

THE GRAND JURY CHARGES:

COUNT ONE

Continuing Criminal Enterprise

(Vio. 21 U.S.C. § 848)

Between the dates of 1975 and June 16, 2006, in Idaho, Oregon, Washington, California, Colorado, New Mexico, Utah, Nevada, Hawaii, Wyoming, South Dakota, North Dakota, Iowa, Nebraska, Minnesota, Wisconsin, Indiana, Ohio, Pennsylvania, Kentucky, New York, and elsewhere, **KENT ALLEN JONES, GREGORY FRANK SPEROW, MARK DANIEL KITZMAN, GERALD FRANCIS MCDONALD, DENNIS BRUCE HAMMONS, and HAROLD CARL BALLENGER**, defendants herein, did engage in a Continuing Criminal Enterprise, in that they did violate Title 21, United States Code, §§ 841(a)(1), 841(b)(1)(B), 841(b)(1)(A), 843(b), 846, 854, 856, 952, 960, and 963, among others, which violations were part of a continuing series of violations of the Controlled Substances Act, Title 21, United States Code, Section 801, *et seq.*, undertaken by the defendants in concert with at least five other persons, with respect to whom the defendants occupied positions of organizers, supervisors, or managers, and from which series of violations the defendants obtained substantial income or resources.

AT ALL TIMES RELEVANT TO THIS INDICTMENT:

Methamphetamine and cocaine are Schedule II controlled substances. Marijuana and hashish are Schedule I controlled substances.

KENT ALLEN JONES (hereafter “KENT JONES” or “JONES”) has been involved in the importation, manufacture and distribution of controlled substances since the late 1970s when he began working with GREGORY FRANK SPEROW, (hereafter “GREG SPEROW” or “SPEROW”), GERALD FRANCIS MCDONALD, (hereafter “GERALD MCDONALD” or

“MCDONALD”), MARK M. ALDERS (hereafter “MARK ALDERS” or “ALDERS”) and others. At first, JONES worked under MCDONALD in the drug trafficking enterprise. On April 28, 1983, JONES, ALDERS, and others were indicted in two separate indictments in San Diego, California for their roles in conspiracies to import and distribute approximately 200,000 pounds of marijuana, which crimes occurred between 1978 and 1981. Although not indicted in those cases, SPEROW and MCDONALD were identified in the JONES/ALDERS indictments as co-conspirators.

On April 3, 1984, JONES pled guilty to a Superseding Information charging him with Conspiracy to Possess a Controlled Substance with Intent to Distribute. JONES was sentenced to five years of federal probation on June 4, 1984. As part of his probation, JONES was required to obey all laws, be fully employed within 60 days, and reveal the location of any contraband. JONES was prohibited from using or possessing drugs, or associating with drug dealers. Although JONES continued his involvement in drug trafficking while on probation, it was not discovered and JONES was granted early release from probation on March 24, 1988.

Prior to the JONES/ALDERS indictments, on September 18, 1980, GREG SPEROW and GERALD MCDONALD were also charged in San Diego, California for their involvement in conspiracies to import and distribute 4,000 pounds of cocaine and 200,000 pounds of marijuana, which acts occurred in 1979 and 1980. MCDONALD and SPEROW were subsequently convicted on these charges and sentenced to federal prison. When MCDONALD went to prison, JONES took over MCDONALD’s drug business. Since that time, JONES’ drug importation and distribution activities have continued unabated.

In addition to importing and smuggling controlled substances, JONES has consistently been involved in the manufacture and distribution of marijuana. Much of the marijuana sold by JONES was manufactured through indoor and outdoor marijuana growing operations, which

were organized as marijuana growing cooperatives set up by a close working group of family members and long-term friends, many of whom have been associates of JONES since high school. JONES also distributed large quantities of bulk marijuana imported from Mexico.

Over the years, JONES has claimed ownership in or employment by a number of businesses, including some of those listed below. JONES has also declared considerable gambling winnings over the years in an effort to disguise the true source of the bulk of his income, which he obtained through drug trafficking.

JONES has used a number of aliases, including “Honcho,” “KJ,” “Randy,” “BB,” “Jack,” Tom Barnet and other fictitious names in order to avoid detection by law enforcement.

GREGORY FRANK SPEROW has been involved in the importation, manufacture and distribution of cocaine, methamphetamine and marijuana since the mid-1970s. On August 20, 1975, SPEROW was arrested and charged in New Mexico for smuggling 1,330 pounds of marijuana into the United States from Mexico. On January 5, 1976, SPEROW was arrested at the Monroe County, New York airport in possession of 30 pounds of marijuana. On February 2, 1976, SPEROW was sentenced in the New Mexico case to 15 years in federal prison. On March 9, 1979, he was released on parole, at which time he immediately again became involved in the importation and distribution of drugs.

Beginning in 1979, SPEROW was involved with MCDONALD, JONES, ALDERS and others in the importation and sale of large quantities of cocaine and marijuana. As a result, on September 18, 1980, SPEROW and MCDONALD were indicted in San Diego, California for their involvement in conspiracies to import and distribute 4,000 pounds of cocaine and 200,000 pounds of marijuana, along with charges associated with moving \$1.5 million in U.S. currency out of the United States. SPEROW was subsequently convicted of these charges and sentenced

to 15 years federal prison on March 23, 1981. He was released on parole on July 29, 1986, at which time he immediately again became involved in the importation and distribution of drugs.

On February 14, 1996, SPEROW was indicted in the District of Oregon for his role in the distribution of 237 pounds of marijuana, which SPEROW caused to be shipped from California to Portland, Oregon in January 1996. Between January 1996 and May 2004, SPEROW was a federal fugitive from these charges. As a fugitive, SPEROW lived under several assumed names, including Greg Westbrook, and continued to conduct drug trafficking and money laundering activities, including the purchasing of property in the names of nominee businesses.

On September 22, 2005, SPEROW was convicted by a jury of Possession of Marijuana with the Intent to Distribute in the District of Oregon. On September 22, 2005, he was sentenced to ten years in federal prison. Despite a number of criminal convictions and prison sentences over the last 30 years, SPEROW has amassed and concealed millions of dollars in assets derived from his drug trafficking activities.

MARK DANIEL KITZMAN (hereafter “MARK KITZMAN” or “KITZMAN”) has been one of KENT JONES' closest criminal associates since at least the mid-1980s. On October 2, 1991, KITZMAN was arrested in Douglas County, Oregon for conspiracy to manufacture and distribute marijuana. He was convicted by a jury on June 25, 1993 and sentenced to 21 months in state prison on September 8, 1993. He was released from prison on February 13, 1995, at which time he immediately again became involved in the distribution of drugs.

KITZMAN has also been involved with JONES in the distribution of kilogram quantities of cocaine and the indoor manufacturing of marijuana. Between 2000 and 2004, KITZMAN and JONES financed, and assisted in setting up, a number of marijuana grow houses in the Portland, Oregon area. KITZMAN has invested some of his drug proceeds in Idaho.

GERALD FRANCIS MCDONALD has been involved in the importation, manufacture and distribution of controlled substances, including cocaine, marijuana, and methamphetamine since the late 1970s. Beginning in 1979, MCDONALD was involved with SPEROW, JONES, ALDERS and others in the importation and sale of large quantities of cocaine and marijuana. As a result, on September 18, 1980, MCDONALD and SPEROW were indicted in San Diego, California for their involvement in conspiracies to import and distribute 4,000 pounds of cocaine and 200,000 pounds of marijuana. MCDONALD was subsequently convicted of conspiracy to import 200,000 pounds of marijuana and conspiracy to transport \$1.5 million in U.S. currency out of the United States. On February 16, 1982, MCDONALD was sentenced to ten years in federal prison. He was released on parole on March 24, 1987, at which time he immediately again became involved in the importation and distribution of drugs.

On April 27, 1990, MCDONALD was arrested in El Segundo, California after purchasing 30 kilograms of cocaine for \$660,950. On January 15, 1991, MCDONALD was sentenced to 10 years in prison where he continued to be involved in drug trafficking. MCDONALD was released from prison on October 15, 1993, at which time he immediately again became involved in the distribution of drugs.

MCDONALD has resided primarily in Southern California and Idaho, and has also frequented the Days Creek area of Oregon. Through his criminal connections, large quantities of drugs were imported into the United States from Colombia and Mexico. MCDONALD has continued to be involved in the enterprise even while serving time in prison. Over the years, MCDONALD has employed various relatives in his drug trafficking business, including his wife, ex-wife, girlfriends, brothers, son, and nephew.

HAROLD CARL BALLENGER (hereafter “HAROLD BALLENGER” or “BALLENGER”) has been involved in the manufacture and distribution of marijuana since at

least 1980. Over the years, BALLENGER has worked closely with family members, KENT JONES, DENNIS HAMMONS and others in growing and distributing drugs across the country. Beginning in 1999, BALLENGER and his brother transported large quantities of marijuana to customers in Ohio. In October 2000, BALLENGER was involved with DENNIS HAMMONS and others in a conspiracy to distribute 1,137 pounds of marijuana near Bend, Oregon. Most recently, BALLENGER was involved in the transportation and sale of 100s of pounds of marijuana in the Cleveland, Ohio area.

Over the years, BALLENGER has made numerous trips to Mexico as part of his drug trafficking and money laundering activities.

DENNIS BRUCE HAMMONS (hereafter “DENNIS HAMMONS” or “HAMMONS”) is a native of California who began a criminal association with KENT JONES and his criminal associates by at least 1984 when HAMMONS was a marijuana and hashish source of supply for LL, who lived in Idaho. Beginning in the mid-1980s, HAMMONS owned a garden supply business in Oregon which supplied marijuana growers, including JONES and his associates, with necessary supplies and equipment. HAMMONS has also been a distributor of large quantities of cocaine.

On July 12, 1998, HAMMONS was arrested and charged in Coos Bay, Oregon after he negotiated the purchase of 5 kilograms of cocaine. During these negotiations, KENT JONES called HAMMONS at his hotel. HAMMONS was charged with conspiracy to distribute cocaine and sentenced in 1989 to six years in prison. Upon his release from prison, HAMMONS immediately again became involved in the distribution of drugs.

In January 1995, HAMMONS was again arrested - this time for attempting to sell 120 pounds of marijuana to an undercover agent in Pinole, California. Shortly thereafter, HAMMONS obtained a false passport in his deceased brother's name.

In October 2000, HAMMONS was indicted in Oregon after his attempted possession of 1,137 pounds of marijuana in Bend, Oregon. While a fugitive on this charge, HAMMONS frequently traveled to and from Mexico using fictitious names. In 2002, HAMMONS pled guilty to conspiracy to distribute marijuana and was sentenced to five years in prison. He is currently residing in the Medford, Oregon area on probation from that charge.

HAMMONS is known to have used the following aliases, among others: Robert Hammons, Robert Westley, and Robert West, which he has used to obtain cell phones, driver's licenses, and passports. He has used this false identification to disguise his many trips in and out of the United States in furtherance of his drug trafficking activities.

Unindicted Co-conspirators and Other Criminal Associates

A number of persons who were organized, supervised, or managed by the defendants, or who otherwise assisted in the operation of the enterprise as co-conspirators and criminal associates, are listed in this Indictment by letters in order to assist in the identification of specific transactions and events, and to explain the manner and means by which the defendants accomplished the objects of their criminal enterprise.

Objects of the Enterprise

The objects of this criminal enterprise include, but are not limited to, the following:

- a. To manufacture, smuggle, import, offload, purchase, transport, distribute, conceal, and invest in large quantities of controlled substances, including methamphetamine, cocaine, marijuana and hashish;
- b. To reap profits from the sale of these controlled substances;
- c. To invest these profits in additional drug trafficking activities;
- d. To "launder" these profits in an effort to "legitimize" the drug proceeds, reap additional profits, and further the enterprise;

- e. To travel, and use facilities, in interstate and foreign commerce, with the intent to commit drug and money laundering crimes against the United States;
- f. To travel, and use facilities, in interstate and foreign commerce, with the intent to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of the enterprise;
- g. To travel, and use facilities, in interstate and foreign commerce, in order to distribute the proceeds of drug trafficking and money laundering;
- h. To promote unlawful drug trafficking and related money laundering activity by conducting financial transactions;
- i. To conceal and disguise the nature, location, source, ownership and control of the illegal proceeds obtained from drug trafficking and money laundering;
- j. To avoid transaction reporting requirements regarding financial transactions, and to cause financial institutions to do the same;
- k. To provide apparent sources of legitimate income which would justify expenditures, lifestyles, and the acquisition of assets;
- l. To avoid paying taxes on millions of dollars of drug and money laundering income;
- m. To acquire real estate and other valuable assets from which to derive apparently legitimate income through rents, lease payments, sales proceeds, loans secured by property, and other forms of income, which gave the appearance of legitimate commercial activity, and concealed the drug origins of the money;
- n. To arrange and pay for legal representation of members of the enterprise through retained counsel in such a way as to prevent cooperation with law enforcement and/or disclosure of the criminal conduct of other members of the enterprise;

- o. To engage legal and financial professionals to advise and assist in avoiding detection of their illegal activities and income, through the creation of trusts, corporations, LLCs, partnerships, investments, financial and investment accounts, legitimate businesses, and other entities, in the names of nominees and in their own names;
- p. To create and use fictitious and misleading identities and identity documents to aid in traveling, conducting business, and maintaining their lifestyles while avoiding detection by law enforcement authorities and others;
- q. To do all of the above without detection by law enforcement authorities.

Means and Methods of the Enterprise

The means and methods used by the defendants and their associates to accomplish the objects of the conspiracy include, but are not limited to, the following:

The defendants and their associates were involved in the smuggling, importing, offloading, purchasing, transporting, packaging, distributing, concealing, and investing in large quantities of controlled substances, including methamphetamine, cocaine, marijuana and hashish.

The defendants and their associates were involved in the large-scale manufacturing (growing) of marijuana. Indoor grow sites were elaborately set up with lights, timers, watering/fertilizing devices, and other equipment designed to produce crops of high quality marijuana, which were then harvested and sold. Oftentimes, individuals would be recruited to purchase houses and/or other real property in order to facilitate these grows. Outdoor marijuana grow sites were also used extensively by the enterprise, on private and public lands.

The defendants and their associates would purchase properties for the purpose of operating indoor marijuana grows. These properties were often purchased and refinanced with loan funds obtained through the assistance of criminal associates, including sympathetic or

cooperative mortgage brokers who overlooked questions as to legitimate employment and sources of income.

The defendants and their associates would negotiate for the purchase of large quantities of controlled substances, which would then be transported and smuggled into the United States from Mexico, South American countries, and elsewhere.

The defendants and their associates would use a variety of contacts and sources to obtain, transport, ship, smuggle, off-load and distribute large quantities of controlled substances.

The defendants and their associates would directly take part in the smuggling, off-loading, transporting, storing, distributing, and concealing controlled substances, and would indirectly take part by employing others to do so.

The defendants and their associates would arrange for ships, boats, aircraft, trucks and private vehicles to transport controlled substances. The defendants would also hire people to sail, drive or fly controlled substances to various places. In addition, GREG SPEROW, as a pilot, would also fly drugs and money to various places.

The defendants and their associates would financially assist one another through the use of Western Union wire transfers while on the road picking up and delivering drugs and payments, and as a means of transporting currency.

The defendants and their associates would take quantities of controlled substances on consignment from others. These drugs would be sold and the drug debt paid off by members of the enterprise.

The defendants and their associates would sell quantities of controlled substances to others, and provide controlled substances on consignment to others.

The defendants and their associates would further promote the ongoing enterprise by laundering and concealing the illegal proceeds created by the enterprise, which proceeds came in

the form of large quantities of currency or other property. The proceeds were laundered and concealed through various financial transactions, expenditures, and investments including: secreting currency; transporting currency, monetary instruments and funds, interstate and intrastate, to numerous financial institutions and other locations; smuggling currency, monetary instruments and funds out of the United States; converting currency into cashier's checks and money orders; depositing currency, monetary instruments and funds into various bank accounts; commingling currency from illegal activity together with funds from legitimate sources and pseudo-legitimate sources; depositing currency and monetary instruments and funds into various "shell" or "shelf" corporation accounts; using casinos to launder money; transferring drug proceeds through a variety of bank accounts and businesses; transferring drug proceeds to other co-conspirators by wire and other means; investing drug proceeds in various real properties, businesses, stocks and other investments; filing false tax returns which were designed to disguise and conceal the extent of their drug and money laundering; and creating additional income through the investment of drug proceeds.

The defendants and their associates would invest drug proceeds in various real properties and other investments. Through the sale of these investments, the defendants and their associates were able to create the appearance of legitimate income and reap additional profits. The drug proceeds retrieved through the sale of the investments, coupled with the illegal profits acquired through the investments, would then be reinvested in additional properties, businesses and other acquisitions. Often, property purchased in this manner would then be improved using additional drug proceeds as they were accumulated. In addition, real property purchased with drug proceeds would be used as security/collateral for mortgage loans or real property lines of credit which provided the defendants and their associates with hundreds of thousands of dollars in apparent legitimate funds to pay debts and acquire assets.

The defendants and their associates would participate in the collection, counting, transporting, laundering and investment of drug proceeds generated by the enterprise.

The defendants and their associates would establish interrelated domestic corporate entities and bank accounts which would be used to launder illegal drug profits.

The defendants would also falsely claim monies obtained through inheritances and gambling winnings, or exaggerate the size of inheritances and gambling winnings, for the purpose of disguising drug and money laundering profits.

The defendants and their associates would use a variety of aliases and nicknames in order to avoid detection by the police. These aliases were used to disguise the criminal activities of the enterprise, which included their ownership or use of real property, rental property, cars, trucks, cell phones, pagers, other property or investments and financial transactions. Oftentimes, the defendants and their associates used these aliases when meeting other people in the drug business in order to reduce the chance of their identification through cooperating witnesses. In disguising their identities, the defendant would also obtain or attempt to obtain false forms of identification, including passports.

The defendants and their associates would use cell phones, prepaid or "throw away" phones, pay phones, pagers and other communication devices to avoid conversations being monitored by the police through court ordered wiretaps, pen registers, trap and trace devices, and consensual monitoring by a third party. It was the practice of the defendants and their associates to purchase pre-paid phones in false names. It was also the practice of the defendants and their associates to use pagers and pay phones to conduct their drug business.

The defendants and their associates would create and use nominees and nominee entities including "shell" or "shelf" corporations, trusts, foundations, partnerships and other businesses and personal entities, in a variety of forms and names, in order to provide legitimate fronts for

their income, expenditures, lifestyles and assets, and to conceal sources of income and the extent of their assets. In so doing, the defendants and their associates would use the “corporate veil” to conceal or disguise their interests in various investments and transactions. In addition, the defendants and their associates would use legally created entities to commingle drug proceeds with actual, legitimate inheritance and trust monies, giving the appearance of a legitimate source for large amounts of otherwise unexplained money.

The defendants and their associates would accomplish much of the activity listed in this indictment, including the conduct of their financial affairs, through or with the help of attorneys, accountants, money managers, and other professionals in order to give an air of legitimacy to their transactions, to give the appearance of complying with the law, to avoid the creation of any public record upon which or in which their true names or identities would appear, to make it more difficult to trace their criminal proceeds, to provide legal advice on how to carry out their criminal activities without being caught, to ensure that their associates who were arrested received little, if any, punishment, and to ensure that their associates did not cooperate with the police by providing information regarding the defendants and their associates. Much of the criminal activity was accomplished through the help of a particular attorney (hereafter referred to as “Attorney A”). The defendants used Attorney A and his client trust account to launder large quantities of currency. Attorney A is one of the “associates” of the enterprise. The defendants also used and benefitted from the services of Attorney B in the concealment of GREG SPEROW’s identity and business activities during the time he was a fugitive and while in custody.

Along with the services of Attorney A, the defendants would provide assistance with bail, securing legal services and other financial assistance to co-conspirators who were arrested

for drugs or other criminal activities. This money, in part, was designed to discourage their associates from cooperating with the police against the defendants.

Some of the entities, businesses and investments, which are used by the defendants and their associates to accomplish these objectives, are described briefly below:

- AMERICAN BEST DRIVING SCHOOL - A California business listed as purchaser of cashier's checks which were deposited to GREG SPEROW's Silverado bank account.
- "ALL AMERICAN TIRE" and "ALL AMERICAN" - A California company used by JD to purchase cashier's checks with currency for GREG SPEROW.
- APOLLO TIRE - A California company where JD worked and which was used to purchase cashier's checks with currency for GREG SPEROW.
- CARIBBEAN RESOURCE GROUP - Source of funds for the purchase of the GREG SPEROW Lancaster Property.
- ENHANCED FINANCIAL SERVICES, INC. - A corporation associated with JRM. Its name appears on cashier's checks, purchased with currency, which were deposited into one of KENT JONES' accounts.
- FOUR POINT CONSTRUCTION, INC. - A Colorado company created by GREG SPEROW and DALE BARKER. Four Point bank accounts were used to make deposits and withdrawals out of the Silverado accounts.
- INFINITY FINANCIAL GROUP, LLC - Idaho mortgage company with business locations in Priest River and Post Falls, Idaho. JEROD KEYSER is the owner and the registered agent. Infinity has arranged loans on properties involving MARK KITZMAN, KENT JONES and other individuals associated with the

enterprise, including loans on properties acquired and used to manufacture marijuana.

