

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2025 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAGGU BHAGWANPURIA,
GURLAL SINGH,
 aka "Gurlal Rudiana,"
 aka "Gullu,"
SAHIBDEEP SINGH,
 aka "Anmol,"
GURDEV SINGH,
 aka "Jassal Chambal,"
AMRITPAL SINGH BAL,
 aka "Bal,"
GURINDERJIT SINGH,
 aka "Gurinderjit Singh Nagra,"
 aka "Gurinder Jeet Singh,"
 aka "Rajinder Singh,"
NITISH KAUSHAL,
 aka "Lala,"
GARINDER DEO,
 aka "Doctor,"
 aka "Rocket,"
 aka "Ritz Carlton,"
GURPREET SINGH,
 aka "Harman,"
HARSHPREET SINGH,
AMARBIR SINGH,
MANDEEP KAUR,
 aka "Cheema,"
LUIS ANGEL SALAS-PUEBLA,
MIGUEL ANGEL ORTIZ III,
 aka "Victor,"

CR 2:26-cr-00418-CV

I N D I C T M E N T

[18 U.S.C. § 1962(d): Racketeer Influenced and Corrupt Organizations Conspiracy; 18 U.S.C. § 1951(a): Attempted Interference with Commerce by Extortion; 21 U.S.C. § 846: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances; 21 U.S.C. § 841(a)(1), (b)(1)(A): Distribution of Controlled Substances; 18 U.S.C. § 371: Conspiracy to Engage in the Business of Dealing in Firearms Without a License; 18 U.S.C. § 922(o)(1): Possession of a Machinegun; 18 U.S.C. §§ 1963, 981(a)(1)(C), 924, 21 U.S.C. § 853, 28 U.S.C. § 2461(c): Criminal Forfeiture]

1 HARDEEP SINGH,
2 GURPREET SINGH, and
3 MAJOR SINGH,

4
5 Defendants.

6 The Grand Jury charges:

7 COUNT ONE

8 [18 U.S.C. § 1962(d)]

9 [DEFENDANTS BHAGWANPURIA, GURLAL SINGH, SAHIBDEEP SINGH, GURDEV
10 SINGH, BAL, KAUSHAL, HARSHPREET SINGH, AMARBIR SINGH, HARDEEP SINGH,
11 and MAJOR SINGH]

12 At times relevant to this Indictment:

13 A. THE RACKETEERING ENTERPRISE

14 1. Defendants JAGGU BHAGWANPURIA, GURLAL SINGH, also known as
15 ("aka") "Gurlal Rudiana," and "Gullu," SAHIBDEEP SINGH, aka "Anmol,"
16 GURDEV SINGH, aka "Jassal Chambal," AMRITPAL SINGH BAL, aka "Bal,"
17 NITISH KAUSHAL, aka "Lala," HARSHPREET SINGH, AMARBIR SINGH, HARDEEP
18 SINGH, and MAJOR SINGH, and others known and unknown to the Grand
19 Jury, were members and associates of a criminal organization engaged
20 in, among other things, acts involving extortion, kidnapping, and
21 trafficking in controlled substances. This organization, known as
22 the Jaggu Bhagwanpuria Organized Crime Group (the "Bhagwanpuria
23 OCG"), operated in the Central District of California and elsewhere.
24 The Bhagwanpuria OCG, including its leadership, members, and
25 associates, constituted an "enterprise," as that term is defined in
26 Title 18, United States Code, Section 1961(4), that is, a group of
27 individuals associated in fact, although not a legal entity, which
28 engaged in, and the activities of which affected, interstate and
foreign commerce. The Bhagwanpuria OCG constituted an ongoing

1 organization whose members functioned as a continuing unit for a
2 common purpose of achieving the objectives of the enterprise.

3 B. BACKGROUND OF THE BHAGWANPURIA OCG

4 2. The Bhagwanpuria OCG originated in the Punjab state of
5 India, under the leadership of its founder, defendant BHAGWANPURIA.
6 Defendant BHAGWANPURIA was a former associate of Lawrence Bishnoi, a
7 notorious Indian gangster and the founder of the Lawrence Bishnoi
8 Organized Crime Group ("Bishnoi OCG"). Over time, defendant
9 BHAGWANPURIA developed an independent network of criminal associates
10 that eventually came to rival the Bishnoi OCG.

11 3. The Bhagwanpuria OCG operated as a transnational criminal
12 syndicate headquartered in India with members across the United
13 States, Canada, the United Kingdom, Europe, Australia, and New
14 Zealand. The Bhagwanpuria OCG included over 1,000 members and
15 associates worldwide, including over 100 members and associates in
16 the United States. Members and associates of the Bhagwanpuria OCG
17 engaged in criminal activity including, but not limited to, murder,
18 kidnapping, drug trafficking, extortion, weapons trafficking, money
19 laundering, and human smuggling.

20 4. The Bhagwanpuria OCG engaged in violent criminal activity
21 in each country in which it operated, including the United States.
22 The Bhagwanpuria OCG accepted murder-for-hire contracts as a source
23 of revenue, and would also target perceived rivals with violence,
24 including murders and kidnapping. Perceived rivals of the
25 Bhagwanpuria OCG included members of rival organized crime groups,
26 members or associates of the Bhagwanpuria OCG believed to be
27 disloyal, and individuals believed to be cooperating with law
28 enforcement against the Bhagwanpuria OCG. Members and associates of

1 the Bhagwanpuria OCG would take credit for acts of violence against
2 rivals and law enforcement cooperators, including through social
3 media posts, to instill fear in the public and dissuade others from
4 resisting or otherwise challenging the enterprise.

5 5. The Bhagwanpuria OCG attempted to sow distrust in law
6 enforcement and other public institutions as a means of increasing
7 its power and its ability to generate revenue from criminal activity.
8 To do so, the Bhagwanpuria OCG corrupted law enforcement officers in
9 India and partnered with corrupt government officials, including to
10 assist in extortion schemes. The Bhagwanpuria OCG would also provide
11 false information to law enforcement officers in India regarding
12 alleged crimes. The Bhagwanpuria OCG used this false information to
13 target perceived rivals and individuals that members or associates of
14 the Bhagwanpuria OCG believed were cooperating with law enforcement.
15 Members and associates of the Bhagwanpuria OCG understood that
16 providing false information on perceived rivals to corrupt law
17 enforcement officers in India would often trigger baseless criminal
18 proceedings as well as extortion plots by corrupt Indian law
19 enforcement officers against perceived rivals.

