Survival AR7 rifle,
28 a Smith and Wesson revolver, an H&R Model 900 revolver, and a Browning

1 30-06 rifle, in furtherance of a drug trafficking crime for which he may
2 be prosecuted in a court of the United States, to wit: the crimes alleged
3 in Counts 1-4 of this Indictment, in violation of Title 18, United States
4 Code, Section 924(c).

5 Count 6

6 16. The allegations in paragraphs 1 through 8 are incorporated.

7 17. Beginning on or about October 5, 2024, and continuing to at
8 least October 7, 2024, within the Southern District of California and
9 elsewhere, defendants RANDAL VANCE, REBECCA VANCE, and KEIR CEBALLOS-
10 RIVERA did knowingly and intentionally conspire with each other and with
11 other persons unknown to the grand jury, to commit an offense against
12 the United States, that is, to corruptly influence, impede, and obstruct
13 the due administration of justice in violation of Title 18, United States
14 Code, Sections 1503(a).

15 Overt Acts

16 To accomplish the object of this conspiracy, conspirators did the
17 following acts, among others, on or about the dates set forth below:

18 a. On October 5, 2024, RANDAL VANCE told REBECCA VANCE to
19 get messages to KEIR CEBALLOS-RIVERA and others that he needed the
20 "Spacespace stores" (the websites RANDAL VANCE used to sell psilocybin)
21 "gone" and "to individually erase each message."

22 b. On October 7, 2024, RANDAL VANCE asked KEIR CEBALLOS-
23 RIVERA to make sure another person "removes every single thing from
24 [S]ignal," a messaging application.

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

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1 FORFEITURE ALLEGATIONS

2 1. The allegations contained in Counts 1 through 5 of this
3 Indictment are realleged and by reference fully incorporated herein for
4 the purpose of alleging forfeiture to the United States of America
5 pursuant to the provisions of Title 21, United States Code, Section 853,
6 Title 18, United States Code, Section 924(d), and Title 28, United States
7 Cod, Section 2461(c).

8 2. Upon conviction of one and more of the felony offenses alleged
9 in Counts 1 through 4 this Indictment, said violations being punishable
10 by imprisonment for more than one year and pursuant to Title 21, United
11 States Code, Sections 853(a)(1) and 853(a)(2), defendants RANDAL VANCE,
12 REBECCA VANCE, and KEIR CEBALLOS-RIVERA, shall forfeit to the United
13 States all their rights, title and interest in any and all property
14 constituting, and derived from, any proceeds the defendants obtained,
15 directly and indirectly, as the result of the offenses, and any and all
16 property used and intended to be used in any manner and part to commit
17 and to facilitate the commission of the violations alleged in Counts 1
18 through 4 of this Indictment, including the firearms specified in
19 paragraph 15 of this Indictment.

20 3. Upon conviction of one and more of the offenses alleged in
21 Counts 1 through 5 of this Indictment, defendant RANDAL VANCE shall
22 forfeit to the United States, pursuant to Title 18, United States Code,
23 Section 924(d), and Title 28, United States Code, Section 2461(c), all
24 firearms and ammunition involved in the commission of the offenses,
25 including the firearms specified in paragraph 15 of this Indictment.

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

28 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 subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the property listed above as being subject to forfeiture.

All in violation of Title 21, United States Code, Section 853, Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

DATED: March 18, 2025.

ANDREW R. HADEN
Acting United States Attorney

By:


PAUL E. BENJAMIN
Assistant U.S. Attorney