- JOHNSON WIRE ROPE - A Roseburg, Oregon company in which KENT JONES had an interest with TJ, and which JONES has listed as his employer and source of income.
- KENT AND MARGO JONES REVOCABLE TRUST - Various properties belonging to KENT JONES were placed in this trust's name on December 2, 2004 (recorded January 25, 2005).
- LIBRA AIR PARTS - A California company owned and operated by JB and GREG SPEROW. This company did business under the name of Western European Enterprises and *vice versa*. The company was used by SPEROW to provide cell phones and to transact business with Max Air.
- MAX AIR AVIATION - A California company which was owned by GREG SPEROW and others and listed by SPEROW as his employer and source of income under his alias Greg Westbrook.
- MIA, INC. - A California company created by GREG SPEROW during the time he was a fugitive. It is associated with Max Air Aviation and was formerly known as NT-GWB, Inc. MIA, Inc. was the company under which SPEROW registered a fictitious business name for New Tech Construction.
- NEW TECH CONSTRUCTION AND DEVELOPMENT, INC. - A California company organized by GREG SPEROW in 1988 and partly used for a legitimate construction business and partly used as a money laundering tool and as a source of apparent employment and income by SPEROW.

- NORTHWEST NEW TECH - An Oregon company created by MARK KITZMAN and listed by him as his employer and source of income. It was used as a front for receipt of drug proceeds under the guise of payments on construction invoices.
- NT-GWB, INC. - A California corporation created and used by GREG SPEROW. In 2002, its name was changed to MIA, Inc.
- PONDEROSA CUSTOM HOMES, LLC - A Colorado company created by GREG SPEROW and DALE BARKER, with a business address located at a mailbox store. SPEROW and BARKER used this company to launder drug proceeds through cashier's checks deposited to a bank account held in Colorado.
- RAPTOR VIEW ESTATES, LLC - A company organized and used by KENT JONES, PK and TK to acquire, develop and sell real property in Idaho, including property located at Thama Ferry Road in Priest River, Idaho.
- SILVERADO CUSTOM HOMES, LLC - A Colorado company organized by GREG SPEROW and DALE BARKER soon after SPEROW became a fugitive in 1996. SPEROW and BARKER used this company to launder drug proceeds through cashier's checks deposited to a bank account held in Colorado. Funds from the account were used to purchase properties in California and Oregon. The Oregon property is adjacent to the Lakeside Resort property owned by JONES and was originally optioned for purchase by JONES.
- SPEROW FAMILY TRUST - Created by GREG SPEROW and family members in California on June 8, 1988. The Sperow Family Trust was used by GREG SPEROW to commingle proceeds of criminal activity with other monies through various bank accounts, and also used to hold title to real property.

- TEN MILE PROPERTIES, LLC - Also referred to in the Indictment as “Lakeside Report” property and “Easter Seal” property. An Oregon company organized and operated by KENT JONES for use of the real property, consisting of approximately 7.65 acres, located on Ten Mile Lake, Lakeside, Oregon., the property includes cabins rented, owned, and occupied by members of the enterprise, their associates and co-conspirators.
- WESTERN EUROPEAN ENTERPRISES - A Washington company created by JB, and used by GREG SPEROW to acquire and register an aircraft. This company did business under the name of Libra Air Parts and *vice versa*.

Series of Drug Violations

In furtherance of the enterprise, and to effect the objects thereof, in Idaho, Oregon, Washington, California, Colorado, New Mexico, Utah, Nevada, Hawaii, Wyoming, South Dakota, North Dakota, Iowa, Nebraska, Minnesota, Wisconsin, Indiana, Ohio, Pennsylvania, Kentucky, New York, and elsewhere, and on or about the dates, times and locations set forth below, KENT ALLEN JONES, GREGORY FRANK SPEROW, MARK DANIEL KITZMAN, GERALD FRANCIS MCDONALD, DENNIS BRUCE HAMMONS, and HAROLD CARL BALLENGER, defendants herein, in concert with their associates and co-conspirators, committed, and caused to be committed, a continuing series of felony drug violations, including, but not limited to, the acts set forth in Predicate Acts 1-98 below, and Count Two of this indictment.

The following descriptions of violations of 21 U.S.C. §§ 841(a)(1), 843(b), 846, 854, 856, 952 and 963, and 18 U.S.C. § 2, are to be applied to Acts 1 through 98 below, and are incorporated therein by reference.

Conspiracy to Import Controlled Substances

(Vio. 21 U.S.C. §§ 952 and 963)

On the approximate dates, times and locations set forth below, KENT ALLEN JONES, GREGORY FRANK SPEROW, MARK DANIEL KITZMAN, GERALD FRANCIS MCDONALD, DENNIS BRUCE HAMMONS, and HAROLD CARL BALLENGER, defendants herein, did knowingly and intentionally combine, conspire and agree with each other, and with other persons known and unknown to the grand jury, to knowingly and intentionally import Schedule I or II controlled substances into the customs territory of the United States from any place outside of the United States, in violation of 21 U.S.C. §§ 952 and 963.

Importation of Controlled Substances

(Vio. 21 U.S.C. §§ 952 and 963)

On the approximate dates, times and locations set forth below, KENT ALLEN JONES, GREGORY FRANK SPEROW, MARK DANIEL KITZMAN, GERALD FRANCIS MCDONALD, DENNIS BRUCE HAMMONS, and HAROLD CARL BALLENGER, defendants herein, did knowingly and intentionally import Schedule I or II controlled substances into the customs territory of the United States from any place outside of the United States, in violation of 21 U.S.C. §§ 952 and 963.

**Conspiracy to Manufacture/Distribute/Possess
With the Intent to Distribute Controlled Substances**

(Vio. 21 U.S.C. §§ 841(a)(1) and 846)

On the approximate dates, times and locations set forth below, KENT ALLEN JONES, GREGORY FRANK SPEROW, MARK DANIEL KITZMAN, GERALD FRANCIS MCDONALD, DENNIS BRUCE HAMMONS, and HAROLD CARL BALLENGER, defendants herein, did knowingly and intentionally combine, conspire and agree with each other, and with other persons known and unknown to the grand jury, to manufacture, distribute and

possess with the intent to distribute controlled substances, in violation of 21 U.S.C. §§ 841(a)(1) and 846.

Manufacturing Controlled Substances

(Viol. 21 U.S.C. §§ 841(a)(1) and 846)

On the approximate dates, times and locations set forth below, KENT ALLEN JONES, GREGORY FRANK SPEROW, MARK DANIEL KITZMAN, GERALD FRANCIS MCDONALD, DENNIS BRUCE HAMMONS, and HAROLD CARL BALLENGER, defendants herein, did knowingly and intentionally manufacture controlled substances, in violation of 21 U.S.C. §§ 841(a)(1) and 846.

**Distribute/Possess with Intent
To Distribute Controlled Substances**
(Viol. 21 U.S.C. §§ 841(a)(1) and 846)

On the approximate dates, times and locations set forth below, KENT ALLEN JONES, GREGORY FRANK SPEROW, MARK DANIEL KITZMAN, GERALD FRANCIS MCDONALD, DENNIS BRUCE HAMMONS, and HAROLD CARL BALLENGER, defendants herein, did knowingly and intentionally distribute and possess with the intent to distribute controlled substances, in violation of 21 U.S.C. §§ 841(a)(1) and 846.

Use of a Communication Facility
(Viol. 21 U.S.C. § 853(b))

On the approximate dates, times and locations set forth below, KENT ALLEN JONES, GREGORY FRANK SPEROW, MARK DANIEL KITZMAN, GERALD FRANCIS MCDONALD, DENNIS BRUCE HAMMONS, and HAROLD CARL BALLENGER, defendants herein, did knowingly and intentionally use a communication facility in committing or in causing or facilitating violations of 21 U.S.C. §§ 841(a)(1), 843(b), 846, 854, 856, 952, and 963, in violation of 21 U.S.C. § 853(b).

Investment of Illicit Drug Profits

(Viol. 21 U.S.C. § 854)

On the approximate dates, times and locations set forth below, KENT ALLEN JONES, GREGORY FRANK SPEROW, MARK DANIEL KITZMAN, GERALD FRANCIS MCDONALD, DENNIS BRUCE HAMMONS, and HAROLD CARL BALLENGER, defendants herein, having received income derived directly or indirectly from violations of 21 U.S.C. §§ 841(a)(1), 843(b), 846, 854, 856, 952, and 963, did use and invest, directly and indirectly, all or part of such income, and the proceeds of such income, in the acquisition of an interest in, and the establishment and operation of, any enterprise which is engaged in, or the activities of which affect, interstate and foreign commerce, in violation of 21 U.S.C. § 854.

Maintaining Drug-Involved Premises

(Viol. 21 U.S.C. §§ 856)

On the approximate dates, times and locations set forth below, the defendants, KENT ALLEN JONES; GREGORY FRANK SPEROW; MARK DANIEL KITZMAN; GERALD FRANCIS MCDONALD; DENNIS BRUCE HAMMONS; and HAROLD CARL BALLENGER, did knowingly and intentionally open, lease, rent, use and maintain a place for

the purpose of manufacturing and distributing controlled substances, or did manage or control a place as an owner, lessee, agent, employee, occupant, or mortgagee, and did knowingly and intentionally rent, lease, profit from, or make available for use the place for the purpose of unlawfully manufacturing, storing or distributing controlled substances, in violation of 21 U.S.C. § 856.

Aiding and Abetting Felony Drug Crimes

(Vio. 18 U.S.C § 2)

On the approximate dates, times and locations set forth below, KENT ALLEN JONES, GREGORY FRANK SPEROW, MARK DANIEL KITZMAN, GERALD FRANCIS MCDONALD, DENNIS BRUCE HAMMONS, and HAROLD CARL BALLENGER, defendants herein, did aid, abet, counsel, command, induce or procure the commission of crimes set forth in this Indictment, in violation of 18 U.S.C. § 2.

PREDICATE ACT 1

Importation of Marijuana

On August 20, 1975, in New Mexico, GREG SPEROW imported approximately 1,330 pounds of marijuana into the United States from the Republic of Mexico.

PREDICATE ACT 2

Possession of Marijuana with Intent to Distribute

On August 20, 1975, in New Mexico, GREG SPEROW possessed with intent to distribute approximately 1,330 pounds of marijuana.

PREDICATE ACT 3

Possession of Marijuana with Intent to Distribute

On January 5, 1976, at the Monroe County airport in Rochester, New York, GREG SPEROW possessed with intent to distribute approximately 30 pounds of marijuana.

PREDICATE ACT 4

Conspiracy to Import Cocaine

Beginning in 1979, and continuing up to and including September 11, 1980, in California and elsewhere, GREG SPEROW, GERALD MCDONALD and others conspired to import approximately 4,000 pounds of cocaine from Colombia, South America, into the United States.

PREDICATE ACT 5

Conspiracy to Possess with Intent to Distribute Cocaine

Beginning in 1979, and continuing up to and including September 11, 1980, in California and elsewhere, GREG SPEROW, GERALD MCDONALD and others conspired to possess with the intent to distribute approximately 4,000 pounds of cocaine.

PREDICATE ACT 6

Conspiracy to Import Marijuana

Beginning in 1979, and continuing up to and including September 11, 1980, in California and elsewhere, GREG SPEROW, GERALD MCDONALD and others conspired to import approximately 200,000 pounds of marijuana into the United States.

PREDICATE ACT 7

Conspiracy to Possess with Intent to Distribute Marijuana

Beginning in 1979, and continuing up to and including September 11, 1980, in California and elsewhere, GREG SPEROW, GERALD MCDONALD and others conspired to possess with the intent to distribute approximately 200,000 pounds of marijuana.

PREDICATE ACT 8

Conspiracy to Import Marijuana

Beginning on an unknown date, and continuing up to and including September 1980, in California and elsewhere, KENT JONES, GREG SPEROW, GERALD MCDONALD, MARK ALDERS and others conspired to import approximately 200,000 pounds of marijuana into the United States.

PREDICATE ACT 9

Conspiracy to Possess with Intent to Distribute Marijuana

Beginning on an unknown date, and continuing up to and including September 1980, in California and elsewhere, KENT JONES, GREG SPEROW, GERALD MCDONALD, MARK ALDERS and others conspired to possess with the intent to distribute approximately 200,000 pounds of marijuana.

PREDICATE ACT 10

Conspiracy to Possess with Intent to Distribute Marijuana

Beginning in October 1980 and continuing to November 1981, in California and elsewhere, KENT JONES, GREG SPEROW, GERALD MCDONALD, MARK ALDERS and others conspired to possess with the intent to distribute in excess of 1,000 pounds of marijuana.

PREDICATE ACT 11

Conspiracy to Manufacture/Distribute Marijuana

Between the dates of July 21 and August 14, 1980, in Douglas County, Oregon, KENT JONES, HAROLD BALLENGER, DJ, RN and others conspired to manufacture and distribute marijuana.

PREDICATE ACT 12

Manufacture/Distribute Marijuana

Between the dates of July 21 and August 14, 1980, in Douglas County, Oregon, KENT JONES, HAROLD BALLENGER, DJ, RN and others manufactured and possessed with the intent to distribute approximately 98 marijuana plants.

PREDICATE ACT 13

Possession of Marijuana with the Intent to Distribute

On April 24, 1981, in Oregon, KENT JONES possessed approximately 1,000 pounds of marijuana with the intent to distribute.

PREDICATE ACT 14

Possession of Marijuana with the Intent to Distribute

On October 24-25, 1981, in Oregon and California, KENT JONES possessed approximately 300 pounds of marijuana with the intent to distribute.

PREDICATE ACT 15

Manufacture/Distribute of Marijuana

On May 16, 1982, in Douglas County, Oregon, MS and NS manufactured and possessed with the intent to distribute 431 marijuana plants.

PREDICATE ACT 16

Conspiracy to Distribute/possess with Intent to Distribute Cocaine

Between the dates of June 1982 and September 4, 1983, in Oregon and elsewhere, KENT JONES, DB, RN and others conspired to distribute and possess with the intent to distribute more than five kilograms of cocaine.

PREDICATE ACT 17

Use of a Communication Facility

On May 19, 1983, in Oregon, KENT JONES knowingly and intentionally used a communication facility, that is: a telephone, to communicate with DB.

PREDICATE ACT 18

Use of a Communication Facility

On May 20, 1983, at approximately 11:36 a.m., in Oregon, KENT JONES knowingly and intentionally used a communication facility, that is: a telephone, to communicate with DB.

PREDICATE ACT 19

Use of a Communication Facility

On June 7, 1983, at approximately 9:07 a.m., in Oregon, KENT JONES knowingly and intentionally used a communication facility, that is: a telephone, to communicate with DB.

PREDICATE ACT 20

Manufacture/Distribute Marijuana

On May 17, 1984, in Douglas County, Oregon, MR and others manufactured and possessed with the intent to distribute approximately 29 marijuana plants.

PREDICATE ACT 21

Use of a Communication Facility

On June 7, 1983, in Oregon, KENT JONES knowingly and intentionally used a communication facility, that is: a telephone, to communicate with DB.

PREDICATE ACT 22

Use of a Communication Facility

On June 16, 1983, at approximately 9:27 a.m., in Oregon, KENT JONES knowingly and intentionally used a communication facility, that is: a telephone, to communicate with DB.

PREDICATE ACT 23

Conspiracy to Manufacture/Distribute Marijuana

In July 1985, in Jackson County, Oregon, KENT JONES, MS, MR and others conspired to manufacture and possess with the intent to distribute marijuana.

PREDICATE ACT 24

Manufacture/Distribute Marijuana

In July 1985, in Jackson County, Oregon, KENT JONES, MS, MR and others manufactured and possessed with the intent to distribute approximately 181 marijuana plants.

PREDICATE ACT 25

Conspiracy to Manufacture/Distribute Marijuana

Between the dates of April 2, 1986, and August 31, 1986, in Douglas County, Oregon, KENT JONES, HAROLD BALLENGER, GB and others conspired to manufacture and distribute marijuana.

PREDICATE ACT 26

Manufacture/Distribute Marijuana

Between the dates of April 2, 1986, and August 31, 1986, in Douglas County, Oregon, KENT JONES, HAROLD BALLENGER, GB and others manufactured and possessed with the intent to distribute approximately 114 marijuana plants.

PREDICATE ACT 27

Conspiracy to Distribute Hashish/Marijuana

Between 1988 and July 22, 1994, in Oregon, Idaho and elsewhere, KENT JONES, MARK KITZMAN, RMc, JF and others conspired to distribute more than 100 kilograms of hashish/marijuana.

PREDICATE ACT 28

Attempted Possession of Cocaine with the Intent to Distribute

On July 12, 1988, in Coos County, Oregon, DENNIS HAMMONS attempted to possess between 5-20 kilograms of cocaine with the intent to distribute.

PREDICATE ACT 29

Conspiracy to Distribute Cocaine

Between the dates of May 1988 and September 1989, in Oregon and elsewhere, KENT JONES, MARK KITZMAN, TB, PC and others conspired to distribute more than five kilograms of cocaine.

PREDICATE ACT 30

Distribution of Cocaine

In September 1989, in Portland, Oregon, MARK KITZMAN distributed approximately one kilogram of cocaine to TB. On September 20, 1989, TB was in possession of one-half pound of cocaine with the intent to distribute.

PREDICATE ACT 31

Manufacture/Distribute Marijuana

On September 24, 1989, in Douglas County, Oregon, KENT JONES, RN and others manufactured and possessed with the intent to distribute approximately 141 marijuana plants.

PREDICATE ACT 32

Possession of Marijuana with the Intent to Distribute

On September 24-28, 1989, in Douglas County, Oregon, RN was in possession of marijuana with the intent to distribute.

PREDICATE ACT 33

Possession of Cocaine with the Intent to Distribute

On April 27, 1990, in El Segundo, California, GERALD MCDONALD, using the fictitious name of Paul Bragan, possessed 30 kilograms of cocaine with the intent to distribute.

PREDICATE ACT 34

Manufacture/Distribute Marijuana

On May 14-15, 1991, in Douglas County, Oregon, KENT JONES, MARK KITZMAN, RN, WT and others manufactured and possessed with the intent to distribute approximately 640 marijuana plants.

PREDICATE ACT 35

Manufacture/Distribute Marijuana

On August 1, 1991, in Lane County, Oregon, KENT JONES, BS, KB, and other persons manufactured and possessed with the intent to distribute approximately 68 marijuana plants.

PREDICATE ACT 36

Manufacture/Distribute Marijuana

Between the dates of August 10 and September 12, 1991, in Coos County, Oregon, KENT JONES and MS manufactured and possessed with the intent to distribute approximately 332 marijuana plants.

PREDICATE ACT 37

Manufacture/Distribute Marijuana

Between the dates of September 9 and October 9, 1991, in Douglas County, Oregon, KENT JONES, MARK KITZMAN, BN, TJ and others manufactured and possessed with the intent to distribute over 100 marijuana plants.

PREDICATE ACT 38

Conspiracy to Manufacture/Distribute Marijuana

In February 1992, in Douglas County and Bend, Oregon, KENT JONES, HAROLD BALLENGER, MS, MR and others conspired to manufacture and distribute marijuana.

PREDICATE ACT 39

Possession of Marijuana with the Intent to Distribute

On February 28, 1992, in Douglas County, Oregon, MS and NS were in possession of approximately 10 pounds of marijuana with the intent to distribute.

PREDICATE ACT 40

Possession of Marijuana with the Intent to Distribute

Between the dates of December 3 and December 12, 1992, in Lake Oswego, Oregon, KENT JONES possessed 50-100 pounds of marijuana with the intent to distribute.

PREDICATE ACT 41

Use of a Communication Facility

On March 5, 1993, in Oregon and Idaho, KENT JONES used a communication facility, that is: a telephone, to call LL at the Pit Stop in Kamiah, Idaho.

PREDICATE ACT 42

Use of a Communication Facility

On March 12, 1993, in Oregon and Idaho, KENT JONES used a communication facility, that is: a telephone, to call LL in Lewiston, Idaho.