20 6. The Bhagwanpuria OCG relied on drug trafficking as a
21 significant source of revenue for the enterprise. Defendant
22 BHAGWANPURIA personally managed a network of lucrative drug
23 trafficking routes in the United States through which members and
24 associates of the Bhagwanpuria OCG would transport cocaine,
25 methamphetamine, and other controlled substances across the United
26 States and into Canada. The Bhagwanpuria OCG used these drug
27 trafficking routes to transport controlled substances owned by
28

1 members and associates of the enterprise and to transport controlled
2 substances for other drug trafficking organizations.

3 7. Various U.S.-based sub-networks of the Bhagwanpuria OCG
4 coordinated drug shipments across the United States and to the U.S.-
5 Canada border on a weekly basis. In California, the Bhagwanpuria OCG
6 had multiple drug transportation sub-networks, each managed by a
7 different regional leader who reported to defendant BHAGWANPURIA.
8 These sub-networks could include dozens of different couriers, truck
9 drivers, and other members and associates. Each sub-network
10 typically collected drug loads in Southern California in passenger
11 vehicles, and then transferred the loads to long-haul semi-trucks for
12 long-distance transportation to the eastern United States or the
13 U.S.-Canada border. A standard transportation load typically
14 contained 100 kilograms or more of cocaine or methamphetamine.

15 8. Members and associates of the Bhagwanpuria OCG stole, or
16 "ripped," bulk quantities of cocaine from other drug trafficking
17 organizations, including by misappropriating loads of cocaine being
18 transported by the Bhagwanpuria OCG for other drug trafficking
19 organizations. Members and associates of the Bhagwanpuria OCG also
20 retaliated against individuals who stole controlled substances from
21 the enterprise with violence, including murders and kidnappings.

22 9. Members and associates of the Bhagwanpuria OCG engaged in
23 extortion in many of the countries in which the enterprise operated,
24 including the United States. Members and associates of the
25 Bhagwanpuria OCG obtained pattern-of-life information on extortion
26 targets and information about family members of extortion targets,
27 often focusing on family members located in India. Members and
28 associates of the Bhagwanpuria OCG contacted extortion targets

1 through encrypted applications, threatened victims with violence, and
2 demanded extortion payments.

3 10. In certain instances, members and associates of the
4 Bhagwanpuria OCG would use corrupt law enforcement officials in India
5 to aid in extortion schemes. In these extortion schemes, the corrupt
6 law enforcement official in India would file false criminal charges
7 against a victim or victims in India identified by the Bhagwanpuria
8 OCG. A member or associate of the Bhagwanpuria OCG, including in
9 some instances the corrupt law enforcement official in India, would
10 then contact the victim, or a close associate of the victim, to
11 inform him or her about the pending or soon-to-be pending criminal
12 case in India. The Bhagwanpuria member or associate would then
13 demand payment from the victim in exchange for the unfounded criminal
14 case to be dropped or dismissed in India.

15 11. Members and associates of the Bhagwanpuria OCG in the
16 United States also engaged in weapons trafficking. Through straw
17 purchasers in Nevada, U.S.-based members and associates of the
18 Bhagwanpuria OCG would acquire firearms, ammunition, and other
19 weapons. Members and associates of the Bhagwanpuria OCG would sell
20 those weapons in the United States or smuggle the weapons to Canada
21 to generate additional revenue for the enterprise.

22 12. Defendant BHAGWANPURIA oversaw and directed the global
23 activities of the Bhagwanpuria OCG from a jail cell in India, using
24 contraband cellphones and other voice over internet protocol devices.
25 Members and associates of the Bhagwanpuria OCG sent a percentage of
26 profits obtained from murder-for-hire contracts, extortions, and drug
27 trafficking activity back to defendant BHAGWANPURIA and other members
28 and associates in India.

1 13. The Bhagwanpuria OCG recruited new members primarily from
2 vulnerable, disadvantaged populations in India. The Bhagwanpuria OCG
3 targeted minors for recruitment to minimize the sentencing exposure
4 that would otherwise attach to violent criminal activity committed by
5 members and associates of the enterprise, and to minimize the
6 monetary cost of violence. In certain parts of India, the
7 Bhagwanpuria OCG paid as little as 20,000 rupees, or approximately
8 \$200, to members to commit murder on behalf of the enterprise.

9 14. Recruitment coordinators for the Bhagwanpuria OCG enticed
10 minors in India to join the enterprise by promising, among other
11 things, money, notoriety, power, and the ability to escape India.
12 Recruitment coordinators also attempted to identify potential new
13 recruits who had the ability to apply for student visas or foreign
14 work visas. The Bhagwanpuria OCG rewarded loyal members and
15 associates in India by sending them to operate in foreign countries,
16 including the United States and Canada.

17 15. Members and associates of the Bhagwanpuria OCG understood
18 that it was difficult, if not impossible, to leave the organization.
19 Bhagwanpuria OCG members and associates understood that, if they were
20 disloyal to the enterprise, other Bhagwanpuria OCG members or
21 associates would kill or otherwise harm them or their family members,
22 particularly those located in India. Bhagwanpuria OCG members and
23 associates threatened to kill or harm, and did kill and harm, other
24 members and associates, and family members of those members and
25 associates, believed to be cooperating with law enforcement or
26 otherwise perceived to be disloyal.

27

28

1 C. PURPOSES OF THE ENTERPRISE

2 16. The purposes of the Bhagwanpuria OCG included, but were not
3 limited to, the following:

4 a. Enriching the members and associates of the
5 Bhagwanpuria OCG through, among other crimes, murder-for-hire
6 contracts, the distribution of controlled substances, the trafficking
7 of firearms, and the collection of extortion payments;

8 b. Promoting and enhancing the reputation and activities
9 of the Bhagwanpuria OCG and its members and associates;

10 c. Preserving, protecting, and expanding the power of the
11 Bhagwanpuria OCG through the use of threats, intimidation, and acts
12 of violence, including, without limitation, murder, kidnapping, and
13 assault; and

14 d. Maintaining control and authority over territories and
15 communities controlled by the Bhagwanpuria OCG, often through acts of
16 violence, extortions, threats, and intimidation.

17 D. MEANS AND METHODS OF THE ENTERPRISE

18 17. The means and methods by which defendants BHAGWANPURIA,
19 GURLAL SINGH, SAHIBDEEP SINGH, GURDEV SINGH, BAL, KAUSHAL, HARSHPREET
20 SINGH, AMARBIR SINGH, HARDEEP SINGH, and MAJOR SINGH, and other
21 members and associates of the Bhagwanpuria OCG, conducted and
22 participated in the conduct of the affairs of the Bhagwanpuria OCG
23 included the following:

24 a. Members and associates of the Bhagwanpuria OCG
25 committed, attempted to commit, conspired to commit, and threatened
26 to commit acts of violence, including, without limitation, murder,
27 kidnappings, assaults, and extortion to create a climate of fear,

1 promote and enhance the Bhagwanpuria OCG's reputation for violence,
2 and expand the Bhagwanpuria OCG's criminal operations;

3 b. Members and associates of the Bhagwanpuria OCG
4 trafficked and stole controlled substances to generate income for the
5 Bhagwanpuria OCG;

6 c. Members and associates of the Bhagwanpuria OCG
7 corrupted law enforcement officials in India, and enlisted corrupt
8 law enforcement officials in India, to assist with criminal schemes,
9 sow distrust for established institutions, minimize faith in law and
10 order, and facilitate extortion schemes and other criminal activity;

11 d. Members and associates of the Bhagwanpuria OCG claimed
12 responsibility for acts of violence and other criminal activity to
13 create a climate of fear, promote and enhance the Bhagwanpuria OCG's
14 reputation for violence, and maximize the likelihood of victim
15 compliance with extortion demands made by members and associates;

16 e. Members and associates of the Bhagwanpuria OCG
17 extorted and attempted to extort victims to generate revenue for the
18 enterprise; and

19 f. Members and associates of the Bhagwanpuria OCG
20 violently retaliated against rival gang members, individuals believed
21 to be cooperating with law enforcement or otherwise disloyal, and
22 others who challenged the Bhagwanpuria OCG's authority or values to
23 maintain a climate of fear, promote and enhance the Bhagwanpuria
24 OCG's reputation for violence, and protect the Bhagwanpuria OCG's
25 criminal operations.

26 E. OBJECT OF THE RACKETEERING CONSPIRACY

27 18. Beginning on a date unknown to the Grand Jury, and
28 continuing to on or about June 25, 2026, in Los Angeles and San

1 Bernardino Counties, within the Central District of California, and
2 elsewhere, defendants BHAGWANPURIA, GURLAL SINGH, SAHIBDEEP SINGH,
3 GURDEV SINGH, BAL, KAUSHAL, HARSHPREET SINGH, AMARBIR SINGH, HARDEEP
4 SINGH, and MAJOR SINGH, and others known and unknown to the Grand
5 Jury, each being a person employed by and associated with the
6 Bhagwanpuria OCG, an enterprise engaged in, and the activities of
7 which affected interstate and foreign commerce, knowingly and
8 intentionally conspired to violate Title 18, United States Code,
9 Section 1962(c), that is, to conduct and participate, directly and
10 indirectly, in the conduct of the affairs of the Bhagwanpuria OCG
11 through a pattern of racketeering activity, as that term is defined
12 in Title 18, United States Code, Section 1961(1) and (5), consisting
13 of:

14 a. multiple acts involving:

15 i. Extortion, chargeable under California Penal Code
16 Sections 21a, 31, 182, 518, 519, 520, and 664; and

17 ii. Kidnapping, chargeable under California Penal
18 Code Sections 207(a), 664, 182, 21a, and 31.

19 b. multiple acts indictable under Title 18, United States
20 Code, Section 1951(a) (relating to interference with commerce by
21 robbery and extortion); and

22 c. multiple offenses involving trafficking of controlled
23 substances in violation of Title 21, United States Code, Sections
24 841(a)(1) and 846.

25 19. It was a further part of the conspiracy that each defendant
26 agreed that a conspirator would commit at least two acts of
27 racketeering in the conduct of the affairs of the enterprise.
28

1 F. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE
2 ACCOMPLISHED

3 20. The object of the conspiracy was to be accomplished, in
4 substance, as follows:

5 a. Defendant BHAGWANPURIA, the global leader of the
6 Bhagwanpuria OCG, would direct and coordinate acts of violence
7 committed by Bhagwanpuria OCG members and associates in the United
8 States, Canada, and elsewhere, including, but not limited to,
9 kidnappings, assaults, and extortion schemes.

10 b. Defendants GURLAL SINGH, SAHIBDEEP SINGH, GURDEV
11 SINGH, AMRITPAL SINGH, KAUSHAL, HARSHPREET SINGH, and AMARBIR SINGH,
12 and others known and unknown to the Grand Jury, would carry out acts
13 of violence on behalf of the Bhagwanpuria OCG, including, but not
14 limited to, kidnappings and assaults.

15 c. Defendants GURLAL SINGH, GURDEV SINGH, and GURINDERJIT
16 SINGH, and others known and unknown to the Grand Jury, would carry
17 out extortions on behalf of the Bhagwanpuria OCG.

18 d. Defendant GURLAL SINGH, and others unknown to the
19 Grand Jury, would corrupt Indian law enforcement officers and provide
20 false information on perceived rivals of the Bhagwanpuria OCG to
21 corrupt Indian law enforcement officers.

22 e. Defendant GURLAL SINGH, and others unknown to the
23 Grand Jury, would cause false criminal charges to issue against
24 perceived rivals of the Bhagwanpuria OCG.

25 f. Defendants GURLAL SINGH, SAHIBDEEP SINGH, and GURDEV
26 SINGH, and others unknown to the Grand Jury, would create social
27 media posts taking credit for acts of violence, including murder, to
28

1 enhance the Bhagwanpuria OCG's reputation for extreme violence and
2 encourage victim compliance with extortion schemes.

3 g. Defendant BHAGWANPURIA would oversee and manage
4 transportation routes for bulk quantities of cocaine and
5 methamphetamine being trafficked across the United States and to the
6 U.S.-Canada border.

7 h. Defendant BAL, and others unknown to the Grand Jury,
8 would manage networks of long-haul semi-truck drivers and local
9 couriers transporting bulk quantities of cocaine and methamphetamine
10 along transportation routes controlled by the Bhagwanpuria OCG.

11 i. Defendant BAL and others known and unknown to the
12 Grand Jury would direct the activities of Bhagwanpuria OCG members
13 and associates receiving, storing, transporting, and/or delivering
14 bulk quantities of cocaine and methamphetamine along transportation
15 routes controlled by the Bhagwanpuria OCG.

16 j. Defendants SAHIBDEEP SINGH and HARDEEP SINGH, and
17 others known and unknown to the Grand Jury, would collect, transport,
18 and/or deliver bulk quantities of cocaine and methamphetamine.

19 k. Defendant BAL would sell bulk quantities of cocaine to
20 generate revenue for the Bhagwanpuria OCG.

21 l. Defendants GURLAL SINGH, SAHIBDEEP SINGH, and MAJOR
22 SINGH would sell firearms to generate revenue for the Bhagwanpuria
23 OCG.