PREDICATE ACT 43

Distribution of Marijuana

On May 5 and 6, 1993, in Oregon and Idaho, MARK KITZMAN delivered two duffle bags of marijuana to LL at the Sun River Lodge and Resort in Sun River, Oregon.

PREDICATE ACT 44

Distribution of Marijuana

In 1993, in Oregon and Idaho, MARK KITZMAN delivered in excess of 50 pounds of marijuana to the residence of LL in Idaho County, Idaho.

PREDICATE ACT 45

Distribution of Marijuana

On December 27, 1994, in Oregon and Idaho, KENT JONES distributed between 200 and 500 pounds of marijuana to LL in Portland, Oregon.

PREDICATE ACT 46

Conspiracy to Distribute Marijuana

In January 1995, in California and Oregon, DENNIS HAMMONS and others conspired to distribute approximately 120 pounds of marijuana.

PREDICATE ACT 47

Possession of Marijuana with the Intent to Distribute

On January 31, 1995, in Pinole, California and Medford, Oregon, DENNIS HAMMONS was in possession of approximately 138 pounds of marijuana with the intent to distribute.

PREDICATE ACT 48

Distribution of Marijuana

In July 1995, in Oregon and Idaho, KENT JONES distributed 500 pounds of marijuana to LL in Portland, Oregon.

PREDICATE ACT 49

Conspiracy to Manufacture/Distribute Methamphetamine

Between November 1995 and January 1996, in California, GREG SPEROW and others conspired to manufacture and distribute over 500 grams of methamphetamine.

PREDICATE ACT 50

Conspiracy to Distribute Marijuana

Between November 1995 and January 12, 1996, in California, Oregon, and elsewhere, KENT JONES, GREG SPEROW, BR, BS and others conspired to distribute over 100 kilograms of marijuana.

PREDICATE ACT 51

Distribution of Marijuana

On January 8, 1996, in California and Oregon, GREG SPEROW and BR shipped a box containing approximately 237 pounds of marijuana to Portland, Oregon.

PREDICATE ACT 52

Distribution of Marijuana

On January 8, 1996, in California and Ohio, GREG SPEROW and BR shipped a box

containing approximately 343 pounds of marijuana to Cleveland, Ohio.

PREDICATE ACT 53

Distribution of Marijuana

On January 8, 1996, in California and Pennsylvania, GREG SPEROW and BR shipped a box containing approximately 132 pounds of marijuana to Philadelphia, Pennsylvania.

PREDICATE ACT 54

Attempted Possession of Marijuana with the Intent to Distribute

On January 10, 1996, at the Portland International Airport, GREG SPEROW attempted to possess 237 pounds of marijuana with the intent to distribute.

PREDICATE ACT 55

Possession of Marijuana with the Intent to Distribute

On January 16, 1996, at his residence at 36 N. Berkeley Avenue, Pasadena, California,. GREG SPEROW possessed approximately 175 pounds of marijuana with the intent to distribute.

PREDICATE ACT 56

Manufacture/Distribute Marijuana

On September 20, 1996, in Douglas County, Oregon, TJ and NB manufactured and possessed with the intent to distribute approximately 112 marijuana plants at four different locations.

PREDICATE ACT 57

Possession of Marijuana with the Intent to Distribute

On October 29, 1997, in Portland, Oregon, DAMON MARSH was in possession of one-quarter pound of marijuana with the intent to distribute.

PREDICATE ACT 58

Possession of Marijuana with the Intent to Distribute

In July 1999, in Idaho and elsewhere, GERALD MCDONALD caused JMc to transport and possess with the intent to distribute approximately 98 pounds of marijuana near Gooding, Idaho.

PREDICATE ACT 59

Conspiracy to Distribute Marijuana

Between the dates of December 1999 and July 30, 2002, in Oregon, Idaho, and Ohio, HAROLD BALLENGER, GB and others conspired to distribute and possess with the intent to distribute over 100 kilograms of marijuana to JH and others in Ohio.

PREDICATE ACT 60

Distribution of Marijuana

Between December 1999 and March 2001, in Oregon, Ohio and elsewhere, HAROLD BALLENGER delivered approximately five loads of marijuana to JH in Cleveland, Ohio, with an average weight of 80-100 pounds per load.

PREDICATE ACT 61

Distribution of Marijuana

On January 28-30, 2000, in Washington and Idaho, KENT JONES distributed more than 250 pounds of marijuana to LL in Vancouver, Washington.

PREDICATE ACT 62

Distribution of Marijuana

In the spring of 2000, in Oregon and Idaho, MARK KITZMAN delivered in excess of 100 pounds of marijuana to the residence of LL in Idaho County, Idaho.

PREDICATE ACT 63

Possession of Marijuana with Intent to Distribute

On August 26, 2000, near Carlsbad, California, GERALD MCDONALD possessed approximately 100 pounds of marijuana with the intent to distribute.

PREDICATE ACT 64

Manufacture/Distribute Marijuana

On September 25, 2000, in Douglas County, Oregon, RN manufactured and possessed with the intent to distribute approximately 29 marijuana plants.

PREDICATE ACT 65

Conspiracy to Distribute Marijuana

In October 2000, in Oregon, Washington, and elsewhere, KENT JONES, DENNIS HAMMONS, HAROLD BALLENGER, RT and others conspired to distribute 1,137 pounds of marijuana near Bend, Oregon.

PREDICATE ACT 66

Attempted Possession of Marijuana with Intent to Distribute

On October 9-10, 2000, in Bend, Oregon and elsewhere, KENT JONES, DENNIS HAMMONS, HAROLD BALLENGER, RT and others attempted to possess approximately 1,137 pounds of marijuana with the intent to distribute.

PREDICATE ACT 67

Distribution of Marijuana

On December 21-22, 2000, in Washington and Idaho, KENT JONES distributed more than 300 pounds of marijuana to GH in Vancouver, Washington.

PREDICATE ACT 68

Distribution of Marijuana

In approximately December 2000, in Washington, Idaho, Kentucky, and elsewhere, GH distributed more than 300 pounds of marijuana to JR and JW in Kentucky.

PREDICATE ACT 69

Distribution of Marijuana

On January 19-22, 2001, in Washington and Idaho, KENT JONES distributed more than 300 pounds of marijuana to GH in Vancouver, Washington.

PREDICATE ACT 70

Distribution of Marijuana

In approximately January 2001, in Washington, Idaho, Kentucky, and elsewhere, GH distributed more than 300 pounds of marijuana to JR and JW in Kentucky.

PREDICATE ACT 71

Distribution of Marijuana

On February 9-10, 2001, in Washington and Idaho, KENT JONES distributed approximately 300 pounds of marijuana to GH in Vancouver, Washington.

PREDICATE ACT 72

Distribution of Marijuana

In approximately February 2001, in Washington, Idaho, Kentucky, and elsewhere, GH distributed more than 300 pounds of marijuana to JR and JW in Kentucky.

PREDICATE ACT 73

Distribution of Marijuana

On February 26-27, 2001, in Washington and Idaho, KENT JONES distributed approximately 300 pounds of marijuana to GH in Vancouver, Washington.

PREDICATE ACT 74

Distribution of Marijuana

In approximately February/March 2001, in Washington, Idaho, Kentucky, and elsewhere, GH distributed more than 300 pounds of marijuana to JR and JW in Kentucky.

PREDICATE ACT 75

Distribution of Marijuana

On May 29-30, 2001, in Washington and Idaho, KENT JONES distributed approximately 300 pounds of marijuana to GH in Vancouver, Washington.

PREDICATE ACT 76

Distribution of Marijuana

In approximately May/June 2001, in Washington, Idaho, Kentucky, and elsewhere, GH distributed more than 300 pounds of marijuana to JR and JW in Kentucky.

PREDICATE ACT 77

Distribution of Marijuana

On August 27-30, 2001, in Washington and Idaho, KENT JONES distributed more than 300 pounds of marijuana to GH in Vancouver, Washington.

PREDICATE ACT 78

Distribution of Marijuana

In approximately August/September 2001, in Washington, Idaho, Kentucky, and elsewhere, GH distributed more than 300 pounds of marijuana to JR and JW in Kentucky.

PREDICATE ACT 79

Distribution of Marijuana

In the fall of 2001, KENT JONES caused approximately 10 pounds of marijuana to be delivered to RH in Vancouver, Washington.

PREDICATE ACT 80

Use of a Communication Facility

In December 2001, in Oregon, Ohio and elsewhere, HAROLD BALLENGER used a communication facility, that is: a telephone, to call JH in Ohio to arrange for future loads of marijuana to be transported to Ohio by GB.

PREDICATE ACT 81

Distribution of Marijuana

Between January and June 2002, in Oregon, Idaho and Ohio, HAROLD BALLENGER caused GB to deliver at least three 80-100 pound loads of marijuana to JH in Cleveland, Ohio.

PREDICATE ACT 82

Distribution of Marijuana

In April 2002, in Washington and Idaho, KENT JONES distributed more than 300 pounds of marijuana to GH in Vancouver, Washington.

PREDICATE ACT 83

Distribution of Marijuana

In April 2002, in Washington and Idaho, GH distributed approximately 4 pounds of marijuana to LL in Clearwater, Idaho.

PREDICATE ACT 84

Distribution of Marijuana

Shortly after April 30, 2002, in Washington, Idaho, Kentucky, and elsewhere, GH transported more than 300 pounds of marijuana to JR and JW in Kentucky.

PREDICATE ACT 85

Manufacture/Distribute Marijuana

On September 24, 2002, in Tiller, Oregon, RN manufactured and possessed with intent to distribute 55 marijuana plants.

PREDICATE ACT 86

Manufacture/Distribute Marijuana

On October 4, 2002, in Tiller, Oregon, RN manufactured and possessed with intent to distribute 71 marijuana plants.

PREDICATE ACT 87

Possess with the Intent to Distribute Marijuana

On March 21, 2003, near Council Bluffs, Iowa, BN was in possession of approximately 200 pounds of marijuana with the intent to distribute.

PREDICATE ACT 88

Use of a Communication Facility

On March 23, 2003, in Washington, Colorado and elsewhere, KENT JONES used a communication facility, that is: a telephone, to call BN.

PREDICATE ACT 89

Conspiracy to Manufacture/Distribute Marijuana

Between 2001 and February 2004, in Washington, Oregon, Idaho, and elsewhere, KENT JONES, MARK KITZMAN, AW, EB, PO, RP, JM, MR1, DA and others conspired to manufacture and distribute marijuana.

PREDICATE ACT 90

Manufacture/Distribute Marijuana

On December 19, 2003, at a residence located at 4325 SW Pomona Street, Portland, Oregon, KENT JONES, MARK KITZMAN, AW and others manufactured and possessed with the intent to distribute approximately 115 marijuana plants.

PREDICATE ACT 91

Manufacture/Distribute Marijuana

On December 30, 2003, at a residence located at 12260 SW Hall Boulevard, Tigard, Oregon, KENT JONES, MARK KITZMAN, AW and others manufactured and possessed with intent to distribute approximately eight pounds of marijuana.

PREDICATE ACT 92

Manufacture/Distribute Marijuana

On December 30, 2003, at a residence located at 19800 SW Marlin Drive, Aloha, Oregon, KENT JONES, MARK KITZMAN, AW and others manufactured and possessed with intent to distribute approximately 42 marijuana plants.

PREDICATE ACT 93

Manufacture/Distribute Marijuana

On December 30, 2003, at a residence located at 12227 Lesser Road Portland, Oregon, KENT JONES, MARK KITZMAN, AW and others manufactured and possessed with intent to distribute approximately 50 marijuana plants.

PREDICATE ACT 94

Possession of Marijuana with Intent to Distribute

On January 22, 2004, in Oregon and Washington, PO was in possession of approximately 3 pounds of marijuana with the intent to distribute.

PREDICATE ACT 95

Possession of Marijuana with the Intent to Distribute

On May 26-27, 2004, at the Concord, California airport and his hotel room in Lafayette, California, GREG SPEROW possessed marijuana with the intent to distribute.

PREDICATE ACT 96

Use of a Communication Facility

In August 2005, DENNIS HAMMONS used a communication facility, that is: the U.S. mail, to send an "Application for a U.S. Passport by Mail" in the name of his deceased brother, Robert James Hammons.

PREDICATE ACT 97

Possession of Marijuana with the Intent to Distribute

On August 16-17, 2005, in Washington and Oregon, DAMON MARSH and ROBERT LONG were in possession of approximately 200 pounds of marijuana with the intent to distribute.

PREDICATE ACT 98

Possession of Marijuana with the Intent to Distribute

On June 4, 2006, in Medford, Oregon, MARK PURSLEY was in possession of approximately 200 pounds of marijuana with the intent to distribute.

Overt Acts in Furtherance of Predicate Acts 1 Through 98 Above

On March 31, 1978, RD purchased the vessel LESITA for the purpose of smuggling marijuana, from Colombia, South America, into the United States.

On July 13, 1978, RD and GERALD MCDONALD traveled to Hawaii for the purpose of locating an off-loading site and storage facility for marijuana to be imported aboard the vessel LESITA.

In March 1979, GERALD MCDONALD and others met at MCDONALD's residence in South Laguna, California and discussed the off-loading of marijuana from the vessel LESITA.

On March 20, 1979, RD and the vessel LESITA arrived in Long Beach, California carrying 1 ton of marijuana from Colombia, South America.

Between March 21-27, 1979, RD, GERALD MCDONALD, DD and others off-loaded approximately 3/4 of a ton of marijuana from the vessel LESITA. The marijuana was taken to MCDONALD's residence in South Laguna. Before the rest of the marijuana was off-loaded, the LESITA began to sink and approximately one-quarter ton of marijuana was thrown overboard. The marijuana which was successfully off-loaded was sold by MCDONALD, KENT JONES, MARK ALDERS and others.

On May 9, 1979, RD met with the Colombian sources of supply in Bogota, Colombia and discussed obtaining another load of marijuana and a replacement for the vessel LESITA.

On September 28, 1979, at Newport Beach, California, RD, using an assumed name, purchased the vessel RANSOM for the purpose of smuggling marijuana into the United States.

On October 3, 1979, at Laguna Beach, California, KENT JONES met with DD and

signed a California undocumented vessel certificate of ownership and a document agreeing to lease the RANSOM to RD under the false name of Willard Carston.

In October 1979, the vessel PROSEA II was purchased for the purpose of smuggling marijuana into the United States.

In November 1979, RD and another person, aboard the vessel RAMSOM, departed Long Beach, California bound for Colombia, South America, to obtain a one ton load of marijuana.

In late December 1979, RD and others, aboard the vessel RANSOM, departed Colombia, South America with one ton of marijuana.

On December 22, 1979, GREG SPEROW offered an airplane pilot (herein referred to as the pilot) \$50,000 to fly 1,200 pounds of marijuana from Mexico into the United States.

On December 26, 1979, DF called the pilot to determine if he was going to fly SPEROW's load of marijuana into the United States.

On December 29, 1979, GREG SPEROW and DF met with the pilot at the Riverside airport where SPEROW informed the pilot that the pickup site for the load of marijuana was Hermosillo, Mexico, and that the cargo would be 600 kilograms of marijuana. A hanger was rented for the airplane.

On January 3, 1989, in Riverside, California, DF informed the pilot that the marijuana had been sold to another party but that GREG SPEROW had just received two pounds of cocaine.

On February 5, 1980, GREG SPEROW and DF met the pilot at the Riverside airport and informed him that they had just returned from Hermosillo, Mexico where two loads of marijuana were now ready. The pilot was instructed to fly to Colima, Mexico for a checkout flight aboard a D-18 aircraft. SPEROW and DF also requested that the pilot fly 100 pounds of cocaine from Colombia into the United States in a Seneca II aircraft.

On February 7, 1980, GREG SPEROW and DF arrived at the Riverside, California airport in a Beechcraft "V" Tail Bonanza aircraft. DF met an undercover DEA pilot who was using the name "Blackie." Blackie had been secured by the group as a backup pilot. SPEROW was sitting at another table close by. DF told Blackie that he needed him to fly a Beechcraft aircraft containing 1,800 pounds of marijuana from Mexico to the Riverside area. DF then asked Blackie if he would go to Bogota, Colombia and pick up a Piper Seneca aircraft loaded with cocaine and fly it to Mexico. DF said there were three or four other "primaries" in the operation. After the agent left, DF met with GREG SPEROW again.

In February 1980, GERALD MCDONALD met with others to discuss payment for their participation in the smuggling of marijuana aboard the vessel PROSEA II.

In February 1980, after RD arrived in Long Beach harbor with approximately one ton of marijuana aboard the vessel RANSOM, RD, MARK ALDERS, GERALD MCDONALD and others met to discuss the off-loading of the marijuana from the RANSOM. RD, ALDERS, MCDONALD and others off-loaded the marijuana and transported it to RD's residence in Laguna Niguel, California. MCDONALD, JONES, ALDERS and others took quantities of marijuana from this location for distribution elsewhere. JONES, ALDERS and others, after selling the marijuana, paid MCDONALD.

On March 2, 1980, NF and others, aboard the vessel PROSEA II, departed San Diego, California, bound for Colombia, South America, for the purpose of smuggling marijuana into the United States.

In April 1980, DF paid \$40,000 toward the purchase of a DC-3 airplane.

In May 1980, the vessel PROSEA II arrived at Cabo Corrientes, Colombia, South America, to pick up 3 tons of marijuana. After being loaded, the crew and vessel departed for the United States.

On May 25, 1980, the vessel VALKYURE and crew departed San Diego, California, bound for Colombia, South America, for the purpose of smuggling marijuana into the United States.

On May 29, 1980, in Riverside, California, GREG SPEROW and DF met with the pilot who introduced them to a second backup pilot/co-pilot. SPEROW displayed to the backup pilot a map of Colombia and pointed out a landing strip approximately 170 miles south of Bogota as the site where 200 kilograms of cocaine and 6,000 pounds of marijuana would be loaded onto the DC-3 for transportation to the United States.

On May 30, 1980, RD delivered 80 pounds of marijuana to GERALD MCDONALD.

On June 2, 1980, in Riverside, California, GREG SPEROW and DF met with the pilot and planned the smuggling of marijuana from Colombia, South America, into the United States. SPEROW stated that his partner, GERALD MCDONALD, was expecting a boat and that SPEROW would take over the boat after it was unloaded.

On June 5, 1980, in Los Angeles, California, GREG SPEROW used a pay telephone to arrange a meeting between the pilot and GERALD MCDONALD. SPEROW, MCDONALD, and two of the Colombian sources of supply then met the pilot at a resort in Brea, California, and discussed the smuggling of marijuana from Colombia, South America into the United States.

On June 12, 1980, in or near Los Angeles, California, GREG SPEROW gave approximately \$15,000 in currency to the pilot and backup pilot in order to repair the DC-3 and purchase aviation fuel in Mexico and elsewhere.

On June 24, 1980, GREG SPEROW met the backup pilot at the El Monte airport and introduced him to a Colombian man who would be on board the DC-3 to direct the pilots to the landing site in Colombia.

On June 25, 1980, GREG SPEROW informed the pilot that he was picking up an electronic detection device for the DC-3 airplane, to be used to locate a transponder or law enforcement tracking device. Later that day, SPEROW delivered this device (a Panoramic Surveillance Receiver) to the pilot and backup pilot. The device had been purchased for \$18,000.

On June 27, 1980, the vessel PROSEA II arrived in San Francisco Bay with its cargo of three tons of marijuana.

On June 28, 1980, GREG SPEROW requested the pilot and backup pilot to fly the DC-3 airplane out over the Pacific Ocean and attempt to locate a vessel containing a load of Colombian marijuana. On this same day, SPEROW met with the pilots at the Riverside airport where the three boarded and flew the DC-3 over the San Bernardino County desert area to view proposed clandestine off-loading sites for the 6,000 pounds of marijuana and 200 kilos of cocaine.

On July 2, 1980, GREG SPEROW telephoned one of the undercover operatives and informed him that the boat load of marijuana had been unloaded and distributed, and that one of the Colombians had returned to Colombia to arrange for the smuggling of the cocaine and marijuana.

On July 3, 1980, GERALD MCDONALD informed others that the marijuana from the vessel PROSEA II had been transported to Southern California.

On July 3, 1980, in Claremont, California, GREG SPEROW gave \$10,000 in currency to the pilot to pay taxes and insurance on the DC-3.

On July 7, 1980, in Los Angeles, California, GREG SPEROW met with the pilot and informed him that the pilot would be transporting \$500,000 to Colombia aboard the DC-3.

On July 7, 1980, in Los Angeles, California, GREG SPEROW met with the pilot and delivered a hand-held, two-way radio in order for the pilot to communicate with the load crew boss at the off-loading site.

On July 11, 1980, GREG SPEROW applied for a United States passport in the name of Dennis Sparkman.