24 G. OVERT ACTS

25 21. In furtherance of the conspiracy and to accomplish its
26 objects, on or about the following dates, defendants BHAGWANPURIA,
27 GURLAL SINGH, SAHIBDEEP SINGH, GURDEV SINGH, BAL, KAUSHAL, HARSHPREET
28 SINGH, AMARBIR SINGH, HARDEEP SINGH, and MAJOR SINGH, and others

1 known and unknown to the Grand Jury, committed and caused to be
2 committed various overt acts within the Central District of
3 California, and elsewhere, including, but not limited to, the
4 following:

5 DEFENDANT BAL DISTRIBUTES FIVE KILOGRAMS OF COCAINE
6 REPRESENTED TO BE STOLEN

7 Overt Act No. 1: On June 17, 2024, Co-Conspirator 1
8 negotiated the sale of five kilograms of cocaine that Co-Conspirator
9 1 represented had been stolen by defendant BAL to an individual who
10 Co-Conspirator 1 and other members and associates of the Bhagwanpuria
11 OCG believed was a criminal associate, but who in fact was a
12 confidential informant working with law enforcement ("CI-1").

13 Overt Act No. 2: On June 26, 2024, Gurpreet Singh, at the
14 direction of defendant BAL, sold approximately 5.02 kilograms of a
15 mixture and substance containing a detectable amount of cocaine to
16 CI-1 for \$45,000.

17 Overt Act No. 3: On June 26, 2024, Gurpreet Singh collected
18 and transported \$45,000 in drug proceeds.

19 DEFENDANTS BAL, KAUSHAL, HARSHPREET SINGH, AND AMARBIR SINGH
20 KIDNAP VICTIM 1 AS RETRIBUTION FOR A STOLEN DRUG LOAD

21 Overt Act No. 4: On July 10, 2024, Co-Conspirator 1, an
22 associate of the Bhagwanpuria OCG, used a cellphone to communicate
23 with an individual believed to have stolen a drug load from defendant
24 BAL and the Bhagwanpuria OCG in an effort to lure that individual to
25 a residence in Manteca, California.

26 Overt Act No. 5: On July 10, 2024, defendants BAL, KAUSHAL,
27 HARSHPREET SINGH, and AMARBIR SINGH restrained Victim 1 at defendant
28 BAL's direction at a residence in Manteca, California.

1 Overt Act No. 6: On July 10, 2024, defendants KAUSHAL and
2 HARSHPREET SINGH, and others unknown to the Grand Jury, assaulted
3 Victim 1.

4 Overt Act No. 7: On July 10, 2024, defendants BAL, KAUSHAL,
5 and AMARBIR SINGH, and others known and unknown to the Grand Jury,
6 transported Victim 1 from Manteca, California to an apartment in
7 Fresno, California, as depicted in the image below:



19 Overt Act No. 8: On July 10, 2024, defendant BAL, and others
20 unknown to the Grand Jury, demanded that Victim 1 pay \$50,000 for a
21 Bhagwanpuria OCG drug load that defendant BAL claimed had been stolen
22 from him.

23 Overt Act No. 9: On July 10, 2024, defendant BHAGWANPURIA
24 directed defendant BAL, and others unknown to the Grand Jury, to
25 release Victim 1 in an effort to resolve an internal dispute within
26 the Bhagwanpuria OCG.

27 //

28 //

1 DEFENDANTS SAHIBDEEP SINGH AND HARDEEP SINGH ASSIST WITH TRANSPORTING
2 BULK COCAINE AND HEROIN ACROSS THE UNITED STATES

3 Overt Act No. 10: On May 22, 2025, Mandeep Kaur agreed to
4 transport approximately 80 to 100 kilograms of cocaine from Los
5 Angeles, California to Indianapolis, Indiana at a price of \$500 per
6 kilogram.

7 Overt Act No. 11: On June 1, 2025, Gurpreet "Harman" Singh
8 agreed to assist in coordinating the storage and transportation of
9 approximately 100 kilograms of cocaine in the Los Angeles area.

10 Overt Act No. 12: On June 1, 2025, Gurpreet "Harman" Singh
11 enlisted defendant SAHIBDEEP SINGH to receive, store, and transport
12 approximately 100 kilograms of cocaine in the Los Angeles area.

13 Overt Act No. 13: On June 1, 2025, defendant SAHIBDEEP SINGH
14 received approximately 99.2 kilograms of a mixture and substance
15 containing a detectable amount of cocaine, and approximately one
16 kilogram of heroin, in a parking lot in Pomona, California from a
17 different drug trafficking organization.

18 Overt Act No. 14: On June 3, 2025, defendants SAHIBDEEP SINGH
19 and HARDEEP SINGH delivered approximately 99.2 kilograms of a mixture
20 and substance containing a detectable amount of cocaine, and
21 approximately one kilogram of heroin, to Mandeep Kaur in Barstow,
22 California.

23 Overt Act No. 15: Between June 3, 2025 and June 5, 2025,
24 Mandeep Kaur transported approximately 99.2 kilograms of a mixture
25 and substance containing a detectable amount of cocaine, and
26 approximately one kilogram of heroin, in a long-haul semi-truck from
27 Barstow, California to Greenfield, Indiana.

28

1 Overt Act No. 16: On June 4, 2025, Gurpreet "Harman" Singh
2 agreed to assist in coordinating the transportation of approximately
3 100 kilograms of cocaine from Indianapolis to New Jersey.

4 Overt Act No. 17: On June 4, 2026, Gurpreet "Harman" Singh
5 enlisted Co-Conspirator 2 to transport approximately 100 kilograms of
6 cocaine from Indianapolis to New Jersey.

7 Overt Act No. 18: On June 5, 2025, Mandeep Kaur delivered
8 approximately 99.2 kilograms of a mixture and substance containing a
9 detectable amount of cocaine, and approximately one kilogram of
10 heroin, to Co-Conspirator 2 in Greenfield, Indiana.

11 Overt Act No. 19: On June 7, 2025, Co-Conspirator 2 delivered
12 approximately 99.2 kilograms of a mixture and substance containing a
13 detectable amount of cocaine, and approximately one kilogram of
14 heroin, to a member or associate of a different drug trafficking
15 organization, which cocaine was subsequently seized and is depicted
16 in the image below:



17
18
19
20
21
22
23
24
25
26
27 Overt Act No. 20: On June 7, 2025, Co-Conspirator 2 accepted
28 \$15,000 in payment for himself, defendant SAHIBDEEP SINGH, and

1 Gurpreet "Harman" Singh for their respective roles in transporting
2 the cocaine and heroin load across the country.

3 DEFENDANTS GURLAL SINGH, SAHIBDEEP SINGH, AND MAJOR SINGH SELL SEMI-
4 AUTOMATIC RIFLES, A MACHINE GUN, AND PISTOLS

5 Overt Act No. 21: On July 11, 2025, defendant SAHIBDEEP SINGH
6 offered to sell CI-1 weapons, including AK-47s and grenades.

7 Overt Act No. 22: On September 4, 2025, in a parking lot in
8 Fontana, California, defendants GURLAL SINGH and SAHIBDEEP SINGH sold
9 CI-1 (i) a CANiK, model TP9SA, 9mm Luger caliber pistol, bearing
10 serial number 21AP 20710, (ii) a Polymer80, model PF940V2, 9mm Luger
11 caliber pistol, bearing no serial number (commonly referred to as a
12 "ghost gun"), (iii) one machine gun conversion device, (iv) two
13 pistol magazines, and (v) 16 rounds of Winchester 9mm ball ammunition
14 for a total price of \$2,000.

15 Overt Act No. 23: On September 18, 2025, in a parking lot in
16 Santa Clarita, California, defendants GURLAL SINGH and SAHIBDEEP
17 SINGH sold CI-1 (i) a Noveske Rifleworks, model N4, 6.8mm Remington
18 SPC caliber semi-automatic rifle, bearing serial number C-1452, (ii)
19 a Palmetto State Armory, model PA-10, .308 Winchester caliber semi-
20 automatic rifle, bearing serial number PF 061513, (iii) five rounds
21 of Winchester .308 caliber ammunition, (iv) 11 rounds of Remington
22 6.6 caliber ammunition, (v) one round of Federal Cartridge Company
23 6.8 caliber ammunition, (vi) three rounds of Red Army 7.62x39 caliber
24 ammunition, (vii) five rounds of Tulammo 7.62x39 caliber ammunition,

25 //

26 //

27 //

28

1 (viii) two rounds of Hornaday 6.8 caliber ammunition, and (ix) a
2 tactical gun case containing assorted gun parts and magazines, as
3 pictured below, for a total price of \$4,000.



4
5
6
7
8
9
10
11
12
13
14
15
16
17 Overt Act No. 24: On October 7, 2025, in a parking lot in
18 Bakersfield, California, defendants GURLAL SINGH and MAJOR SINGH sold
19 CI-1 a privately manufactured, unknown model, 5.56x45mm caliber

20 //

21 //

22 //

23

24

25

26

27

28

1 short-barreled semi-automatic ghost gun rifle, and 30 rounds of LC
2 .223 caliber ammunition, as pictured below, for a total price of
3 \$1,000.



4
5
6
7
8
9
10
11
12
13
14 Overt Act No. 25: On December 3, 2025, in a parking lot in
15 Stevenson Ranch, California, defendants GURLAL SINGH and SAHIBDEEP
16 SINGH sold CI-1 a privately manufactured, unknown model, 5.56x45mm
17 caliber short-barreled semi-automatic ghost gun rifle; a Glock, model
18 19X, 9mm Luger caliber pistol, bearing serial number BXY285; a Sig
19 Sauer, model P250, 9mm S&W caliber pistol, bearing serial number

20 //

21 //

22 //

23

24

25

26

27

28

1 57C002841; and a Taurus, model G3, 9mm Luger caliber pistol, with an
2 obliterated serial number, as pictured below, for a total price of
3 \$10,000.



4
5
6
7
8
9
10
11
12
13
14 DEFENDANTS BHAGWANPURIA AND SAHIBDEEP SINGH AGREE TO TRANSPORT, AND
15 SUBSEQUENTLY COORDINATE THE TRANSPORTATION OF, A LOAD OF SHAM COCAINE

16 Overt Act No. 26: On February 16, 2026, defendant BHAGWANPURIA
17 agreed to coordinate the collection of approximately 20 kilograms of
18 cocaine from CI-1 and the placement of that cocaine aboard a vehicle
19 transporting approximately 163 kilograms of cocaine from Los Angeles
20 to Vancouver, Canada for a price of \$1,600 per kilogram.

21 Overt Act No. 27: On February 16, 2026, defendant BHAGWANPURIA
22 sent CI-1 the telephone number of a drug coordinator and a serial
23 number of a bill of currency so that CI-1 could coordinate the
24 delivery of 20 kilograms of cocaine to a member or associate of the
25 Bhagwanpuria OCG for transportation from Los Angeles to Vancouver.

26 Overt Act No. 28: On February 18, 2026, Co-Conspirator 3
27 accepted, on behalf of the Bhagwanpuria OCG, what defendant
28 BHAGWANPURIA and other members and associates of the Bhagwanpuria OCG

1 believed was approximately 20 kilograms of a mixture and substance
2 containing a detectable amount of cocaine, but which in fact was a
3 sham load of cocaine (the "sham cocaine load").

4 Overt Act No. 29: On February 20, 2026, defendant SAHIBDEEP
5 SINGH communicated to CI-1, in Punjabi, "boss told me that load will
6 reach day after tomorrow."

7 Overt Act No. 30: On February 21, 2026, Co-Conspirator 4 and
8 Co-Conspirator 5 transported the sham cocaine load north on Highway
9 99 in San Joaquin County, California on behalf of the Bhagwanpuria
10 OCG.

11 Overt Act No. 31: On February 23, 2026, after law enforcement
12 seized the sham cocaine load, defendant BHAGWANPURIA provided an
13 update to CI-1, in Punjabi, that the "whole load got caught," and
14 accused CI-1 that a "tracker was in your bricks sisterfucker you
15 fucked up everything."

16 DEFENDANTS GURLAL SINGH AND GURDEV SINGH CLAIM RESPONSIBILITY

17 FOR THE MURDER OF B.S. IN INDIA ON INSTAGRAM

18 Overt Act No. 32: On January 15, 2026, defendants GURLAL
19 SINGH, SAHIBDEEP SINGH, and GURDEV SINGH planned, on a phone call, an
20 Instagram post that would claim responsibility for the January 15,
21 2026 murder of victim B.S. in Miani, India.

22 DEFENDANT GURLAL SINGH SENDS VICTIM 2 A SCREENSHOT OF THE INSTAGRAM

23 POST CLAIMING RESPONSIBILITY FOR THE MURDER OF B.S.

24 Overt Act No. 33: On January 16, 2026, defendant GURLAL SINGH
25 sent Victim 1, who had a familial connection to B.S., a screenshot of
26 the Instagram post planned by defendants GURLAL SINGH, SAHIBDEEP
27 SINGH, and GURDEV SINGH on January 15, 2026, in which "Jashal
28 Chambal," an alias of defendant GURDEV SINGH, claimed responsibility

1 on behalf of himself and "Gurlal Rudiana," an alias of defendant
2 GURLAL SINGH, for the murder of victim B.S., as depicted in the image
3 and translation below:



14 DEFENDANT GURLAL SINGH INDUCES A CORRUPT INDIAN OFFICIAL TO FALSELY
15 ACCUSE VICTIM 2, VICTIM 2's FATHER, AND VICTIM 2's SISTER OF
16 CONSPIRING TO MURDER B.S., AND SUBSEQUENTLY EXTORT THE VICTIMS

17 Overt Act No. 34: No later than April 13, 2026, defendant
18 GURLAL SINGH provided Victim 2's name and information to Gurinderjit
19 Singh, a corrupt law enforcement officer in the Punjab state of
20 India, for purposes of falsely accusing Victim 2 of murder.