On July 13, 1980, GERALD MCDONALD met with others to discuss the division of profits from the sales of the marijuana smuggled aboard the PROSEA II.

On July 19, 1980, GERALD MCDONALD and the pilot met the Colombian sources of supply at the Los Angeles International Airport where the Colombians boarded a plane to Colombia.

On July 20-21, 1980, in Colombia, two of the Colombian sources of supply and the pilot flew over several clandestine airstrips, including the one to be used. One of the Colombians recruited the pilot to smuggle drugs for \$800,000 a year. The pilot was told that there was 200,000 pounds of marijuana ready for shipment. The pilot was shown 18 fifty-five gallon barrels of white powder which the Colombian identified as cocaine. The Colombian sources counted one million dollars in U.S. currency which had been smuggled from the United States to Colombia as payment for drugs.

On July 25, 1980, GREG SPEROW and two of SPEROW's off-loading crew members, Fred and John, met with the pilots and traveled to Warner Springs, California to look at the primary landing and off-loading site for the marijuana and cocaine. John told the backup pilot that he had hired a security crew of six men, all ex-military Special Forces members, who would be dressed in complete military uniforms and carrying automatic weapons who would "dig in" at the Warner Springs airstrip approximately 48 hours before the arrival of the DC-3.

On July 26, 1980, GERALD MCDONALD transported \$100,000 cash in a BMW automobile, Oregon license DNF 269, to Riverside, California where GREG SPEROW gave the cash to the pilot in a brown paper bag. SPEROW also gave the pilot a small hand-held, two-way radio unit for ground-air communication when the DC-3 arrived at the off-loading site. SPEROW also gave the pilot the Panoramic Surveillance Receiver.

On August 7, 1980, in Los Angeles, GREG SPEROW, GERALD MCDONALD, and one of the Colombian sources of supply met with the pilot to discuss the smuggling of marijuana into the United States. MCDONALD drove there in a Mercedes Benz, Oregon personalized plate "BONAIR."

On August 9, 1980, KENT JONES, HAROLD BALLENGER, RN, and DJ were involved in the manufacture of approximately 98 marijuana plants in Douglas, County Oregon. The grow site contained black water pipe, green water hoses, pruning shears, a 12 volt water pump and a 12 volt battery. Prior to the seizure of the marijuana plants, officers heard BALLENGER call out "Kent" and "Ray."

On August 11, 1980, GREG SPEROW telephoned the pilot in Riverside, California and requested that he obtain a large semi-trailer and conveyor belt to be used to off-load marijuana.

On August 13, 1980, GREG SPEROW called the pilot and requested that he fly to Colombia on August 14 to look at a new airstrip.

On August 14, 1980, GREG SPEROW and two of the Colombians met with the pilot at the Los Angeles airport where the Colombians boarded a plane to Colombia.

On August 15, 1980, in Colombia, four of the Colombians met with the pilot regarding the marijuana, cocaine, and the proposed landing strips.

On August 21, 1980, GREG SPEROW met with the backup pilot in Claremont, California and gave him \$18,000 cash to purchase a new engine for the DC-3.

On August 22 and 25, 1980, GREG SPEROW called the pilot to make arrangements for semi-trailer which was needed on August 26, 1980.

On August 27, 1980, GREG SPEROW met with the pilots and gave them \$10,000 in currency to pay the mechanics for the installation of the new DC-3 engine.

On August 30, 1980, in Riverside, California, GREG SPEROW met with the pilots and gave them \$7,000 in currency to purchase fuel for the DC-3's flight to Colombia. SPEROW told the pilots that he wanted them to fly to Texas and then to Colombia on September 1, 1980 because the DC-3 marijuana load had to be transported from Colombia to the United States before the boat load of marijuana arrived "up north."

On September 2, 1980, in Los Angeles, GREG SPEROW met with another undercover person (Mike) at SPEROW's residence located at 1433 Mount Pleasant, Los Angeles, California, where SPEROW took delivery of the semi-trailer.

On September 8, 1980, GREG SPEROW instructed Mike to fly to Oakland, California to meet a man who would have the semi-trailer with a sign attached bearing the name "Crippled Children's Foundation." GERALD MCDONALD then took Mike to Fisherman's Wharf where MCDONALD informed him that they were bringing into San Francisco a boat containing 40,000 pounds of marijuana, after which the DC-3 load of marijuana would be flown from Colombia

into the United States. The semi-trailer, with a "Crippled Children's Society of America" sign, was parked at Pier 26.

On September 9, 1980, GREG SPEROW called the pilot and requested that the pilot obtain four hand-held, two-way radios on a common frequency to be used to assist in the security operation during the off-loading of the boat in San Francisco.

On September 10-11, 1980, the vessel Valkyure, containing 40,000 pounds of marijuana, and bearing a sign containing the name "Crippled Children's Society of America," arrived at Pier 26, San Francisco, California where bails of marijuana were off-loaded into the semi-trailer.

On September 18, 1980, GREG SPEROW and GERALD MCDONALD were indicted in the Southern District of California on drug smuggling and trafficking charges. SPEROW was arraigned on September 26, 1980.

In December 1980, RD and others, aboard the vessel RANSOM, departed Newport Beach, California, bound for Colombia, South America, to obtain a load of marijuana.

On January 8, 1981, GREG SPEROW began a 21-day jury trial. On February 4, 1981, SPEROW pled guilty to Count 3 but the trial on the remaining counts continued. SPEROW was convicted on the remaining counts on February 18, 1981.

In January and February 1981, aboard the RANSOM, RD obtained two tons of marijuana in Colombia, South America and sailed it to California where it was off-loaded and taken to RD's residence in San Juan Capistrano, California.

On March 3, 1981, in South Laguna, California, RD and MARK ALDERS discussed the distribution of the marijuana which had just arrived aboard the RANSOM. RD also delivered 10 pounds of marijuana to MARK ALDERS.

On March 20, 1981, at RD's residence in San Juan Capistrano, RD delivered 100 pounds of marijuana to MARK ALDERS.

On March 23, 1981, GREG SPEROW was sentenced to 15 years in prison in the San Diego case.

In late March 1981, at Cost Mesa, California, GERALD MCDONALD paid RD \$30,000 in cash to RD as partial payment from the sale of marijuana smuggled with the RANSOM.

On April 24, 1981, RD and RC drove from San Juan Capistrano, California to Oregon and delivered approximately 1,000 pounds of marijuana to KENT JONES.

In late June 1981, at Pomona, California, MARK ALDERS paid \$110,000 in currency to DD as partial payment from the sale of marijuana smuggled with the RANSOM.

On August 7, 1981, GERALD MCDONALD was arrested and arraigned on the drug smuggling and trafficking indictment filed on September 18, 1980 in San Diego, California.

On October 2, 1981, at Carlsbad, California, KM, at the direction of RD, rented a U-Haul trailer to transport marijuana from Carlsbad to Medford, Oregon.

On November 20, 1981, GREG SPEROW's New Mexico parole was revoked.

On October 24, 1981, at the direction of RD, DD and KM transported 300 pounds of marijuana to KENT JONES in Medford, Oregon. JONES provided \$30,000 as partial payment for marijuana previously delivered to him by RD and RC.

On December 3, 1981, GERALD MCDONALD pled guilty to Counts 3 and 4 of the San Diego indictment. He was sentenced on February 16, 1982 to 5 years in federal prison.

On May 16, 1982, MS and NS manufactured 431 marijuana plants in Douglas County, Oregon.

In July 1982, KENT JONES had numerous telephone conversations with RN and HAROLD BALLENGER.

During October to December 1982, KENT JONES had numerous telephone conversations with DB, RN and HAROLD BALLENGER.

During January to September 3, 1983, KENT JONES had numerous telephone conversations with DB and RN.

On April 28, 1983, KENT JONES, MARK ALDERS, RD and others were indicted in the Southern District of California on drug smuggling and trafficking charges.

On September 3, 1983, KENT JONES was arrested on the San Diego charges in Roseburg, Oregon.

On February 1, 1984, GREG SPEROW's sentence in the San Diego case was reduced to 10 years.

In 1984, DENNIS HAMMONS started a business called the "Indoor Gardener" in Talent, Oregon, in order to assist and supply marijuana growers.

On April 3, 1984, KENT JONES pled guilty to an Information in San Diego charging him with possession of marijuana with the intent to distribute.

On May 17, 1984, in Tiller, Oregon, MR manufactured and possessed with the intent to distribute 29 marijuana plants.

On May 31, 1984, KENT JONES and Attorney A turned in approximately 200 pounds of marijuana to a United States Customs agent, which was supposed to be left from the 1,000 pounds JONES received from RD and RC on April 24, 1981.

On June 4, 1984, KENT JONES was sentenced in the San Diego case to five years probation.

On July 28, 1985, MS and MR were in possession of marijuana growing equipment and 184 marijuana plants in Jackson County, Oregon.

On April 2, 1986, GB was stopped by law enforcement officers while he was driving HAROLD BALLENGER'S grey Toyota pickup. GB was driving in the vicinity of a marijuana grow site in the Cow Creek area of Douglas County, Oregon, near Glendale. Marijuana debris

and a triple beam scale was found in the cab of the pickup. Fertilizer buckets and a box containing perforated black plastic bags used for starting plants was found under a canopy in the bed of the pickup. The plastic bags were marked "Cave Junction Outdoor Growers Co-op."

On July 1 and 2, 1986, HAROLD BALLENGER and passengers were observed in BALLENGER'S grey Toyota pickup in the vicinity of a marijuana grow site in the Cow Creek area of Douglas County, Oregon.

On July 29, 1986, GREG SPEROW was released from prison on his San Diego case.

On August 29, 1986, HAROLD BALLENGER dropped GB off in the Cow Creek area near the marijuana grow site.

On August 31, 1986, officers observed HAROLD BALLENGER's grey Toyota pickup in the Cow Creek area. A short time later, officers observed a person carrying a large 12-volt battery toward the grow site. When officers attempted to stop the Toyota as it was leaving the area, HAROLD BALLENGER went around the police vehicle and drove away, which resulted in a chase and a forced stop of the BALLENGER vehicle. GB was the only passenger. Marijuana debris was located on the driver's side floorboard. A 114 plant marijuana grow site was discovered which contained a man-made pond, camouflage netting, compost bags, hoses, a 12-volt electric pump, black plastic starter plant bags, and a water timer.

On August 31, 1986, at the residence of HAROLD BALLENGER and TB, HAROLD BALLENGER was in possession marijuana, marijuana seeds, books on growing marijuana indoors and outdoors, drip line connectors, grow lights, a set of triple beam scales, camouflage clothing, a "Domestic Growers Supply Catalog," a heated marijuana growing room, and numerous other items used in the indoor and outdoor growing of marijuana.

On August 31, 1986, at the residence of GB, GB was in possession of marijuana, marijuana seeds, grow lights, an RV battery, plastic growing pots, electric timers, and numerous

other items used in the indoor and outdoor growing of marijuana. Following their arrests, Attorney A represented both HAROLD BALLENGER and GB and neither cooperated with law enforcement.

On March 24, 1987, GERALD MCDONALD was released from prison on the San Diego case.

On July 12, 1988, at a hotel in Coos Bay, Oregon, DENNIS HAMMONS attempted to purchase 5 kilograms of cocaine. During negotiations, HAMMONS stated that he sold 20 kilograms of cocaine every two weeks, with connections in Bend and Portland, Oregon, Colorado, Arizona, and San Jose, California. At the time of his arrest, HAMMONS was in possession of \$67,000 in currency, which was to be used as partial payment for the cocaine. HAMMONS stated that he started a business six years earlier in Talent, Oregon called "The Indoor Gardener." This business was created in order to assist and supply marijuana growers. While staying at the hotel, HAMMONS received a phone call from KENT JONES who was using the name Bill Smith.

In the fall of 1988, while GERALD MCDONALD was in prison, JMc lived in a house on Cobb Street, Roseburg, Oregon, which was owned by KENT JONES.

In January 1989, in Clarkston, Washington, LL was arrested in possession of seven pounds of marijuana with the intent to distribute.

On January 6, 1989, in Eugene, Oregon, during negotiations to deliver one ton of Mexican marijuana, RM (aka Mouseman), was in possession of 215 pounds of marijuana, an Ohaus triple beam scale, and a phone book containing phone numbers for KENT JONES and DENNIS HAMMONS.

On March 4, 1989, in Roseburg, Oregon, AB was arrested in possession of a drug ledger and one-half pound of cocaine which she had obtained from KENT JONES and MARK KITZMAN.

On July 6, 1989, Attorney A told a police officer that his name was in AB's book, but that the statute of limitations had run on anything he had done.

Between March and September 20, 1989, MARK KITZMAN sold TB and PC kilogram quantities of cocaine at a time, for a total of 10 kilograms.

On September 14, 1989, KENT JONES rented a truck from Ryder Truck Rental in Tukwila, Washington.

On September 17, 1989, KB was driving a vehicle owned by KENT JONES. The vehicle contained a gallon of Superthrive fertilizer, three jugs of distilled water, and large plastic bags. KB stated that he lived at 1033 Cobb Street, Roseburg, Oregon, which was owned by KENT JONES.

On September 20, 1989, TB was in possession of one-half pound of cocaine and firearms. TB obtained this cocaine from MARK KITZMAN.

On September 24, 1989, RN went to a marijuana grow site of 141 plants near Tiller, Oregon and harvested part of the crop. During searches of two residences used by RN, including a trailer located on the property of his parents, RN was in possession of additional harvested marijuana, an Ohaus triple beam scale, four record albums with KENT JONES' name written on them, and miscellaneous supplies and equipment used in the manufacturing of marijuana. RN was represented by Attorney A and did not cooperate with law enforcement.

On April 25, 1990, in or near Portland, Oregon, GM was in possession of approximately 50 marijuana plants, marijuana growing equipment, \$5,790 in currency, and a 9 mm semi-automatic pistol.

On April 27, 1990, in El Segundo, California, during his purchase of 30 kilograms of cocaine for approximately \$640,000, GERALD MCDONALD, using the fictitious name of Paul Bragan, told undercover detectives that he wanted an additional 10 kilograms of cocaine.

In 1991, KENT JONES agreed to purchase 2.5 tons of hashish through JF.

On January 25, 1991, GERALD MCDONALD was sentenced to 10 years in prison as a result of his conviction for possession of 30 kilograms of cocaine in El Segundo, California on April 27, 1990.

On February 24, 1991, DENNIS HAMMONS sent a letter from prison to Attorney A and asked Attorney A to tell KENT JONES that he (HAMMONS) would be furloughed on March 13-15 and would be staying at the Sheraton Hotel in Spokane, Washington.

On May 14, 1991, at the residence of WT on Devils Knob Road in Douglas County, KENT JONES, MARK KITZMAN, RN, WT and others manufactured 640 marijuana plants. At this location, a series of underground marijuana grow rooms were located. Also found: numerous items used in the growing of marijuana, triple beam scales, multiple pounds of harvested marijuana, a large number of firearms including a loaded Colt .45 semi-auto pistol located on the kitchen counter, a Colt python, a Thompson machine gun, shotguns and rifles, and over \$6,045 in currency. WT was in possession of an address book containing phone numbers for DB, MS, NS and "KJ" (KENT JONES), and a diagram of a shop on Kurtz Road, LaPine, Oregon. A subsequent search of the LaPine shop revealed a newly constructed marijuana growing room which had been built, in part, with materials purchased with the credit card of RN. The letters "KJ" appeared on the wall of this room. A subsequent search of the residence of RN in Bend, Oregon, revealed a small amount of marijuana, a Colt .38 pistol, a rifle, an envelope from Attorney A, and references or phone calls to KENT JONES, MS, WT, and TB.

On July 20, 1991, KENT JONES wired \$200 to JMc in Long Beach, California.

On August 1, 1991, BS and KB were arrested in relation to a 68 plant marijuana grow in Lane County, Oregon. Both were wearing camouflage clothing. During a search of KB's residence, the telephone number of KENT JONES was found written on the cover of a new telephone book ("K.J. 673-1902"). Following his arrest, BS called his wife and instructed her to retrieve approximately \$5,000 in currency that was hidden in the dryer, rent a hotel room at the Hilton in Eugene, and then bail him out of jail. BS subsequently stayed at the Hilton that night. BS told his wife not to worry because JONES would take care of everything as long as no one talked. BS also told his wife that Attorney A was going to represent him.

On August 1-2, 1991, the following phone calls were placed: MS to HAROLD BALLENGER, MS to MR, BS to KENT JONES, BS to Attorney A, and JONES to BS.

On September 9, 1991, MARK KITZMAN was stopped by the police in Douglas County, Oregon, for felony driving while suspended. KITZMAN fled on foot and was not apprehended. The Saab vehicle driven by KITZMAN contained camouflage clothing, a camouflage mask, plant fertilizer, gloves, and a letter postmarked February 18, 1991 from an associate of KITZMAN and JONES (HC) in Reno, Nevada, which gave instructions on how to successfully operate indoor marijuana grows. The writer of the letter also offered to sell KITZMAN marijuana growing equipment. KITZMAN's phone book contained entries for KENT JONES, HAROLD BALLENGER, MARK PURSLEY, HC in Reno, Nevada, TH, TJ, MS, and the Residence Inn in Lake Oswego, Oregon.

On October 2, 1991, KENT JONES, MARK KITZMAN, and BN were observed loading marijuana into a small pickup in Douglas County, Oregon. KITZMAN and BN were subsequently stopped by the police. Both were dressed in camouflage clothing and smelled of growing marijuana. KITZMAN had a pair of pruning shears in his pocket. On the way to jail,

KITZMAN threw his camouflaged pants out the window, but they were later recovered by the police. The pickup contained the following additional items: pruning shears, marijuana leaves, a rifle, camouflage clothing and face masks. Latent fingerprints of BN and TJ were found on items in the pickup. A subsequent search of a nearby marijuana grow site revealed 131 live or harvested marijuana plants, automatic water timers, and hoses. After the arrest of KITZMAN and BN at approximately 2:20 p.m., the following phone calls were placed on October 2nd:

3:02 p.m. RN to KENT JONES
3:30 p.m. KENT JONES was seen talking on a nearby pay phone
6:52 p.m. TJ to KENT JONES
6:56 p.m. HAROLD BALLENGER to KENT JONES
7:02 p.m. HAROLD BALLENGER to MR

On October 9, 1991, at his residence located at 1475 NW Galveston, Bend, Oregon, MARK KITZMAN was in possession of the following items relating to the manufacture and sale of marijuana: photographs of growing marijuana; marijuana; a camouflage tarp and net; a box of plastic planters; a photograph of KENT JONES, KITZMAN, MS and NS together; and a newspaper article dated July 26, 1990 regarding the arrest of a marijuana grower (TH) in Bend, Oregon (78 plants) who had KITZMAN's name in his address book at the time of his arrest.

On October 29, 1991, at approximately 12:00 noon, while officers were conducting surveillance of KENT JONES in Roseburg, Oregon, JONES began to follow a Douglas County sheriff surveillance vehicle. A short time later, at 1:43 p.m., a person using Attorney A's law firm account number, called Oregon Department of Motor Vehicles and requested registration information on the undercover sheriff vehicle, license RBD274, which JONES had been following. When the DMV employee said that the file would have to be hand searched, the caller responded "never mind" and hung up. A few minutes later, at 1:50 p.m., surveillance officers observed KENT JONES driving back and forth through the Sheriff's Office parking lot looking at parked cars. JONES then drove to Attorney A's office.

On November 24-26, 1991, KENT JONES traveled to Bend, Oregon.

On February 28, 1992, MS and NS were in possession of approximately 10 pounds of harvested marijuana, scales, camouflage clothing and face masks, and marijuana grow equipment such as pots, hoses, fertilizer, starter trays, seal-a-meal, and a book entitled "The Marijuana Growers Guide." These items were found at or near the residence of MS and NS in Roseburg, Oregon. Fingerprints of MS, HAROLD BALLENGER, and MR were found on bags containing marijuana or bags used for the purpose of packaging marijuana. On the day of the search, the following phone calls were placed:

| | |
|------------|----------------------------------|
| 9:16 a.m. | NS to BALLENGER |
| 9:48 p.m. | KENT JONES TO HAROLD BALLENGER |
| 9:58 a.m. | KENT JONES to ROBERT LONG |
| 10:00 a.m. | KENT JONES to MS |
| 10:03 a.m. | KENT JONES to MARK KITZMAN |
| 10:14 a.m. | NS to BALLENGER |
| 1:21 p.m. | KENT JONES to HAROLD BALLENGER |
| 1:29 p.m. | KENT JONES to MR |
| 1:36 p.m. | KENT JONES to HAROLD BALLENGER |
| 2:05 p.m. | Attorney A bailed NS out of jail |
| 2:12 p.m. | KENT JONES to MR |
| 2:18 p.m. | KENT JONES to MS |
| 2:40 p.m. | KENT JONES to HAROLD BALLENGER |
| 4:55 p.m. | NS to MR |
| 5:42 p.m. | NS to WT |
| 7:11 p.m. | KENT JONES to RN |

On April 21, 1992, at his residence located at 63475 Hughes Road, Bend, Oregon, HAROLD BALLENGER was in possession of marijuana, marijuana seeds, approximately \$2,900 in cash, a vacuum package machine, Ohaus triple beam scales, a large container of Miracle Grow, two compound bows (each wrapped in large green plastic garbage bags), three containers of carbon monoxide (two in green garbage bags), starter plant trays, two large fans, two wooden backpacks in a large green garbage bag, and two rifles.