21 Overt Act No. 35: On April 13, 2026, Gurinderjit Singh
22 contacted Victim 2's father, Victim 3, and told Victim 3 that, after
23 conferring with defendant GURLAL SINGH, Gurinderjit Singh would be
24 criminally charging Victim 3 for the murder of B.S.

25 Overt Act No. 36: On April 16, 2026, Gurinderjit Singh
26 communicated to Victim 2 that, unless Victim 2 or Victim 3 paid
27 Gurinderjit Singh, Victim 2, Victim 3, and Victim 2's sister, Victim
28 4, would be "in the case" for the murder of B.S.

1 Overt Act No. 37: On May 24, 2026, Gurinderjit Singh
2 participated in a press conference in Punjab, India at which Indian
3 law enforcement accused Victim 2 and Victim 3, in Punjabi, of giving
4 "a contract to have [B.S.] murdered," and stated that Victim 2,
5 Victim 3, and Victim 4 would be "formally nominated" as "accused" in
6 the murder of B.S.

7 Overt Act No. 38: On May 25, 2026, following the press
8 conference, Gurinderjit Singh communicated to Victim 3, in Punjabi,
9 that "Gurlal" is "with me," and that defendant GURLAL SINGH told
10 Gurinderjit Singh that "they didn't pay us the whole amount what was
11 agreed upon."

12 Overt Act No. 39: On May 25, 2026, Gurinderjit Singh
13 communicated to Victim 3 Gurinderjit Singh would remove two of the
14 three individuals falsely implicated in the murder of B.S. (i.e.,
15 Victim 2, Victim 3, and/or Victim 4) upon receipt of a payment.

16 DEFENDANT GURDEV SINGH ATTEMPTS TO EXTORT A BUSINESS OWNER IN OHIO

17 Overt Act No. 40: On May 24, 2026, defendant GURDEV SINGH,
18 while in the custody of U.S. Immigration and Customs Enforcement,
19 contacted Victim 5, a business owner in Ohio, and, in a voice message
20 in Punjabi, stated that his "group needs money," specifically "15
21 lakhs rupees," and that they were willing to "take [the money] by
22 brutal force."

23 Overt Act No. 41: On May 28, 2026, defendant GURDEV SINGH,
24 while in the custody of U.S. Immigration and Customs Enforcement,
25 contacted Victim 5 and, in a voice message in Punjabi, stated the
26 following: "I will tell you this much now, I gave you today's time,
27 you don't listen to me. Now, you listen to me with your ears wide
28 open. I will kill you by making you run on the road, right. I'm going

1 to put the bullets in your kids too, alright. Save your family,
2 alright. Now, listen to me, my group had asked for money and now many
3 groups are going to ask. I will tell everyone to fuck you. Now my
4 brother, stay strong, alright. Money, now we will extort it from you,
5 it's not 15 lakhs now, it's 50 lakhs, alright. We negotiated 15 lakhs
6 with you and now we will extort 50 lakhs from you."

7 Overt Act No. 42: On June 11, 2026, defendant GURDEV SINGH or
8 a co-conspirator sent Victim 5 a WhatsApp message containing a
9 photograph of Victim 5's residence.

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT TWO

[18 U.S.C. § 1951(a)]

[DEFENDANT GURINDERJEET SINGH]

22. Between on or about April 13, 2026 and June 5, 2026, in Los Angeles County, within the Central District of California, and elsewhere, defendant GURINDERJIT SINGH, also known as "Gurinderjit Singh Nagra," "Gurinder Jeet Singh," and "Rajinder Singh," knowingly and with the intent to obtain property, attempted to obstruct, delay, and affect foreign commerce and the movement of articles in commerce by extortion, in that defendant GURINDERJEET SINGH attempted to obtain property, consisting of money from Victim 2 and Victim 3, with Victim 2's and 3's consent induced by the wrongful use of threatened force, violence, and fear.

1 a. Defendant DEO would purchase bulk quantities of
2 cocaine, heroin, and other controlled substances from Mexico-based
3 sources of supply for distribution to clients in Canada and the
4 eastern United States.

5 b. Defendant DEO would contract with other drug
6 trafficking organizations to transport bulk quantities of cocaine,
7 heroin, and other controlled substances from the Central District of
8 California to the U.S.-Canada border and the eastern United States.

9 c. Defendant SALAS-PUEBLA would deliver bulk quantities
10 of cocaine and heroin on behalf of Mexico-based drug trafficking
11 organizations supplying bulk quantities of controlled substances to
12 other drug trafficking organizations, including defendant DEO's drug
13 trafficking organization.

14 d. Defendant GURPREET "HARMAN" SINGH would coordinate
15 logistics for receiving, storing, transporting, and delivering bulk
16 quantities of cocaine and heroin.

17 e. Defendants SAHIBDEEP SINGH and HARDEEP SINGH would
18 collect, store, transport, and deliver bulk quantities of cocaine and
19 heroin.

20 f. Defendant KAUR would transport bulk quantities of
21 cocaine and heroin across the United States in a long-haul semi-
22 truck.

23 g. Defendant ORTIZ would receive bulk quantities of
24 cocaine and heroin in the eastern United States on behalf of a drug
25 trafficking organization purchasing controlled substances from
26 defendant DEO.

27

28

1 J. OVERT ACTS

2 25. In furtherance of the conspiracy and to accomplish its
3 objects, on or about the following dates, defendants SAHIBDEEP SINGH,
4 DEO, GURPREET "HARMAN" SINGH, KAUR, SALAS-PUEBLA, ORTIZ, and HARDEEP
5 SINGH, and others known and unknown to the Grand Jury, committed
6 various overt acts within the Central District of California and
7 elsewhere, including, but not limited to, the following:

8 Overt Act No. 1: No later than January 20, 2025, defendant
9 DEO provided his contact information to a person defendant DEO and
10 other co-conspirators believed was a criminal associate but who was,
11 in fact, a confidential informant working with law enforcement ("CI-
12 1") for purposes of assisting with the purchase and transportation of
13 bulk quantities of controlled substances in the Los Angeles area.

14 Overt Act No. 2: On May 29, 2025, defendant DEO contacted CI-
15 1 and requested assistance with transporting a bulk quantity of
16 cocaine from the Los Angeles area to the eastern United States.

17 Overt Act No. 3: On June 1, 2025, defendant DEO provided a
18 telephone number and serial number for a dollar bill received by
19 defendant DEO from CI-1 to a representative for the drug trafficking
20 organization supplying defendant DEO with bulk quantities of cocaine
21 for purposes of collecting and transporting that cocaine.