On April 21, 1992, at their residence in Bend, Oregon, MR and DR were in possession of marijuana and photos of growing marijuana.

On July 7, 1992, surveillance was conducted at Johnson Wire Rope by the Douglas County Sheriff's Office. On the same day, through an account Attorney A had with Oregon Department of Motor Vehicles, Attorney A's office made an inquiry regarding the registered owner of one of the surveillance vehicles, Oregon license RBD274.

On June 14-15, 1992, KENT JONES used his credit card in Burnaby and Victoria, British Columbia.

On August 19, 1992, Attorney A's office made an inquiry regarding the ownership of the same undercover police vehicle.

On October 21, 1992, KENT JONES was driving a Ford pickup to Johnson Wire Rope. The pickup had British Columbia license plates and was registered to RB in British Columbia.

On November 4, 1992, at his residence at 300 Hidden Valley Lane, Roseburg, Oregon, KENT JONES was in possession of a note that read: "Kent, David Terry left for Portland at 4:00 here is number 760-6374 good news."

Between the dates of December 3-7, 1992, and December 11-12, 1992, KENT JONES stayed at the Residence Inn in Lake Oswego, Oregon, where JONES purchased 50-100 pounds of marijuana. When JONES registered at the hotel on December 11, he used Attorney A's credit card to make the reservation. JONES was driving Attorney A's vehicle and he listed his employment on the registration form as "Partner/Law Firm." Attorney A's credit card was also used to pay for the room.

On December 4, 1992, KENT JONES wrote a check for \$70,000 and purchased a cashier's check in that amount made payable to a San Diego defense attorney. (On July 27,

1993, the San Diego defense attorney wrote a check to KENT JONES in the amount of \$68,000).

On December 11, 1992, KENT JONES left Johnson Wire Rope and traveled to Attorney A's office.

On December 16, 1992, KENT JONES visited Attorney A's office.

On December 18, 1992, KENT JONES was served with a subpoena in regards to a homicide investigation being conducted in Roseburg, Oregon. JONES said that he was going to retain Attorney A to represent him on the matter. JMc, who had been living at a residence owned by JONES on Cobb Street, Roseburg, Oregon, was held as a material witness in that investigation with a bond of \$1,000,000. She listed her telephone number as (503) 673-1902, which was KENT JONES' home telephone number at the time.

In approximately 1993, LL was introduced to KENT JONES by RMc and/or DENNIS HAMMONS, who were working together at the time. LL immediately began obtaining multi-pound quantities of marijuana from JONES on a regular basis, which LL distributed in Washington, Idaho, North Dakota, and Kentucky. Within a year of meeting JONES, LL began purchasing in excess of 100 pound quantities of marijuana from JONES every 2-4 months. Beginning in approximately 1997, and continuing until LL's arrest in April 2002, LL purchased multi-hundred pound quantities (approx. 350 pounds) of marijuana from Jones on a monthly basis. Between December 2000 and April 2002, LL obtained loads of marijuana averaging approximately 350 pounds from JONES on approximately 16 occasions. LL often would travel from Idaho to the Vancouver, Washington or Portland, Oregon area to meet JONES and pick up marijuana. On one of these occasions, LL picked up approximately one pound of "green" marijuana at JONES's residence located at 13200 N.E. 77th Ave., Vancouver, Washington. On other occasions, LL would meet MARK KITZMAN to obtain the marijuana. In 1993,

KITZMAN brought 60-80 pounds of marijuana to LL's Idaho residence. In the spring of 2000, KITZMAN brought 100-150 pounds of marijuana to LL's residence in Clearwater, Idaho. LL transported or caused the transportation of this marijuana to GH, JR and JT, which generated approximately \$450,000 in currency per load, most of which was given to JONES.

On January 6, 1993, KENT JONES was in possession of a letter written by DENNIS HAMMONS in prison, which was sent to Attorney A on February 24, 1991. In part, HAMMONS said the following to Attorney A:

When I talk to you in a couple, would like to get Kent's number. I hope he's not got tweaked about me calling from here. Pass on that I'm taking my furlough on March 13 thru 15 and will be at the hotel around 12 noon on the 13th, under the name of JONES, that's the name of the gal that's coming up to see me, kinda funny, wouldn't you say? Any way I'll be at the Sheraton of Spokane, (509) 455-9600. I'll give you a call in a couple of weeks.
Sincerely, Bruce.

On January 6, 1993, JONES was also in possession of a Red Lion Hotel note paper containing the names of MS and HAROLD BALLENGER.

On January 20, 1993, the District Attorney handling the homicide investigation in Roseburg wrote the following in a letter to Attorney A:

This letter to confirm conversation of 1/20/92 in which you informed me that you will be present outside of the grand jury hearing room to consult with Kent Jones, as you represent him in anything related to Harvey Caron, Estella Vaughan and any past or present DINT drug investigation. Please inform me immediately if you do not represent Kent Jones.

On January 21, 1993, in a letter to the District Attorney, Attorney A wrote:

I will, in fact, be present outside of the grand jury hearing room today at 2:30 PM to consult with Mr. Jones, should he so desire. Beyond this, your letter is inaccurate.

On January 21, 1993, Attorney A represented both KENT JONES and JMc in regards to a homicide investigation in Roseburg. Prior to JMc's appearance, Attorney A called the District

Attorney's Office stating that JMc had left a message for him to call her. JMc told officers that she was not represented by Attorney A, that she did not call him, and that she did not want Attorney A or KENT JONES to know she was in town. Ultimately however, Attorney A did represent JMc before the grand jury. During this time, JMc asked Attorney A if she should contact "KJ" (JONES) regarding her bail. When an investigator asked Attorney A if KENT (JONES) was going to post JM's bail, Attorney A responded "Kent who?" When the investigator stated he knew JONES and JMc were longtime friends, Attorney A admitted that JONES and JMc knew each other but that he did not think that JONES could post the \$100,000 security bond.

In February 1993, LL wired \$2,000 to DENNIS HAMMONS in Arizona as a down payment on a load of marijuana.

On March 5, 1993, KENT JONES called LL at the Pit Stop public phone in Kamiah, Idaho.

On March 12, 1993, KENT JONES called LL in Lewiston, Idaho.

Between December 1992 and May 1993, JMc transported 100 pound quantities of marijuana from California to KENT JONES in Oregon on at least three occasions.

On March 30, 1993, KENT JONES rented a car from Budget Rent-A-Car in Portland, Oregon.

On May 5 and 6, 1993, in Sunriver, Oregon, MARK KITZMAN delivered two duffle bags of marijuana to LL near the Sunriver Lodge and Resort. LL had previously ordered the marijuana from KENT JONES by telephone and, pursuant to arrangements made by telephone, LL traveled from Idaho in order to obtain the marijuana from KITZMAN.

On June 16, 1993, BS came out of KENT JONES' residence in Vancouver, Washington, and put a package in JONES' vehicle. JONES and BS then left in that vehicle. Later that day, ROBERT LONG arrived at JONES' residence.

On June 25, 1993, MARK KITZMAN was convicted of conspiracy to manufacture and distribute marijuana relating to the marijuana grow discovered on October 29, 1991.

On August 18, 1993, while representing BN in the KITZMAN and BN marijuana manufacturing prosecution, Attorney A told a police officer the following: "I understand you think I'm the ringleader of a bunch of drug dealers and that I launder their drug money and give them legal advice on what to do if they're caught." Attorney A denied doing this.

In August 1993, GJ manufactured approximately 90 marijuana plants in the Hatchery Creek area near Logsdon, Oregon. On August 24, 1993, GJ was stopped by police near the grow site. He was dressed in camouflage clothing which smelled like growing marijuana. He was also in possession of a CB radio and camouflaged netting.

On September 8, 1993, MARK KITZMAN was sentenced to 21 months prison for conspiracy to manufacture and distribute marijuana relating to the marijuana grow discovered on October 29, 1991.

On September 14, 1993, KENT JONES called AW.

On November 3, 1993, KENT JONES called the residence at 2530 S.W. Luradel, Portland, Oregon, where a marijuana growing operation was ongoing. JONES also called a residence in Lancaster, Oregon, where another grow operation was in existence.

On January 31, 1995, DENNIS HAMMONS was in possession of approximately 57 pounds of marijuana which he was attempting to sell when he was arrested in Pinole, California. An additional 81 pounds of marijuana was subsequently found in storage units rented by HAMMONS in Medford, Oregon. At the time of his arrest, HAMMONS was in possession of

the phone number for “Bone,” a nickname of LL, who resided in Idaho. HAMMONS was also in possession of two of his own business cards for the “Five Star Ostrich Ranch” and “Greenhouses by Bruce” in Central Point, Oregon.

In June or July 1995, JR traveled to JT's residence near Bismarck, North Dakota, where JR picked up 90 kilograms of marijuana which LL had transported to North Dakota in his pickup. LL had obtained this marijuana from the KENT JONES organization. During this meeting, JR gave LL \$250,000 in currency which he owed LL from a February 1995 load. JR took the 90 kilograms of marijuana to Kentucky, where he was arrested attempting to sell 20 pounds of it to another individual on July 13, 1995. During a search, an additional 132 pounds of marijuana was recovered. Shortly thereafter, LL made arrangements with KENT JONES to pick up approximately 500 pounds of marijuana, which he obtained from an associate of JONES near The Dalles, Oregon.

On July 10, 1995, GREG SPEROW wrote a letter to an attorney in San Luis Obispo as follows: “Please accept this letter as your authorization to visit Jerry McDonald at the CMC facility in San Luis Obispo. The cost for this service, as you indicated, will be between \$200 and \$400. I will be responsible for the charges noted above.”

On July 19, 1995, DENNIS HAMMONS signed an “Application for Passport by Mail” in his real name. The passport was approved on August 9, 1995. In his application, HAMMONS gave the following information: Address of 5745 McLaughlin Drive, Central Point, Oregon. Phone number (503) 830-0989. Born in Santa Clara, California on July 22, 1947. Planned to travel to Europe for 6-12 months, leaving on October 1, 1995. Wife - Linda Hammons. Occupation - construction.

On August 10, 1995, DENNIS HAMMONS signed an “Application for Passport” in the name of his deceased brother, Robert James Hammons. The passport was approved on August

17, 1995. In the application, HAMMONS gave the following information: Address of 660 Venice Blvd, #148, Venice, California. Born in San Jose, California on March 18, 1956. Planned to travel to Europe in October for an unknown length of stay. Occupation - carpenter. HAMMONS used a false California driver's license in the name of Robert Hammons in order to obtain the passport.

On August 23 and 25, 1995, MARK KITZMAN rented cars from Alamo Rent-A-Car in San Diego, California.

In the fall of 1995, JW and JR flew from Kentucky to Idaho prior to JR being sentenced. By this point, JW had agreed to take over JR's marijuana business while JR was in prison.

On November 9, 1995, GERALD MCDONALD, while serving a prison sentence, wrote a letter to GREG SPEROW asking him to assist JMc in securing a new place to live and a car. MCDONALD gave SPEROW JMc's phone number of (310) 621-9605. MCDONALD also gave SPEROW an update on "Forest." This letter was sent to JMc. On November 16, 1995, JMc forwarded MCDONALD's letter to GREG SPEROW. In a cover letter to SPEROW, JMc stated:

Hi Gregg, Jerry mailed this to me and wanted me to mail it to you; so here it is. I don't know how you want to handle this but would you please call me and let me know: (310) 621-9605. . . .I'll explain everything when I talk to you. Thank you, Judy.

On December 18, 1995, MARK KITZMAN rented a car from Dollar Rent-A-Car in Santa Ana, California.

Between December 8, 1995 and January 6, 1996, JMc rented a car from Enterprise car rental in Long Beach, California. During that time, the car was driven 2,373 miles.

On January 7, 1996, in and around Los Angeles, California, BR purchased a 55-pound keg of ephedrine from an undercover DEA agent. (Ephedrine is used to manufacture methamphetamine.) The purchase price was \$40,000 in currency. BR drove the ephedrine to

1433 Mount Pleasant, Los Angeles, which is a residence owned by GREG SPEROW. After receiving a phone call from BR, SPEROW arrived and both of them drove to 36 North Berkely Avenue, Pasadena, California, which is another residence owned by SPEROW. The keg of ephedrine was then moved into this residence.

On January 8, 1996, GREG SPEROW and BR shipped a Knaack tool box containing 237 pounds of marijuana to Portland, Oregon, a Knaack tool box containing 343 pounds of marijuana to Cleveland, Ohio, and a Knaack tool box containing 132 pounds of marijuana to Philadelphia, Pennsylvania. Subsequently, KENT JONES contacted BS in Oregon and requested the use of his pickup. JONES told BS that the truck was needed by GREG SPEROW. BS drove his pickup to JONES' residence in Vancouver, Washington.

On January 10, 1996, SPEROW arrived at the Portland, Oregon airport and attempted to pick up the Knaack tool box containing marijuana. He was driving a 1995 Nissan pickup registered to BS. When questioned by airport authorities about the tool box, SPEROW said that he did not know what was in it. He then left the area without the marijuana. JONES subsequently called BS and told him that SPEROW had been caught at the Portland airport and that the truck had been abandoned. JONES provided directions as to the truck's location. SPEROW subsequently instructed JONES to dig up some money and give it to BS for legal fees. JONES gave BS \$10,000 in currency, which was contained in a shoe box.

On January 10-11, 1996, GREG SPEROW requested a friend to remove a shrink wrap oven, boxes, cans, and other packaging material from SPEROW's residence located at 36 N. Berkeley Avenue, Pasadena, California.

On January 16, 1996, GREG SPEROW was in possession of the following items at one of his residences located at 36 N. Berkeley Avenue, Pasadena, California: 175 pounds of

marijuana, duffel bags, packaging material, a Knaack tool box, chemicals, and a methamphetamine recipe.

On January 16, 1996, GREG SPEROW was in possession of the following items located in Storage Unit #10, Glendale U-Store, 5120 San Fernando Road, Glendale, California: a 55 pound keg of ephedrine, marijuana, cocaine, 160 pounds of sodium cyanide, shipping material, scales and duffel bags.

On January 18, 1996, MARK KITZMAN rented a car from Dollar Rent-A-Car in Newport Beach, California.

On February 1, 1996, a house owned by GREG SPEROW, located at 651 South Ventu Park, Thousand Oaks, California, contained a trap door in the closet of the master bedroom which led to an underground room which had been cleaned out. This room had been set up to manufacture methamphetamine. (On October 29, 1996, while SPEROW was a fugitive, by grant deed, SPEROW transferred this property to other persons through Attorney B.)

In approximately February 1996, after being charged in the Southern District of California for Conspiracy to Manufacture Methamphetamine and Attempted Possession of Marijuana with the intent to Distribute in the District of Oregon, GREG SPEROW became a fugitive.

Between February 7-15, 1996, JMc rented a car from Enterprise car rental in Ontario, California. During that time, the car was driven 2,403 miles.

On March 7, 1996, a letter was found during a search warrant executed at the home of GREG SPEROW's brother in Glendale, California, which discussed the "empire" of GREG SPEROW being built on his addiction. Marijuana and cocaine was also found.

On March 7, 1996, a search warrant executed at GREG SPEROW's 88-acre property located in San Luis Obispo, California, revealed evidence of a previous outdoor marijuana grow operation.

Between April 16-20, 1996, JMc rented a car from Enterprise car rental in San Clemente, California. During that time, the car was driven 2,020 miles.

Between May 23-28, 1996, JMc rented a car from Enterprise car rental in San Clemente, California. During that time, the car was driven 2,498 miles.

On June 14, 1996, KENT JONES rented a car from Hertz Rent-A-Car in Portland, Oregon.

On August 3, 1996, MARK KITZMAN rented a car from Alamo Rent-A-Car in Portland, Oregon.

Between August 5-8, 1996, JMc rented a car from Enterprise car rental in Ontario, California. During that time, the car was driven 1,885 miles.

On September 20, 1996, TJ and NB were involved in manufacturing marijuana at 4 different locations in Douglas County, Oregon, totaling 112 plants. TJ was represented by Attorney A and did not cooperate with law enforcement.

Between December 5-10, 1996, JMc rented a car from Enterprise car rental in Ontario, California. During that time, the car was driven 2,530 miles.

Between December 12-16, 1996, JMc rented a car from Enterprise car rental in Ontario, California. During that time, the car was driven 1,737 miles.

Between February 10-13, 1997, JMc rented a car from Enterprise car rental in Ontario, California. During that time, the car was driven 1,784 miles.

Between February 28 and March 3, 1997, JMc rented a car from Enterprise car rental in Ontario, California. During that time, the car was driven 1,992 miles.

On March 18 and April 22, 1997, MARK KITZMAN rented cars from Dollar Rent-A-Car in Portland, Oregon.

Between May 23 and June 2, 1997, JMc rented a car from Enterprise car rental in Ontario, California. During that time, the car was driven 1,687 miles.

Between June 9-16, 1997, JMc rented a car from Enterprise car rental in Ontario, California. During that time, the car was driven 2,691 miles.

Between June 28 and July 8, 1997, JMc rented a car from Enterprise car rental in Ontario, California. During that time, the car was driven 1,735 miles.

Between July 29 and August 16, 1997, GERALD MCDONALD rented a car from Enterprise car rental in Santa Ana, California. During that time, the car was driven 4,988 miles.

On July 21, August 22, September 21, and October 29, 1997, MARK KITZMAN rented cars from Alamo Rent-A-Car in Portland, Oregon.

On October 29, 1997, DAMON MARSH was in possession of one-quarter pound of marijuana.

On December 2-3, 1997, MARK KITZMAN rented cars from Thrifty Rent-A-Car in Portland, Oregon.

On February 1, 1998, MARK KITZMAN rented a car from Dollar Rent-A-Car in Los Angeles, California.

On February 21, 1998, DENNIS HAMMONS obtained a California driver's license in the name and date of birth of his deceased brother, Robert James Hammons, with an address of 660 Venice Blvd., Apartment #148, Venice, California.

Between February 25 and March 1, 1998, GERALD MCDONALD rented a car from Enterprise car rental in Irvine, California. During that time, the car was driven 1,736 miles.

Between March 4-11, 1998, GERALD MCDONALD rented a car from Enterprise car rental in Los Angeles, California. During that time, the car was driven 2,315 miles. For the rental, MCDONALD used a home address of 4917 Rangeview Avenue, Los Angeles, which is the residence of GREG SPEROW.

On November 10, 1998, MARK KITZMAN rented a car from Alamo Rent-A-Car in Newport Beach, California.

On February 1, 1999, DENNIS HAMMONS obtained a California driver's license in the fictitious name of Robert Westley. HAMMONS used a date of birth of January 22, 1950 and an address of 1927 Harbor Blvd., Apartment 134, Costa Mesa, California.

On February 13 and March 5, 1999, MARK KITZMAN rented cars from Alamo Rent-A-Car in Portland, Oregon.

On May 21, 1999, DENNIS HAMMONS, using the fictitious name of Robert Westley, traveled from Ixtapa/Zihuatanejo, Guerrero, Mexico to Los Angeles.

On June 26, 1999, DENNIS HAMMONS, using the fictitious name of Robert Hammons, traveled from Ixtapa/Zihuatanejo, Guerrero, Mexico to Los Angeles.

On July 6, 1999, MARK KITZMAN rented a car from Alamo Rent-A-Car in Portland, Oregon.

On July 13, 1999, DENNIS HAMMONS, using the fictitious name of Robert Hammons, traveled from Ixtapa/Zihuatanejo, Guerrero, Mexico to Los Angeles.

On July 19, 1999, JMc was arrested near Gooding, Idaho. She was transporting approximately 98 pounds of marijuana in black duffel bags.

On July 30, 1999, a hotel room in Twin Falls, Idaho was charged to Attorney A's credit card.

On August 8, 1999, MARK KITZMAN rented a car from Alamo Rent-A-Car in

Portland, Oregon.

On August 28, 1999, DENNIS HAMMONS, using the fictitious name of Robert Hammons, traveled from Ixtapa/Zihuatanejo, Guerrero, Mexico to Los Angeles.