22 Overt Act No. 4: On May 22, 2025, defendant KAUR agreed to
23 transport approximately 80 to 100 kilograms of cocaine from Los
24 Angeles, California to Indianapolis, Indiana at a price of \$500 per
25 kilogram.

26 Overt Act No. 5: On June 1, 2025, defendant GURPREET "HARMAN"
27 SINGH agreed to assist in coordinating the storage and transportation
28

1 of approximately 100 kilograms of cocaine in the greater Los Angeles
2 area.

3 Overt Act No. 6: On June 1, 2025, defendant GURPREET "HARMAN"
4 SINGH enlisted defendant SAHIBDEEP SINGH to receive, store, and
5 transport approximately 100 kilograms of cocaine in the greater Los
6 Angeles area.

7 Overt Act No. 7: On June 1, 2025, defendant SALAS-PUEBLAS
8 delivered to defendant SAHIBDEEP SINGH approximately 99.2 kilograms
9 of a mixture and substance containing a detectable amount of cocaine,
10 and approximately one kilogram of heroin, in a parking lot in Pomona,
11 California.

12 Overt Act No. 8: On June 3, 2025, defendants SAHIBDEEP SINGH
13 and HARDEEP SINGH delivered approximately 99.2 kilograms of a mixture
14 and substance containing a detectable amount of cocaine, and
15 approximately one kilogram of heroin, to defendant KAUR in Barstow,
16 California.

17 Overt Act No. 9: Between June 3, 2025 and June 5, 2025,
18 defendant KAUR transported approximately 99.2 kilograms of a mixture
19 and substance containing a detectable amount of cocaine, and
20 approximately one kilogram of heroin, in a long-haul semi-truck from
21 Barstow, California to Greenfield, Indiana.

22 Overt Act No. 10: On June 4, 2025, defendant GURPREET "HARMAN"
23 SINGH agreed to assist in coordinating the transportation of
24 approximately 100 kilograms of cocaine from Indianapolis to New
25 Jersey.

26 Overt Act No. 11: On June 4, 2026, defendant GURPREET "HARMAN"
27 SINGH enlisted Co-Conspirator 2 to transport approximately 100
28 kilograms of cocaine from Indianapolis to New Jersey.

1 Overt Act No. 12: On June 5, 2025, defendant KAUR delivered
2 approximately 99.2 kilograms of a mixture and substance containing a
3 detectable amount of cocaine, and approximately one kilogram of
4 heroin, to Co-Conspirator 2 in Greenfield, Indiana.

5 Overt Act No. 13: On June 6, 2025, defendant DEO instructed
6 CI-1 that, moving forward, he wanted to "keep it busy" and work with
7 an organization that was moving or otherwise supplying "200"
8 kilograms of cocaine "a week."

9 Overt Act No. 14: On June 7, 2025, defendant ORTIZ received
10 approximately 99.2 kilograms of a mixture and substance containing a
11 detectable amount of cocaine, and approximately one kilogram of
12 heroin, from Co-Conspirator 2 in a parking lot in Clinton, New
13 Jersey.

14 Overt Act No. 15: On June 7, 2025, Co-Conspirator 2 accepted
15 \$15,000 in payment for himself and defendants GURPREET "HARMAN" SINGH
16 and SAHIBDEEP SINGH for their respective roles in transporting the
17 cocaine and heroin load across the country.

18 Overt Act No. 16: On June 7, 2025, shortly after law
19 enforcement seized the approximately 99.2 kilograms of a mixture and
20 substance containing a detectable amount of cocaine and approximately
21 one kilogram of heroin, defendant DEO messaged CI-1 "bro what happen
22 they saying the guys got pinched."

23 Overt Act No. 17: On June 7, 2025, shortly after law
24 enforcement seized the approximately 99.2 kilograms of a mixture and
25 substance containing a detectable amount of cocaine and approximately
26 one kilogram of heroin, defendant DEO sent CI-1 a screenshot of a
27 message defendant DEO received stating "the work and Victor at the
28 police station bro," and then messaged CI-1 "shit bro not good."

1 e. Defendant GURPREET SINGH would collect and transport
2 drug proceeds derived from the sale of cocaine.

3 C. OVERT ACTS

4 28. In furtherance of the conspiracy and to accomplish its
5 object, on or about the following dates, defendants BAL and GURPREET
6 SINGH, and others known and unknown to the Grand Jury, committed
7 various overt acts within the Central District of California and
8 elsewhere, including, but not limited to, the following:

9 Overt Act No. 1: On June 17, 2024, Co-Conspirator 1
10 negotiated the sale of five kilograms of cocaine that Co-Conspirator
11 1 represented had been stolen by defendant BAL to an individual who
12 Co-Conspirator 1, defendants BAL and GURPREET SINGH, and other co-
13 conspirators believed was a criminal associate, but who in fact was a
14 confidential informant working with law enforcement ("CI-1").

15 Overt Act No. 2: On June 26, 2024, defendant GURPREET SINGH,
16 at the direction of defendant BAL, sold approximately 5.02 kilograms
17 of a mixture and substance containing a detectable amount of cocaine
18 to CI-1 for \$45,000.

19 Overt Act No. 3: On June 26, 2024, defendant GURPREET SINGH
20 collected and transported \$45,000 in drug proceeds.

21
22
23
24
25
26
27
28

COUNT FIVE

[21 U.S.C. § 841(a)(1), (b)(1)(A)(ii)(II)]

[DEFENDANT GURPREET SINGH]

29. On or about June 26, 2024, in Los Angeles County, within the Central District of California, defendant GURPREET SINGH knowingly and intentionally distributed at least five kilograms, that is, approximately 5.02 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 c. Defendants GURLAL SINGH, SAHIBDEEP SINGH, and MAJOR
2 SINGH would transport firearms for purposes of sale.

3 d. Defendants GURLAL SINGH, SAHIBDEEP SINGH, and MAJOR
4 SINGH would meet in parking lots and other public places and
5 effectuate the sale of firearms.

6 D. OVERT ACTS

7 33. In furtherance of the conspiracy and to accomplish its
8 object, on or about the following dates, defendants GURLAL SINGH,
9 SAHIBDEEP SINGH, and MAJOR SINGH, and others known and unknown to the
10 Grand Jury, committed various overt acts within the Central District
11 of California and elsewhere, including, but not limited to, Overt
12 Acts 21 through 25, as set forth in Count One of this Indictment,
13 which are realleged and incorporated here.

14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT SEVEN

[18 U.S.C. § 922(o)(1)]

[DEFENDANT GURLAL SINGH]

34. On or about September 4, 2025, in San Bernadino County, within the Central District of California, defendant GURLAL SINGH, also known as "Gurlal Rudiana" and "Gullu," knowingly possessed a machinegun, as defined in Title 18, United States Code, Section 921(a)(24), and Title 26, United States Code, Section 5845(b), that defendant GURLAL SINGH knew to be a machinegun, namely, a Polymer80, model PF940V2, 9mm Luger caliber pistol, bearing no serial number, equipped with a machinegun conversion device, that was designed and intended, solely and exclusively, for use in converting a weapon into a machinegun.