On September 7, 1999, MARK ALDERS was arrested in Pomona, California after search warrants uncovered evidence of a methamphetamine manufacturing lab and a marijuana growing operation.

On September 14 and 21, 1999, MARK KITZMAN rented cars from Alamo Rent-A-Car in Portland, Oregon.

On September 17, 1999, HAROLD BALLENGER was issued a United States passport.

On September 25, 1999, DENNIS HAMMONS, using the fictitious name of Robert Hammons, traveled from Ixtapa/Zihuatanejo, Guerrero, Mexico to Los Angeles.

On October 5-8, 1999, HAROLD BALLENGER purchased 5 cashier's checks with currency, for a total of \$10,500.

On October 7, 1999, TB was issued a United States passport.

On October 8, 1999, MARK KITZMAN rented a car from National Car Rental in Latham, New York.

On October 14, 1999, KENT JONES rented a car from Enterprise Rent-A-Car in Beaverton, Oregon.

On October 27, 1999, DENNIS HAMMONS, using the fictitious name of Robert Hammons, traveled from Ixtapa/Zihuatanejo, Guerrero, Mexico to Los Angeles.

On November 3, 1999, HAROLD BALLENGER purchased nine cashier's checks with currency, for a total of \$21,000.

On November 10, 1999, HAROLD BALLENGER traveled to Guerrero, Mexico.

Between November 10-20, 1999, Attorney A's VISA card was used for purchases in Mexico.

On November 30, 1999, DENNIS HAMMONS, using the fictitious name of Robert Hammons, traveled from Ixtapa/Zihuatanejo, Guerrero, Mexico to Los Angeles.

On December 16, 1999, HAROLD BALLENGER and TB traveled to Zihuatanejo, Guerrero, Mexico.

In December 1999, HAROLD BALLENGER transported approximately 100 pounds of marijuana from Oregon to JH in Cleveland, Ohio.

Between December 22, 1999 and January 27, 2000, GERALD MCDONALD rented a vehicle in Orange County, California. For the rental, MCDONALD used a home address of 4917 Rangeview Avenue, Los Angeles, which is the residence of GREG SPEROW.

During 2000, on four separate occasions, HAROLD BALLENGER transported 80-100 pounds of marijuana from Oregon to Ohio, and delivered it to JH in Cleveland.

On January 6, 2000, DENNIS HAMMONS, using the fictitious name of Robert Hammons, traveled from Ixtapa/Zihuatanejo, Guerrero, Mexico to Los Angeles.

On January 28-30, 2000, LL stayed at the Ferryman's Inn in Vancouver, Washington. During this stay, KENT JONES brought LL a multi-hundred pound quantity of marijuana, which LL then transported to other states, including Kentucky.

On February 5, 2000, DENNIS HAMMONS, using the fictitious name of Robert Hammons, traveled from Ixtapa/Zihuatanejo, Guerrero, Mexico to Los Angeles.

On March 11, 2000, DENNIS HAMMONS, using the fictitious name of Robert Hammons, traveled from Ixtapa/Zihuatanejo, Guerrero, Mexico to Los Angeles.

On March 17, 2000, GERALD MCDONALD and RD2 were driving a Budget Rent-A-Car pickup when they were stopped by Utah Highway Patrol in Beaver County, Utah.

MCDONALD and RD2 told the police that they started in Orange County, California, and were going to their residence in Idaho Falls, Idaho (475 N. Gate Mile, Idaho Falls, phone number (208) 528-6634). The vehicle contained drug paraphernalia, including foil, a snort tube, torch, and glass pipes. The car also contained a receipt which showed that GERALD MCDONALD rented a car on December 22, 1999 in Orange County and had returned it January 27, 2000. MCDONALD'S California driver's license showed an address of 4914 Rangeview Avenue in Los Angeles, California, which is owned by GREG SPEROW.

Between March 20-27, 2000, FM rented a car from Enterprise car rental in Medford, Oregon. During that time, the car was driven 100 miles.

On March 23, 2000, ROBERT LONG purchased the Village Kitchen Restaurant from PK in Priest River, Idaho.

Between March 31 and April 6, 2000, FM rented a car from Enterprise car rental in Medford, Oregon. During that time, the car was driven 1,817 miles.

Between April 6-11, 2000, FM rented a car from Enterprise car rental in Medford, Oregon. During that time, the car was driven 1,309 miles.

On April 7, 2000, KENT JONES rented a car from Dollar Rent-A-Car in Portland, Oregon.

On April 25, 2000, DENNIS HAMMONS, using the fictitious name of Robert Hammons, traveled from Ixtapa/Zihuatanejo, Guerrero, Mexico to Los Angeles.

On May 2, 2000, KENT JONES rented a car from Dollar Rent-A-Car in Portland, Oregon.

On May 10, 2000, HAROLD BALLENGER purchased five cashier's checks for a total of \$15,000.

Between May 19-22, 2000, FM rented a car from Enterprise car rental in Medford, Oregon. During that time, the car was driven 387 miles.

Between May 24 and June 1, 2000, FM rented a car from Enterprise car rental in Medford, Oregon. During that time, the car was driven 1,280 miles.

On June 2, 2000, DENNIS HAMMONS, using the fictitious name of Robert Westley, stayed at the Hampton Inn, Bend, Oregon.

On June 15, 2000, DENNIS HAMMONS, using the fictitious name of Robert Westley, traveled from Ixtapa/Zihuatanejo, Guerrero, Mexico to Los Angeles.

On June 16, 2000, TB traveled to Guerrero, Mexico.

Between July 1-3, 2000, FM rented a car from Enterprise car rental in Medford, Oregon. During that time, the car was driven 295 miles.

On July 9, 2000, DENNIS HAMMONS, using the fictitious name of Robert Westley, stayed at the Hampton Inn, Bend, Oregon.

On July 14, 2000, KENT JONES deposited into his 1843 account a cashier's check in the amount of \$5,000 which he received from MARK KITZMAN.

On July 14, 2000, HAROLD BALLENGER traveled to Guerrero, Mexico.

Between July 14-17, 2000, FM rented a car from Enterprise car rental in Medford, Oregon. During that time, the car was driven 743 miles.

On July 24, 2000, HAROLD BALLENGER obtained a 1 year non-immigrant visa in Zihuatanejo, Guerrero, Mexico. This visa granted BALLENGER permission to enter Mexico

through the International airport in Zijuatanejo, which is in the Mexican state of Guerrero. The visa authorized the activity of “Financier”, with the prohibition of performing any other activities. On July 24, 2001, the authority to extend his stay in Mexico under the visa was granted until July 24, 2002.

On August 17, 2000, HAROLD BALLENGER traveled to Guerrero, Mexico.

Between August 18-21, 2000, FM rented a car from Enterprise car rental in Medford, Oregon. During that time, the car was driven 270 miles.

On August 21, 2000, GERALD MCDONALD rented a Kia Sportage automobile from Enterprise car rental in Costa Mesa, California, using a home address of 4914 Rangeview Avenue, Los Angeles, California, which is owned by GREG SPEROW.

On August 26, 2000, at approximately 6:00 p.m., GERALD MCDONALD, driving the Kia Sportage from Enterprise car rental, arrived at a location near the airport in Carlsbad, California where he met with CC who had previously arranged to sell 100 pounds of marijuana to a police informant. When MCDONALD arrived, CC met MCDONALD at the Kia vehicle where MCDONALD showed CC the marijuana, which was contained in three large duffle bags located in the rear storage area of the Kia. MCDONALD then provided CC with the keys to the Kia and a piece of paper containing numbers and weights for the packages. Both MCDONALD and CC were arrested after CC showed the marijuana to the informant. After his arrest, MCDONALD denied having any knowledge of the Kia vehicle. Following his release from custody, MCDONALD and CS took \$20,000 in currency out of a storage unit in Orange County, California, and took it to Attorney A in Roseburg, Oregon. In the presence of Attorney A, MCDONALD instructed CS to give the currency to Attorney A’s receptionist. MCDONALD and Attorney A met in Attorney A’s office while CS retrieved the currency from their vehicle and gave it to the receptionist. No receipt was given for the currency.

Between August 26 and September 9, 2000, the following phone calls occurred:

| | |
|-----------------|---------------------------------------|
| August 26, 2000 | KENT JONES to TJ |
| August 27, 2000 | KENT JONES to GJ and DAMON MARSH |
| August 29, 2000 | KENT JONES to DAMON MARSH |
| Sept 1, 2000 | KENT JONES to DAMON MARSH and RM |
| Sept 1-2, 2000 | HAROLD BALLENGER to GB and GJ |
| Sept 6-9, 2000 | HAROLD BALLENGER to GB and KENT JONES |

On August 29, 2000, DENNIS HAMMONS, using the fictitious name of Robert Westley, traveled from Ixtapa/Zihuatanejo, Guerrero, Mexico to Los Angeles.

On August 29, 2000, HAROLD BALLENGER departed Guerrero, Mexico.

On September 8, 2000, RN entered a marijuana grow site near his residence in Tiller, Oregon.

Between September 8-12, 2000, FM rented a car from Enterprise car rental in Medford, Oregon. During that time, the car was driven 1,134 miles.

On September 13, 2000, DENNIS HAMMONS attempted to get an Oregon driver's license in the fictitious name of Robert Westley, with an address of 1190 N. Ten Mile Lakes, Lakeside, Oregon, which is the resort property of KENT JONES.

On September 16-19, 2000, HAROLD BALLENGER called KENT JONES, and KENT JONES called HAROLD BALLENGER, a total of six times.

On September 23, 2000, HAROLD BALLENGER called a number in Zihuatanejo, Guerrero, Mexico ((527) 553-2816) for two minutes.

On September 25, 2000, RN was arrested for growing 29 marijuana plants near the residence of himself and his parents in Tiller, Oregon. RN was also in possession of approximately 2.5 pounds of harvested marijuana which was drying in a shed constructed on RN's parents' property. At the grow site, evidence was found of previous grows. RN said that his father had warned him to stay away from the grow because the father had observed

helicopters in the area. RN was represented by Attorney A and another privately retained attorney and did not cooperate with law enforcement.

On September 26, 2000, DENNIS HAMMONS, using the fictitious name of Robert Westley, traveled from Ixtapa/Zihuatanejo, Guerrero, Mexico to Los Angeles.

On September 30, 2000, HAROLD BALLENGER called KENT JONES.

Between October 4-5, 2000, FM rented a car from Enterprise car rental in Medford, Oregon. During that time, the car was driven 181 miles.

On October 7-9, 2000, DENNIS HAMMONS, using the fictitious name of Robert Westley, stayed at the Hampton Inn, Bend, Oregon.

On October 7-9, 2000, HAROLD BALLENGER called GB two times.

On October 9-10, 2000, DENNIS HAMMONS, RT, and JP were involved in the attempted purchase of 1,137 pounds of marijuana in Bend, Oregon. HAMMONS was using the fictitious name of Robert Westley. JP told the informant that some of the marijuana was going to customers in San Diego, California, and some was staying in Bend.

On October 10, 2000, DENNIS HAMMONS and JP took possession of a U-Haul truck containing 1,137 pounds of marijuana. At approximately 11:40 a.m., HAMMONS entered the back of the U-Haul and discovered a DEA transmitter. HAMMONS quickly left the U-Haul and drove RT to the Redmond, Oregon, airport where RT was dropped off at approximately 12:02 p.m. HAMMONS then directly drove to the residence of HAROLD BALLENGER, arriving at approximately 12:49 p.m. Within an hour, two additional vehicles arrived at the BALLENGER residence. Approximately two hours later, HAMMONS headed towards California.

On October 20, 2000, HAROLD BALLENGER called GB.

On October 23, 2000, at 8:06 a.m., HAROLD BALLENGER called a number in Nicaragua ((505) 779-6345).

On October 23, 2000, HAROLD BALLENGER called GB two times.

On October 24, 2000, DENNIS HAMMONS, using the fictitious name of Robert Westley, traveled from Ixtapa/Zihuatanejo, Guerrero, Mexico to Los Angeles.

On October 27, 2000, at 10:12 a.m. and 2:56 p.m., HAROLD BALLENGER called a number in Costa Rica ((506) 643-3231) for a total of 27 minutes.

Between October 28 and November 4, 2000, FM rented a car from Enterprise car rental in Medford, Oregon. During that time, the car was driven 993 miles.

On October 29-30, 2000, HAROLD BALLENGER called GB three times.

On November 1-3, 2000, HAROLD BALLENGER called numbers in Costa Rica five times, for a total of 45 minutes.

On November 14-15, 2000, HAROLD BALLENGER called GB three times.

On November 16 and 18, 2000, HAROLD BALLENGER called KENT JONES two times.

On November 24, 2000, KENT JONES called PO.

On November 24, 2000, HAROLD BALLENGER called GB three times.

On December 4, 2000, HAROLD BALLENGER called a number in Costa Rica ((506) 282-2276) for 22 minutes.

Between December 3-17, 2000, DENNIS HAMMONS, using the fictitious names of Robert West and John Smith, called HAROLD BALLENGER eight times.

Between December 17-21, 2000, Attorney A's VISA card was used for purchases in Mexico.

On December 18, 2000, DENNIS HAMMONS, using the fictitious name of Robert Westley, traveled from the United States to Mexico.

On December 21-22, 2000, GH stayed at Ferryman's Inn, Vancouver, Washington. During this time, KENT JONES brought GH several hundred pounds of marijuana, which GH subsequently transported to JR and JW in Kentucky.

Between December 22-23, 2000, HAROLD BALLENGER stayed at the Red Roof Inn in Strongsville, Ohio.

On December 26, 2000, at 6:24 a.m., HAROLD BALLENGER called a number in Costa Rica ((506) 643-3336) for 33 minutes.

On December 27, 2000, TB departed Guerrero, Mexico to the United States.

On January 1, 2001, GREG SPEROW, using the fictitious name of Greg Westbrook, filled out an airplane registration application for his Cessna 182 airplane, tail number N70915.

On January 5-6, 2001, HAROLD BALLENGER called RN four times and GB once.

On January 6, 2001, DENNIS HAMMONS, using the fictitious name of Robert Westley, traveled from Ixtapa/Zihuatanejo, Guerrero, Mexico to Los Angeles, California. During a customs inspection of HAMMONS, his girlfriend, and his two sons, HAMMONS gave an address of JONES' Lakeside resort property. HAMMONS claimed that he did not know his social security number and provided a birth certificate for Robert Westley.

On January 7, 2001, the following phones calls were made:

| | |
|------------|--|
| 2:00 a.m. | DENNIS HAMMONS (Robert West) to BALLENGER |
| 7:44 a.m. | HAROLD BALLENGER to GB |
| 8:59 a.m. | DENNIS HAMMONS (Robert West) to BALLENGER |
| 10:06 a.m. | HAROLD BALLENGER to GB |
| 11:00 a.m. | DENNIS HAMMONS (Robert West) to BALLENGER |
| 3:43 p.m. | HAROLD BALLENGER to RN |
| 5:39 p.m. | HAROLD BALLENGER to MR |
| 5:59 p.m. | HAROLD BALLENGER to DENNIS HAMMONS (Robert West) |

On January 8, 2001, HAROLD BALLENGER called CJ.

On January 9, 2001, HAROLD BALLENGER called RN.

On January 11, 2001, CJ called HAROLD BALLENGER.

On January 13 and 14, 2001, DENNIS HAMMONS, using the fictitious name of Robert West, called HAROLD BALLENGER.

On January 15, 2001, CJ called HAROLD BALLENGER.

On January 16, 2001, between 9:53 a.m. and 9:57 a.m., DENNIS HAMMONS, using the fictitious name of Robert West, called HAROLD BALLENGER four times.

On January 16, 2001, at 10:08 a.m., KENT JONES called HAROLD BALLENGER.

On January 16, 2001, at 11:38 a.m., DENNIS HAMMONS, using the fictitious name of Robert West, called HAROLD BALLENGER.

On January 16, 2001, at 2:18 p.m. and 2:21 p.m., DENNIS HAMMONS, using the fictitious name of John Smith, called HAROLD BALLENGER.

On January 16, 2001, at 3:10 p.m. and 3:38 p.m., CJ called HAROLD BALLENGER.

On January 17, 2001, at 7:52 a.m. and 11:13 a.m., GB called HAROLD BALLENGER.

On January 17, 2001, at 11:47 a.m., MR called HAROLD BALLENGER.

On January 17, 2001, at 2:09 p.m. and 2:59 p.m., GB called HAROLD BALLENGER.

On January 17, 2001, at 6:18 p.m., DENNIS HAMMONS, using the fictitious name of John Smith, called HAROLD BALLENGER.

On January 17, 2001, at 7:04 p.m., GB called HAROLD BALLENGER.

On January 18, 2001, DENNIS HAMMONS, using the fictitious name of Robert Westley, stayed at the Hampton Inn, Bend, Oregon. While there, HAMMONS received two phone calls from HAROLD BALLENGER.

On January 18, 2001, at 9:48 a.m., HAROLD BALLENGER called MR

On January 18, 2001, at 11:23 a.m., HAROLD BALLENGER called RN

On January 18, 2001, at 1:37 a.m., HAROLD BALLENGER called MR

On January 19, 2001, at 9:02 a.m., HAROLD BALLENGER called MR

On January 19, 2001, at 11:09 a.m., HAROLD BALLENGER called GB

On January 19, 2001, between 12:29 p.m. and 12:31 p.m., HAROLD BALLENGER called DENNIS HAMMONS (John Smith) three times.

On January 19-21, 2001, GH stayed at Ferryman's Inn, Vancouver, Washington. During this time, KENT JONES brought GH 300 pounds of marijuana, which GH subsequently transported to JR and JW in Kentucky.

On January 20, 2001, HAROLD BALLENGER called RN two times.

On January 21, 2001, DENNIS HAMMONS, using the fictitious names of John Smith, called HAROLD BALLENGER.

On January 22-27, 2001, HAROLD BALLENGER called RN eight times.

Between January 22-31, 2001, FM rented a car from Enterprise car rental in Medford, Oregon. During that time, the car was driven 1,321 miles.

On January 28, 2001, FM wired \$200 from Medford, Oregon to GERALD MCDONALD in Long Beach, California.

On February 1, 2001, HAROLD BALLENGER wrote a check in the amount of \$400 to Attorney A for "fingerprints."

Between the dates of February 9-11, 2001, GH stayed at the Ferryman's Inn, Vancouver, Washington. During this time, KENT JONES brought GH 300 pounds of marijuana, which GH subsequently transported to Kentucky.

On February 19, 2001, HAROLD BALLENGER departed the Guerrero, Mexico airport for the United States.

On February 21-25, 2001, DENNIS HAMMONS, using the fictitious names of Robert West and John Smith, called HAROLD BALLENGER eight times.

On February 25, 2001, GERALD MCDONALD wired \$100 from Hemet, California, to RD2 in Idaho Falls, Idaho.

On February 26-27, 2001, GH stayed at Ferryman's Inn, Vancouver, Washington. During this time, KENT JONES brought GH several hundred pounds of marijuana, which GH subsequently transported to JR and JW in Kentucky.

On February 27, 2001, DENNIS HAMMONS, using the fictitious name of Robert West, called HAROLD BALLENGER two times.

On February 27-28, 2001, HAROLD BALLENGER purchased four cashier's checks for a total of \$10,700.

Between February 26 and March 6, 2001, GERALD MCDONALD rented a car from Enterprise car rental in Long Beach, California. During that time, the car was driven 2,503 miles.

On March 3, 2001, DENNIS HAMMONS, using the fictitious name of John Smith, called HAROLD BALLENGER.

On March 8-12, 2001, KENT JONES stayed at Bally's/Paris in Las Vegas, Nevada, where he established an "active cash player" account. On March 8th, JONES had a cash buy-in of \$13,800.

On March 8, 2001, at approximately 5:33 a.m., DENNIS HAMMONS, using the fictitious name of Robert West, called KENT JONES in Las Vegas, Nevada.

On March 8, 2001, at approximately 5:40 a.m., DENNIS HAMMONS, using the fictitious name of Robert West, called GREG SPEROW.

On March 11, 2001, DENNIS HAMMONS, using the fictitious name of Robert West, called HAROLD BALLENGER.

On March 15, 2001, HAROLD BALLENGER stayed at the Red Roof Inn in Strongsville, Ohio.

Between March 22 and April 4, 2001, GERALD MCDONALD rented a car from Enterprise car rental in Long Beach, California. During that time, the car was driven 2,062 miles.

Between March 31 and April 2, 2001, DENNIS HAMMONS, using the fictitious name of Robert West, called HAROLD BALLENGER five times.

On April 9, 2001, TJ, Attorney A, JEROD KEYSER and others met at a restaurant in Roseburg, Oregon.

On April 18, 2001, GERALD MCDONALD was transferred to the East Mesa Detention facility in San Diego. Between May 1 and September 21, 2001, there were over 60 calls made by MCDONALD to JONES.

Between April 18-19, 2001, FM rented a car from Enterprise car rental in Medford, Oregon and drove it 44 miles.

On April 19-26, 2001, HAROLD BALLENGER called DENNIS HAMMONS (Robert West) six times.

On April 26, 2001, DENNIS HAMMONS, using the fictitious name of Robert West, called HAROLD BALLENGER two times.

Between April 30 to May 12, 2001, FM rented a car from Enterprise car rental in Grants Pass, Oregon. During that time, the car was driven 4,555 miles.

On May 1, 2001, GERALD MCDONALD, calling from the East Mesa Detention facility in San Diego, California, called KENT JONES.

On May 1, 2001, DENNIS HAMMONS, using the fictitious name of Robert Smith, called HAROLD BALLENGER.

On May 2, 2001, KENT JONES called the Village Kitchen Restaurant in Priest River, Idaho.

On May 4, 2001, FM stayed at Ferryman's Inn, Vancouver, Washington.

On May 8, 2001, DENNIS HAMMONS, using the fictitious name of Robert West, called HAROLD BALLENGER.

Between May 12-14, 2001, HAROLD BALLENGER stayed at the Red Roof Inn in Strongsville, Ohio.

Between May 22-29, 2001, FM rented a car from Enterprise car rental in Ashland, Oregon. During that time, the car was driven 1,750 miles.

Between May 23-31, 2001, GERALD MCDONALD, calling from the East Mesa Detention facility in San Diego, California, called KENT JONES eight times.

On May 29-30, 2001, GH stayed at Ferryman's Inn, Vancouver, Washington. During this time, KENT JONES brought GH 300 pounds of marijuana, which GH subsequently transported to JR and JW in Kentucky.

On May 31, 2001, KENT JONES called JEROD KEYSER in Priest River, Idaho.

In the summer of 2001, LL began sending GH to pick up marijuana from KENT JONES and his associates. GH would then transport the marijuana to Kentucky and bring money back to LL and JONES.

On June 4, 2001, GERALD MCDONALD, calling from the East Mesa Detention facility in San Diego, California, called KENT JONES.

On June 8, 2001, DENNIS HAMMONS, using the fictitious name of Robert West, called HAROLD BALLENGER.

Between June 11-12, 2001, GERALD MCDONALD, calling from the East Mesa Detention facility in San Diego, California, called KENT JONES eight times.

Between June 12-16, 2001, FM rented a car from Enterprise car rental in Medford, Oregon. During that time, the car was driven 1,370 miles.

Between June 20-22, 2001, FM rented a car from Enterprise car rental in Medford, Oregon. During that time, the car was driven 474 miles.

Between June 27-28, 2001, GERALD MCDONALD, calling from the East Mesa Detention facility in San Diego, California, called KENT JONES two times.

On June 30, 2001, HAROLD BALLENGER and TB traveled to Guerrero, Mexico.

Between July 10-18, 2001, GERALD MCDONALD, calling from the East Mesa Detention facility in San Diego, California, called KENT JONES six times.

Between July 13-19, 2001, FM rented a car from Enterprise car rental in Medford, Oregon. During that time, the car was driven 955 miles.

On July 21, 2001, RD2 was arrested in possession of marijuana and methamphetamine during a visit to see GERALD MCDONALD at the East Mesa Detention Facility in San Diego, California.

On July 24, 2001, HAROLD BALLENGER's Mexican visa was extended until July 24, 2002.

Between July 24-27, 2001, GERALD MCDONALD, calling from the East Mesa Detention facility in San Diego, California, called KENT JONES seven times.

Between July 25-27, 2001, FM rented a car from Enterprise car rental in Medford, Oregon. During that time, the car was driven 154 miles. A subsequent search of the car was positive for the presence of methamphetamine and cocaine.

On July 27, 2001, MARK KITZMAN rented a car from Hertz Rent-A-Car in Los Angeles, California.

On July 28, 2001, at approximately 9:47 a.m., in the District of Idaho, LL used a pay telephone at the Pit Stop in Kamiah, Idaho to call KENT JONES' pager.

On August 1, 2001, RN plead guilty to manufacturing marijuana on September 25, 2000 in Douglas County, Oregon. He was represented by Attorney A and another privately retained attorney. RN did not cooperate with authorities.

Between August 1-3, 2001, GERALD MCDONALD, calling from the East Mesa Detention facility in San Diego, California, called KENT JONES two times.

On August 7, 2001, DENNIS HAMMONS and RT were arrested on warrants out of Texas in connection with their attempt to smuggle approximately 1,137 pounds of marijuana from Texas to Bend, Oregon, which occurred on October 9-10, 2000. At the time of his arrest, HAMMONS was driving a vehicle registered in the fictitious name of Robert Westley. He was also in possession of marijuana and an address book which contained a nickname and partial phone number for LL in Idaho.

On August 8, 2001, GERALD MCDONALD, calling from the East Mesa Detention facility in San Diego, California, called KENT JONES two times.

Between August 13-23, 2001, GERALD MCDONALD, calling from the East Mesa Detention facility in San Diego, California, called KENT JONES ten times.

On August 18, 2001, HAROLD BALLENGER and TB traveled to Guerrero, Mexico.

On August 27-29, 2001, GH stayed at Ferryman's Inn, Vancouver, Washington. During this time, KENT JONES brought GH 300 pounds of marijuana, which GH subsequently transported to JR and JW in Kentucky.

In the fall of 2001, LL in Idaho telephoned KENT JONES and made arrangements for RH to pick up 5-10 pounds of marijuana. RH subsequently met JONES at the Half Time Tavern in Vancouver, Washington where JONES delivered marijuana to RH.

Between September 1-24, 2001, GERALD MCDONALD, calling from the East Mesa Detention facility in San Diego, California, called KENT JONES ten times.

On October 5, 2001, KENT JONES telephoned JEROD KEYSER and PK in Priest River, Idaho.

On October 6, 2001, KENT JONES telephoned the Village Kitchen in Priest River, Idaho.

On October 17-18, 2001, KENT JONES telephoned JEROD KEYSER in Priest River, Idaho.

Beginning in late 2001, MARK KITZMAN, KENT JONES and AW started a marijuana grow in the residence at 4325 S.W. Pomona Street, Portland, Oregon. AW acquired grow lights and other hardware. MARK KITZMAN and EB set up the grow in the basement of the property. The starter plants for the grow were provided by KENT JONES. Marijuana was grown at the Pomona Street location for two years, and the harvested marijuana went to KENT JONES. PO picked up some of the marijuana for KENT JONES.

On October 27, 2001, GJ wired \$500 from Tigard, Oregon, to GERALD MCDONALD in Newport, California.

On November 3, 2001, KENT JONES wired \$500 to GERALD MCDONALD in Costa Mesa, California.

On November 12, 2001, GERALD MCDONALD wired \$100 from Costa Mesa, California to RD2 in Costa Mesa, California.

On November 13, 2001, GERALD MCDONALD wired \$100 from Medford, Oregon to RD2 in Costa Mesa, California.

On November 18, 2001, KENT JONES telephoned (208) 488-0138 (AK) in Priest River, Idaho.

On November 26, 2001, GREG SPEROW, using the fictitious name of Gregory Neil Westbrook, applied for a new pilot's medical certificate.

In December 2001, HAROLD BALLENGER called JH in Cleveland, Ohio and asked if he still wanted to purchase marijuana. An agreement was made that GB would begin delivering the marijuana to Ohio.

On December 7, 2001, MARK KITZMAN rented a car from Avis Rent-A-Car in Redmond, Oregon.

On December 23, 2001, GERALD MCDONALD telephoned Attorney A using the same number that GREG SPEROW used on July 16, 2004 in order to have his property sent to Attorney A after his arrest.

Between December 31, 2001 and January 2002, HAROLD BALLENGER called a number in Mexico ((527) 553-5535) three times, and a numbers in Costa Rica ((506) 643-2021, (506) 390-4043, (506) 643-1753, and (506) 643-2841) six times, for a total of 38 minutes.

Beginning in January 2002, GB began delivering 80-100 pound quantities of marijuana to JH in Cleveland, Ohio.

Between January and July 2002, HAROLD BALLENGER purchased over \$21,000 in money orders and bank checks.

In 2002, GH and JR agreed to purchase LL's marijuana business for \$200,000. As a result, LL gave GH a pager number for KENT JONES.

On January 27, 2002, HAROLD BALLENGER traveled to Guerrero, Mexico.

On January 31, 2002, GERALD MCDONALD wired \$125 from Portland, Oregon to JMc in Eugene, Oregon.

In April 2002, GH picked up a suitcase of currency from JR in Kentucky. GH then traveled to Boise, Idaho and then to LL's residence near Clearwater, Idaho, where he dropped off

approximately \$350,000 to LL. GH then traveled to Vancouver, Washington where he picked up approximately 300 pounds of marijuana from KENT JONES. GH then traveled back to LL's residence in Idaho where he dropped off four pounds of marijuana. GH then transported the remaining marijuana to this last load from KENT JONES, transported it to Kentucky, and delivered it to JR and JW.

On April 21, 2002, GH used a pay phone in Kentucky to call the pager of KENT JONES.

On April 27, 2002, KENT JONES called (208) 448-0238 AK in Priest River, Idaho.

On April 30, 2002, LL was in possession of over four pounds of marijuana which he had obtained from KENT JONES through GH. LL was also in possession of approximately \$1.4 million in currency, which was buried in the ground around his cabin. This money was the proceeds of marijuana sales involving drugs obtained from KENT JONES, MARK KITZMAN and their associates.

On May 24, 2002, HI and JR were in possession of approximately 90 pounds of marijuana which had been obtained from KENT JONES through LL and GH. They were also in possession of approximately \$111,000 in currency. The 90 pounds was part of a 300-400 pound load delivered by GH in April 2002.

In June 2002, GB was told by JH in Cleveland, Ohio, not to make any more deliveries of marijuana to him because JH thought the police were watching him. GB said he was coming with a load anyway because he had another customer in the area.

On June 18, 2002, GB rented a storage unit near Mason City, Iowa.

On June 23, 2002, JH met GB in Room 352 of the Raddison Inn located in Middleburg Heights, Ohio, where JH gave GB \$70,000 and a Harley Davidson motorcycle worth \$18,000 for a previous load of marijuana that GB had delivered approximately 45 days earlier. On June 25, 2002, GB was arrested at the Raddison after a bag containing \$70,000 was found in the parking

lot. GB was in possession of marijuana, an additional \$64,064 in currency, and a rental contract for a storage unit in Mason City, Iowa.

On June 25, 2002, at a storage unit in Mason City, Iowa, GB was in possession of marijuana, a Costa Rican driver's license, Western Union wire transfer receipts, and marijuana growing equipment.

On July 30, 2002, HAROLD BALLENGER and TB were in possession of marijuana, approximately \$18,300 in currency, a drug ledger which documented a total of 184 pounds of marijuana, a check written to Attorney A in the amount of \$400 for "fingerprints," a letter from GB talking about his recent arrest in Ohio, and an address book containing phone numbers for Costa Rica, KENT JONES, GB, DAMON MARSH, DJ, ROBERT LONG, MR, MS and Attorney A. \$16,300 of the currency was located in a backpack on the floor of the master bedroom.

On August 1, 2002, in Kentucky, JR was in possession of approximately \$178,919 in currency, which was the proceeds of marijuana sales involving drugs obtained from KENT JONES.

On August 1, 2002, HAROLD BALLENGER purchased three cashier's checks for a total of \$10,500.

On August 6, 2002, FM wired \$1,000 from Medford, Oregon, to GERALD MCDONALD in Costa Mesa, California.

On August 12, 2002, FM wired \$1,200 from Canyonville, Oregon, to Jack Murphy (aka GERALD MCDONALD) in Costa Mesa, California.

On August 28-29, 2002, ROBERT LONG stayed at Ferryman's Inn, Vancouver, Washington.

In the summer of 2002, KENT JONES, MARK KITZMAN and AW discussed acquiring another house in which to grow marijuana. KENT JONES and MARK KITZMAN provided AW with money, including \$30,000 in currency to use for a down payment, with the understanding that they would obtain marijuana harvested from the house. The group decided to purchase an existing house located on Marlin Drive in Aloha, Oregon, for the purpose of growing marijuana in the basement.

In the summer and fall of 2002, RN operated two marijuana grows near his residence in Tiller, Oregon.

On August 29, 2002, HAROLD BALLENGER traveled to Guerrero, Mexico.

On September 1, 2002, HAROLD BALLENGER traveled to KENT JONES' Lakeside resort property.

On September 3-4, 2002, HAROLD BALLENGER called a number in Costa Rica ((506) 282-2276) two times.

On September 24, 2002, RN manufactured and was in possession of 55 marijuana plants near his residence in Tiller, Oregon. (Grow #1)

On October 4, 2002, RN manufactured and was in possession of 71 marijuana plants near his residence in Tiller, Oregon. (Grow # 2).

On October 4 and 8, 2002, at his residence located in Tiller, Oregon, RN was in possession of numerous items consistent with evidence found in grows 1 and 2, including a backpack with marijuana residue, a High Times magazine, PVC pipe, planter boxes, camouflage clothing, and numerous items containing marijuana residue. RN was represented by Attorney A and did not cooperate with law enforcement. On August 15, 2003, RN pled guilty and sentenced to 20 days in jail.

On October 7, 2002, KENT JONES bailed DAMON MARSH out of jail after his arrest for possession of marijuana.

On October 10, 2002, at RN's other residence in Bend, Oregon, RN was in possession of numerous items consistent with evidence found in grows 1 and 2, including an electronic water timer, green spray paint, marijuana residue and drug records.

On November 22, 2002, RD2 was in possession of heroin and paperwork related to the rental of storage units in Roberts, Idaho and Vancouver, Washington.

On November 23, 2002, a girlfriend of KENT JONES wired \$900 to FM in Medford, Oregon.

In 2002 and 2003, the residence at 4325 Pomona Street, Portland, was used by MARK KITZMAN to store duffel bags of marijuana brought from other locations.

On January 6, 2003, GERALD MCDONALD called Attorney A in Roseburg, Oregon.

On January 19, 2003, KENT JONES called GJ.

On January 20, 2003, KENT JONES called PK and the Village Kitchen in Priest River, Idaho, and JM in Oregon.

On February 27, 2003, RN plead guilty to manufacturing marijuana in October 2002. He was represented by Attorney A and another privately retained attorney. RN did not cooperate with law enforcement.

Between March 15-16, 2003, BN traveled from Colorado to San Diego, California, to pick up approximately 200 pounds of marijuana.

On March 15, 2003, KENT JONES called MARK KITZMAN.

Between March 16-21, 2003, BN traveled from San Diego, California, to Council Bluffs, Iowa, where he was arrested in possession of approximately 200 pounds of marijuana. During

the stop, a police officer checked Nelson's pulse on his neck, showing a heart rate of 132 beats per minute. (See conversation of MARK KITZMAN and AW on January 27, 2005.)

On March 22, 2003, Attorney A used his credit card to pay \$8,400 as a non-refundable fee of \$3,400 and collateral (\$5,000) on BN's \$30,000 bond in Iowa.

On March 23, 2003, KENT JONES called BN.

On March 29, 2003, KENT JONES called HAROLD BALLENGER 9 times and RN one time.

On April 3, 2003, KENT JONES called DAMON MARSH.

On April 4, 2003, KENT JONES called AW.

In May or June 2003, KENT JONES, PK, TK, and JEROD KEYSER met at the subdivision property located at Raptor View Estates in Priest River. JONES told PK that he would "leave it in the garbage can under the kitchen sink." After JONES left, TK stated that JONES was referring to \$25,000 to \$35,000.

On May 15, 2003, GREG SPEROW flew his Cessna C206 aircraft from Concord, California, to Oceanside, California, and then to Van Nuys, California.

Between May 16 and July 6, 2003, GREG SPEROW made the following flights in his Cessna C206 aircraft:

| | |
|---------------|---|
| May 16, 2003 | Van Nuys to Concord, California |
| May 17, 2003 | Concord, California to Lakeside, Oregon |
| May 18, 2003 | Lakeside, Oregon to Bend, Oregon to Concord, California |
| May 24, 2003 | Concord, California to Bend, Oregon |
| May 26, 2003 | Bend, Oregon to Lakeside, Oregon to Concord, California |
| June 28, 2003 | Concord to Oceanside, California |
| June 29, 2003 | Oceanside to Concord, California |
| July 2, 2003 | Concord to Cameron Park, California to Concord |
| July 4, 2003 | Concord, California, to Lakeside, Oregon |
| July 6, 2003 | Lakeside, Oregon, to Concord, California |

During the 4th of July holiday, 2003, a number of KENT JONES' associates arrived at the Lakeside resort property. Vehicles belonging to MS, CR, RG, CJ, EJ, DK, TJ, FM, and HAROLD BALLENGER were observed.

On July 12, 2003, PO traveled to the residence of KENT JONES in Vancouver, Washington.

On July 14 and 15, 2003, DAMON MARSH traveled to the residence of KENT JONES in Vancouver, Washington.

On July 17, 2003, DAMON MARSH traveled to the Lakeside resort property where a U-Haul trailer rented by EJ was located.

On July 20, 2003, JEROD KEYSER, having traveled from Idaho, went to the residence of KENT JONES in Vancouver, Washington.

On July 22, 2003, PO traveled to the residence of KENT JONES in Vancouver, Washington.

On July 24, 2003, PK spoke to undercover detectives regarding the sale of waterfront lots in the Rapture View subdivision at Priest River, Idaho, and admitted that a friend from Portland owned some of the lots.

Between July 25 and August 29, 2003, GREG SPEROW made the following flights in his Cessna C206 aircraft:

| | |
|-----------------|---|
| July 25, 2003 | Concord to Oceanside, California |
| July 26, 2003 | Oceanside to Tuscon, Arizona to Oceanside to Van Nuys, California |
| July 27, 2003 | Van Nuys to Concord, California |
| August 1, 2003 | Concord, California, to Lakeside, Oregon |
| August 3, 2003 | Lakeside, Oregon, to Concord, California |
| August 22, 2003 | Concord to Oceanside, California |
| August 23, 2003 | Oceanside to Van Nuys, California |
| August 24, 2003 | Van Nuys to Concord, California |
| August 26, 2003 | Concord to Oceanside to Fullerton to Van Nuys, California |
| August 29, 2003 | Concord, California, to Lakeside, Oregon to Concord |

On August 29, 2003, the bail bond company for BN in Iowa issued a refund check made payable to Attorney A in the amount of \$5,000.

On August 29, 2003, several people visiting JONES' Lakeside resort property got out of their cars and looked at a hidden law enforcement surveillance camera which had been discovered.

On September 3, 2003, a girlfriend of JONES (GL), wired \$500 from Portland to GERALD MCDONALD in Costa Mesa, California.

On September 18, 2003, KENT JONES called RN.

On October 7, 2003, PK called an emergency meeting about IRS subpoenas for his bank account.

On October 11, 2003, JMc wired \$100 from Medford, Oregon to GERALD MCDONALD in Newport Beach, California.

On October 13, 2003, JMc wired \$160 from Medford, Oregon to GERALD MCDONALD in Newport Beach, California.

On November 7, 2003, JMc wired \$200 from Medford, Oregon to GERALD MCDONALD in Costa Mesa, California.

On November 30, 2003, KENT JONES, using the fictitious name of Patrick N. Linder, initiated a prepaid cell telephone, (503) 804-9148. JONES gave this phone number to RH, a person who JONES hired to obtain fraudulent passports and other false identification for JONES, HAROLD BALLENGER, MARK ALDERS, TH and other associates.

On December 13, 2003, SJ wired \$300 from Vancouver, Washington to GERALD MCDONALD in Laguna Beach, California.

On December 14, 2003, MARK ALDERS was driving a Ford pickup registered to DAMON MARSH.

On December 17, 2003, DC, using phone number 925 381-9477, called GREG SPEROW's pager number (888) 341-1178.

On or about December 19, 2003, KENT JONES, MARK KITZMAN, AW, EB, and their associates, manufactured, and possessed with intent to distribute, approximately 115 marijuana plants at the Pomona Street location, Portland, Oregon; drugs seized at the residence also included a number of zip-lock baggies filled with marijuana and contained inside a duffle bag, together with approximately six pounds of dried marijuana.

On or about December 30, 2003, KENT JONES, MARK KITZMAN, AW, PO, RP, JM, and their associates, manufactured and possessed with intent to distribute approximately eight pounds of marijuana at the residence located at 12660 SW Hall Blvd., Tigard, Oregon.