1 FORFEITURE ALLEGATION ONE

2 [18 U.S.C. § 1963]

3 1. Pursuant to Federal Rule of Criminal Procedure 32.2, notice
4 is hereby given that the United States of America will seek
5 forfeiture as part of any sentence, pursuant to Title 18, United
6 States Code, Section 1963, and Title 28, United States Code, Section
7 2461(c), in the event of any defendant's conviction of the offense
8 set forth in Count One of this Indictment.

9 2. Any defendant so convicted shall forfeit to the United
10 States of America the following:

11 (a) Any interest the convicted defendant has acquired or
12 maintained as a result of any such offense;

13 (b) Any interest in, security of, claim against, or
14 property or contractual right of any kind affording a source or
15 influence over, any enterprise which the convicted defendant has
16 established, operated, controlled, conducted, or participated in the
17 conduct of, as a result of any such offense;

18 (c) Any property constituting, or derived from, any
19 proceeds which the person obtained, directly or indirectly, from
20 racketeering activity or unlawful debt collection as a result of any
21 such offense; and

22 (d) To the extent such property is not available for
23 forfeiture, a sum of money equal to the total value of the property
24 described in subparagraphs (a), (b), and (c).

25 3. Pursuant to Title 18, United States Code, Section 1963(m),
26 any defendant so convicted shall forfeit substitute property, up to
27 the total value of the property described in the preceding paragraph
28 if, as the result of any act or omission of said defendant, the

1 property described in the preceding paragraph, or any portion thereof
2 (a) cannot be located upon the exercise of due diligence; (b) has
3 been transferred, sold to or deposited with a third party; (c) has
4 been placed beyond the jurisdiction of the court; (d) has been
5 substantially diminished in value; or (e) has been commingled with
6 other property that cannot be divided without difficulty.

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

FORFEITURE ALLEGATION TWO

[18 U.S.C. §§ 981(a)(1)(C), 924(d)(1) and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 924(d)(1), and Title 28, United States Code, Section 2461(c), in the event of any defendant's conviction of the offense set forth in Count Two of this Indictment.

2. Any defendant so convicted shall forfeit to the United States of America the following:

(a) All right, title, and interest in any and all property, real or personal, constituting, or derived from, any proceeds traceable to any such offense;

(b) All right, title, and interest in any firearm or ammunition involved in or used in any such offense; and

(c) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraphs (a) and (b).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), any defendant so convicted shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of said defendant, the property described in the preceding paragraph or any portion thereof (a) cannot be located upon the exercise of due diligence; (b) has been

//

//

1 transferred, sold to, or deposited with a third party; (c) has been
2 placed beyond the jurisdiction of the court; (d) has been
3 substantially diminished in value; or (e) has been commingled with
4 other property that cannot be divided without difficulty.

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 FORFEITURE ALLEGATION THREE

2 [21 U.S.C. § 853]

3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States of America
5 will seek forfeiture as part of any sentence, pursuant to Title 21,
6 United States Code, Section 853 and Title 28, United States Code,
7 Section 2461(c), in the event of any defendant's conviction of the
8 offenses set forth in any of Counts Three or Four of this Indictment.

9 2. Any defendant so convicted shall forfeit to the United
10 States of America the following:

11 (a) All right, title and interest in any and all property,
12 real or personal, constituting or derived from, any proceeds which
13 the defendant obtained, directly or indirectly, from any such
14 offense;

15 (b) All right, title and interest in any and all property,
16 real or personal, used, or intended to be used, in any manner or
17 part, to commit, or to facilitate the commission of any such offense;
18 and

19 (c) To the extent such property is not available for
20 forfeiture, a sum of money equal to the total value of the property
21 described in subparagraphs (a) and (b).

22 3. Pursuant to Title 21, United States Code, Section 853(p),
23 any defendant so convicted shall forfeit substitute property if, by
24 any act or omission of the defendant, the property described in the
25 preceding paragraph, or any portion thereof: (a) cannot be located
26 upon the exercise of due diligence; (b) has been transferred, sold

27 //

28 //

1 to, or deposited with a third party; (c) has been placed beyond the
2 jurisdiction of the court; (d) has been substantially diminished in
3 value; or (e) has been commingled with other property that cannot be
4 divided without difficulty.

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 FORFEITURE ALLEGATION FOUR

2 [21 U.S.C. § 853; 18 U.S.C. § 924; 28 U.S.C. § 2461(c)]

3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States of America
5 will seek forfeiture as part of any sentence, pursuant to Title 21,
6 United States Code, Section 853, Title 18, United States Code,
7 Section 924, and Title 28, United States Code, Section 2461(c), in
8 the event of any defendant's conviction of the offenses set forth in
9 any of Counts Five through Seven of this Indictment.

10 2. Any defendant so convicted shall forfeit to the United
11 States of America the following:

12 (a) All right, title and interest in any and all property, real
13 or personal, constituting or derived from, any proceeds which the
14 defendant obtained, directly or indirectly, from any such offense;

15 (b) All right, title and interest in any and all property, real
16 or personal, used, or intended to be used, in any manner or part, to
17 commit, or to facilitate the commission of any such offense;

18 (c) All right, title, and interest in any firearm or
19 ammunition involved in or used in any such offense; and

20 (d) To the extent such property is not available for
21 forfeiture, a sum of money equal to the total value of the property
22 described in subparagraphs (a), (b), and (c).

23 3. Pursuant to Title 21, United States Code, Section 853(p),
24 any defendant so convicted, shall forfeit substitute property if, by
25 any act or omission of said defendant, the property described in the
26 preceding paragraph, or any portion thereof: (a) cannot be located
27 upon the exercise of due diligence; (b) has been transferred, sold
28 to, or deposited with a third party; (c) has been placed beyond the


1 jurisdiction of the court; (d) has been substantially diminished in
2 value; or (e) has been commingled with other property that cannot be
3 divided without difficulty.

4
5 A TRUE BILL

6
7 /S/
8 Foreperson

9
10 TODD BLANCHE
Acting Attorney General

11 BILAL A. ESSAYLI
12 First Assistant United States Attorney

13 

14 JENNIFER L. WAIER
15 Chief Assistant United States Attorney &
Chief, Criminal Division

16 J. MARK CHILDS
17 Assistant United States Attorney
Chief, Transnational Organized Crime
Section

18 DECLAN T. CONROY
19 Assistant United States Attorney
20 Deputy Chief, Transnational Organized
Crime Section