On or about December 30, 2003, KENT JONES, MARK KITZMAN, AW, JM, PO and their associates manufactured and possessed with the intent to distribute approximately 42 marijuana plants at 19800 SW Marlin Drive, Aloha, Oregon.

On or about December 30, 2003, KENT JONES, MARK KITZMAN, AW, PO, MR1 and their associates manufactured, and possessed with the intent to distribute approximately 50 marijuana plants at 12227 SW Lesser Road, Portland, Oregon.

On December 31, 2003, AW told MR1 not to talk to the police and that AW would help MR1 get an attorney.

On one of the last few days of December 2003 or first few days of January, 2004, AW told RP that he would pay for a lawyer for him and to "shut up."

In January 2004, KENT JONES provided a cell phone and currency to RH for the purpose of obtaining false identification for JONES, HAROLD BALLENGER, MARK ALDERS, TH, and others.

On January 5, 2004, AW spoke with RP on the phone and set up a meeting at a restaurant in Tigard, Oregon. At approximately 11:00 a.m., AW met with RP and JM to discuss the recent search warrants. They met inside RP's vehicle and AW talked to them about getting them an attorney, stating that he thought it would cost about \$7,000 to retain an attorney, but stating that they should use the same attorney. He left the vehicle for a few minutes to use a pay-phone to "talk to a guy" that could "help [him] out." He then returned with a name and phone number of an attorney for them to call, and also provided the name of "his attorney," who is Attorney A identified in this Indictment as "Attorney A." AW also said they needed to keep things "isolated" to prevent a conspiracy prosecution in federal court.

On January 5, 2004, after the meeting with RP and JM, AW met with PO, to discuss the recent search warrants.

On January 5, 2004, after the meeting with PO, AW met with KENT JONES at the Mazatlan Restaurant, Tigard, Oregon, to discuss the recent search warrants.

On January 5, 2004, AW told MR1 to call an attorney that had been recommended by AW's attorney (Attorney A).

On January 9, 2004, AW told RP not to get a "rat lawyer," meaning an attorney who would tell RP to cooperate with the police.

On January 12, 2004, JMc wired \$700 from Medford, Oregon to GERALD MCDONALD in Costa Mesa, California.

On January 13, 2004, AW met with RP and DA to discuss the recent search warrants. AW told them that someone was going to give them money to pay for their attorneys. AW told RP and DA not to talk about the "group," and that if AW did not "go down" there would be an additional \$4,000 for each of them.

On January 13, 2004, AW gave RP \$3,000 in currency and instructed him to keep \$1,000 and give \$1,000 each to JM and DA.

On January 15, 2004, AW met with RP and talked about a person who might have tipped off the police about their grow operations. AW expressed concern about federal charges.

On January 22, 2004, AW met with RP and talked about getting more money to RP and others involved.

On January 22, 2004, PO was in possession of approximately three pounds of marijuana contained in oven bags. The marijuana and bags were contained in U-Haul boxes. The marijuana was found in PO's Chevy Tahoe, which he was driving at the time.

On January 22, 2004, at a residence located at 7225 S.W. Capital Hwy., Portland, Oregon, PO was in possession of oven bags, U-Haul boxes, marijuana residue, and items used in the manufacturing of marijuana, including chemicals, hosing, venting tubes, grow lights, hoods and fans.

On January 22, 2004, at his residence located at 20503 N.E. 22nd Avenue, Ridgefield, Washington, PO was in possession of a wedding invitation for Eric Jones on August 2, 2003, which wedding occurred at KENT JONES' lake property on that date.

On January 22, 2004, at storage unit #523, located at Hazel Dell Storage in Vancouver, Washington, PO was in possession of items used in the manufacturing of marijuana, including pots, ballasts, hoods, a scale, packaging material and a marijuana growers book.

On January 23, 2004, AW provided RP with \$15,000 in currency, to be divided evenly between RP, JM, and DA. This money was given to AW by KENT JONES.

On January 27, 2004, AW provided MR1 with \$1,200 in currency to assist with legal fees.

On January 28, 2004, GJ traveled to the residence of KENT JONES in Vancouver, Washington.

On February 2, 2004, GJ sold a 2002 Chevrolet Avalanche to MARK ALDERS for \$10,000.

On February 19 and 22, 2004, KENT JONES wired amounts of money to RH in various parts of the country as part of a scheme to obtain false identification and passports for himself, HAROLD BALLENGER, MARK KITZMAN, TH, and others. In so doing, JONES used a number of prepaid cell phone number and fictitious names, such as Kent Kurtz, Tom Barnet, Patrick Linder, as follows:

February 19, 2004 KENT JONES wired \$100 to RH in Salem, Oregon. JONES used a telephone number of (503) 804-9148, which is a prepaid cell phone purchased by JONES using the fictitious name of Patrick Linder.

February 22, 2004 KENT JONES, using the fictitious name of Tom Barnet, wired \$1,500 from Vacaville, California, to RH in Seattle, Washington. JONES used a telephone number of (503) 804-9148, which is a prepaid cell phone purchased by JONES using the fictitious name of Patrick Linder.

On March 17, 2004, AW met with RP and discussed possible federal charges against them, RP's appearance before a grand jury, and other ways to keep AW out of trouble with the police.

On March 29, 2004, MARK ALDERS is at JONES' lake property driving his Chevy Avalanche.

On March 30, 2004, MR traveled from Ixtapa/Zihuatanejo, Guerrero, Mexico to Los Angeles.

On April 6, 2004, on his way to Mexico from Bend, Oregon, MR was in possession of \$21,000 in currency which was packaged in shrink wrap plastic, rubber bands, and duct tape.

Some of the currency was found in two duffel bags. Other duct taped money was found in his underwear. When MR was asked why he carried so much money he said that it was from his deceased mother's estate. When asked how much of it came from the estate, MR did not know and said some of it was from MR's business in Bend, Oregon (where HAROLD BALLENGER worked). MR said he was going to Mexico to live for the next six months and to assist a family in building a house so he needed the currency. MR was questioned about the packaging of the money and MR explained he did this for safety reasons. The money had been wrapped in \$5,000, \$4,000, \$4,950 and \$5,000 increments. MR was carrying \$2,050 in his wallet and \$38 was folded and separated in his wallet. When MR was given a second chance at explaining why he carried so much currency, he stated that he was as visiting a person in Guerrero, Mexico (location of Ixtapa/Zihuatanejo). MR could not provide a telephone number or address for this person.

On April 7, 2004, MR traveled from Portland, Oregon to Los Angeles.

On April 17, 2004, MR traveled from Los Angeles to Ixtapa/Zihuatanejo, Guerrero, Mexico.

On April 20, 2004, KENT JONES traveled to GJ's residence in Woodburn, Oregon.

On April 27, 2004, KENT JONES, using the fictitious name of Tom Barnet, wired \$600 from Portland, Oregon, to GERALD MCDONALD in Medford, Oregon. JONES used a telephone number of (503) 804-9148, which is a prepaid cell phone purchased by JONES using the fictitious name of Patrick Linder

On April 27, 2004, GREG SPEROW, using the fictitious name of Greg Westbrook, presented a construction proposal for 135 Crane Terrace, Orinda, California, in a public hearing.

On April 30, 2004, GREG SPEROW called DALE BARKER in Evergreen, Colorado.

On May 11, 2004, GREG SPEROW called DALE BARKER in Evergreen, Colorado.

On May 12, 2004, MARK ALDERS wired \$200 from Post Falls, Idaho to Council Bluffs, Iowa.

On May 13, 2004, MR crossed the border at Nogales, Arizona.

On May 13, 2004, KENT JONES was at GJ's residence in Woodburn, Oregon. While JONES was there, JOSI's pickup was backed half way into the pole barn behind the residence, with the overhead door pulled down over the bed of the pickup.

On May 26, 2004, at approximately 10:00 a.m., GREG SPEROW was arrested near Orinda, California on charges relating to his 1996 shipment of 237 pounds of marijuana to Portland, Oregon. SPEROW was arrested at the residence of DC. At the time of his arrest, he was in possession of numerous items of false identification in the name of Greg Westbrook. SPEROW's address book contained phone numbers for KENT JONES (Honcho), HAROLD BALLENGER, DALE BARKER, BB, and other people.

On May 26, 2004, at approximately 11:14 a.m., DC called SPEROW's pager.

On May 26, 2004, at the Max Air airplane hanger at the Van Nuys, California, airport, GREG SPEROW was in possession of a Cessna 182 aircraft, 20 duffel bags, maps and travel guides for Mexico and Canada, a computer, a Taser stun gun, a book entitled "How to Disappear," and a Chevy Tahoe.

On May 26, 2004, GREG SPEROW telephoned BB and JC from jail and instructed them to go to a hanger located at the Concord, California airport, and remove his restored 1933 Ford Coupe and store it at another location. BB and JC then traveled to the hanger to remove the Ford Coupe. When confronted by law enforcement officers inside the hanger, BB was in possession of keys to the hanger and SPEROW's Cessna C206 airplane, which was located in the hanger along with SPEROW's pilot's log and the 1933 Ford Coupe which contained approximately two pounds of packaged marijuana in the trunk.

On May 27, 2004, GREG SPEROW's hotel room at the Hillside Inn and Suites in Lafayette, California, contained \$37,800 in currency, a telephone book showing **two** numbers for Honcho (KENT JONES), false identification (including a false birth certificate) in the name of Greg Westbrook, a drug ledger showing approximately 1,347 pounds (611 kilograms) of marijuana and payments of over \$500,000, a black duffel bag containing trace amounts of marijuana, and numerous financial documents including 3 uncashed checks written by DC to New Tech Construction as follows: June 15, 2002 for \$15,000, July 15, 2002 for \$20,000, and August 15, 2002 for \$15,000. A handwritten net worth statement was also found in SPEROW's New Tech Construction ledgers, which totaled over \$10 million, including "cash reserves" of \$1.7 million.

On June 15, 2004, KENT JONES gave RH an additional \$1,000 in order to obtain false identification for JONES, HAROLD BALLENGER, MARK ALDERS, TH, and others.

On June 20, 2004, KENT JONES gave RH an additional \$1,000 in order to obtain false identification for JONES, HAROLD BALLENGER, MARK ALDERS, TH, and others.

On June 25, 2004, KENT JONES had two telephone conversations with RH about drugs and RH's attempts to obtain false identification for JONES and his associates.

Between July 2-6, 2004, MARK ALDERS, MS, and ROBERT LONG traveled to the lake property.

On July 12, 2004, TH traveled to MARK KITZMAN's house in Bend, Oregon where he met with KITZMAN.

On July 16, 2004, as GREG SPEROW was being transported by U.S. Marshals from Seattle, Washington to Portland, Oregon, SPEROW provided a deputy Marshal with Attorney A's name, office address and phone number and requested that his property be sent to Attorney A.

On July 20, 2004. HAROLD BALLENGER and TB were indicted for drug conspiracy and money laundering in Eugene, Oregon.

On July 22, 2004, KENT JONES deposited a cashier's check for \$6,500 into his bank account which came from Mike Silva.

On July 27 and 29, and August 5, 6 and 10, 2004, KENT JONES had telephone conversations with RH about drugs and obtaining false identification, including false Social Security documents and passports for JONES, KITZMAN, BALLENGER, TH and other associates. During one of these conversations, JONES said that he wanted to talk to his attorney about a new federal law that imposed a prison term for what they were doing.

On August 5, 2004, Attorney A called the attorneys for GREG SPEROW and HAROLD BALLENGER.

On August 8, 2004, WT traveled to the Lakeside resort property.

On August 12-13, 2004, Attorney A called the attorney for GREG SPEROW and HAROLD BALLENGER (twice).

On August 23, 2004, at 11:02 a.m., Attorney A called the defense attorney for HAROLD BALLENGER. At 11:59 a.m. and 1:53 p.m, Attorney A called KENT JONES.

On August 24, 2004, MR traveled from Los Angeles to Zijuatanejo, Guerrero, Mexico.

On August 31, 2004, Attorney A called the defense attorneys for GREG SPEROW, HAROLD BALLENGER, and AW within a 15 minute time period.

On September 7, 2004, Attorney A called the defense attorney for AW.

On September 8, 2004, at 7:55 a.m., 8:42 a.m., 10:42 a.m., and 2:25 p.m., Attorney A called the defense attorney for HAROLD BALLENGER. At 3:01 p.m., Attorney A called the defense attorney for GREG SPEROW.

On September 9-10, 2004, Attorney A called the defense attorney for HAROLD BALLENGER two times.

On September 14, 2004, Attorney A called KENT JONES.

On September 19, 2004, MR traveled from Ixtapa/Zihuatanejo, Guerrero, Mexico to Los Angeles.

On September 21, 2004, between 8:11 a.m. and 9:50 a.m., Attorney A called the defense attorneys for HAROLD BALLENGER and GREG SPEROW. At 9:52 a.m., Attorney A called KENT JONES.

On September 21, 2004, while he was serving a prison sentence at FCI Sheridan, Oregon, DENNIS HAMMONS signed an "Application for U.S. Passport by Mail" using his true name. This passport was approved on September 28, 2005. In his application, HAMMONS gave the following information: Address of 21 Willamette Avenue, Medford, Oregon. Born in Santa Clara, California on July 22, 1947. Home telephone number (541) 779-5722. Business telephone number (541) 858-2563. Occupation - construction. Planned to travel in January 2005.

On September 22, 2004, at 10:14 a.m. and 10:21 a.m., Attorney A called the defense attorneys for GREG SPEROW and HAROLD BALLENGER.

On September 22, 2004, at 11:40 a.m., MARK KITZMAN met with AW near Portland, Oregon.

On September 23, 2004, KENT JONES traveled to Oceanside, California where GERALD MCDONALD lived.

On September 23, 2004, Attorney A called the defense attorney for HAROLD BALLENGER.

On September 29, 2004, AW traveled to the residence of MARK KITZMAN.

On September 30, 2004, MARK KITZMAN and AW met at a bar in Lake Oswego, Oregon.

On October 3, 2004, at 2:43 p.m, Attorney A called KENT JONES. At 2:59 p.m., Attorney A called the defense attorney for HAROLD BALLENGER.

On October 4, 2004, Attorney A called KENT JONES.

On October 5, 2004, Attorney A called the defense attorney for GREG SPEROW.

Between the dates of October 7 and October 15, 2004, MARK ALDERS traveled through the following cities: Hood River, Oregon; Drummond, Montana; Deadwood, South Dakota; Chicago, Illinois; Youngstown, Ohio; Detroit, Michigan; Clinton, New York; Boston, Massachusetts; Cleveland, Ohio; Milwaukee, Wisconsin; North Mankato, Minnesota; Billings, Montana, and Portland, Oregon.

On October 11, 2004, Attorney A called the defense attorney for GREG SPEROW.

On October 12, 2004, Attorney A called the defense attorney for HAROLD BALLENGER.

On October 13-14, 2004, KENT JONES called MARK PURLSEY four times and DAMON MARSH one time.

On October 14, 2004, at 10:17 p.m., KENT JONES called the cell phone number of MARK ALDERS. On this date, ALDERS traveled from Billings and Miles City, Montana, through Idaho, to Moses Lake, Washington, arriving in Portland, Oregon at approximately 3:00 a.m. on October 15.

On the following dates, these phone calls were made:

| | |
|------------------|--|
| October 15, 2004 | PO to KENT JONES |
| October 19, 2004 | Attorney A to the defense attorney for BALLENGER |
| October 19, 2004 | KENT JONES to Infinity Finance and PK in Idaho |
| October 20, 2004 | PO to KENT JONES. |
| October 20, 2004 | Attorney A to the defense attorney for BALLENGER |

| | |
|------------------|--|
| October 21, 2004 | Attorney A to the defense attorney for BALLENGER |
| October 21, 2004 | KENT JONES to JEROD KEYSER |
| October 22, 2004 | PO to KENT JONES |
| October 22, 2004 | Attorney A to the defense attorney for BALLENGER |
| October 23, 2004 | CR to KENT JONES |
| October 26, 2004 | MARK KITZMAN to KENT JONES. |
| October 26, 2004 | Attorney A to the defense attorney for SPEROW |
| October 26, 2004 | PO to KENT JONES |
| October 28, 2004 | DAMON MARSH and PO to KENT JONES |
| October 28, 2004 | Attorney A called KENT JONES |

Between October 29 and November 4, 2004, HAROLD BALLENGER and TM structured \$50,000 in currency deposits in the name of Cascade Auto Transport.

On the following dates, these phone calls were made:

| | |
|----------------------|--|
| October 29, 2004 | PO to KENT JONES |
| October 29, 2004 | MARK PURSLEY to KENT JONES |
| October 30, 2004 | CR to KENT JONES |
| October 30, 2004 | DAMON MARSH to KENT JONES |
| October 31, 2004 | DAMON MARSH to KENT JONES |
| November 1, 2004 | KENT JONES to JARED KEYSER AND PK |
| November 1, 2004 | Attorney A to the defense attorney for SPEROW |
| November 2-9, 2004 | GJ to KENT JONES one time, MARK PURSLEY to JONES four times, CR to JONES one time, and JEROD KEYSER to JONES one time. |
| November 9-11, 2004 | Attorney A to the phone number of MARK KITZMAN's wife three times. |
| November 10-16, 2004 | MARK PURSLEY to KENT JONES two times and CR to JONES one time. |
| November 16-17, 2004 | Attorney A to the defense attorney for BALLENGER three times. |
| November 22-24, 2004 | Attorney A to the defense attorney for BALLENGER four times. |
| November 29-30, 2004 | MARK PURSLEY to KENT JONES, JONES to GJ, MARK PURSLEY, and JEROD KEYSER. |

On December 1, 2004, KENT JONES and RM (aka "Mouseman") traveled together to the Elmer's restaurant in Woodburn, Oregon. JONES went across the street and used a pay phone, then traveled to another location where he made additional phone calls from a pay phone. During these calls, JONES made statements such as: "things are all fucked up," "how many

miles was that?,” “everything is low,” and “it’s important that you answer the phone, try to get ahold of Richard.”

On December 1, 2004, KENT JONES called PK and GJ.

On December 2-3, 2004, KENT JONES called MARK PURSLEY two times, GJ once, and CR once.

On December 4, 2004, DENNIS HAMMONS was released from federal prison in Sheridan, Oregon.

On December 6, 2004, Attorney A called the defense attorney for HAROLD BALLENGER two times.

On December 8-9, 2004, Attorney A called KENT JONES two times.

On December 13, 2004, Attorney A called the defense attorney for HAROLD BALLENGER.

On December 17, 2004, MARK ALDERS backed his Chevy Avalanche up to GJ’s pole barn in Woodburn, Oregon. ALDERS went into the pole barn and returned carrying a red duffel bag. ALDERS then left the residence.

On December 20, 2004, GJ carried two duffel bags into the pole barn at his residence.

On December 31, 2004, and January 1, 2005, MARK ALDERS called KENT JONES.

On January 3, 2005, at approximately 1:53 p.m., KENT JONES backed his Lexus up to GJ’s pole barn in Woodburn, Oregon. The pole barn door was then opened. At 2:06 p.m., JONES left the residence. At 3:10 p.m., ROBERT LONG backed his Chevy Avalanche up to the pole barn. LONG left at 3:32 p.m. At 3:34 p.m., JONES returned to JOSI’s residence and backed his Lexus up to the open pole barn. JONES left at 3:52 p.m.

On January 10, 2005, AW was arrested for his involvement in growing marijuana with KENT JONES, MARK KITZMAN and others.

On January 11, 2005, GERALD MCDONALD crossed the U.S./Mexican border at San Ysidro, California.

On January 12 and 18, 2005, Attorney A called the defense attorney for HAROLD BALLENGER.

On January 19, 2005, MARK KITZMAN met with AW and discussed the conviction of BN from Colorado, JEROD KEYSER, KENT JONES, and real estate investments.

On January 24, 2005, Attorney A called the defense attorney for HAROLD BALLENGER.

On January 25, 2005, the following phones calls were made:

| | |
|------------|--|
| 10:30 a.m. | Attorney A to the defense attorney for BALLENGER |
| 10:36 a.m. | Attorney A to the defense attorney for BALLENGER |
| 11:49 a.m. | GJ to KENT JONES |
| 11:52 a.m. | GJ to KENT JONES |
| 1:37 p.m. | GJ to KENT JONES |
| 3:03 p.m. | MARK KITZMAN to MARK PURSLEY |
| 3:06 p.m. | DAMON MARSH to MARK PURSLEY |
| 3:36 p.m. | defense attorney for BALLENGER to Attorney A |
| 4:39 p.m. | GJ to KENT JONES. |
| 6:02 p.m. | CJ to KENT JONES |
| 8:58 p.m. | GJ to KENT JONES |

10:18 p.m., on January 25, 2005, ROBERT LONG checked into the Comfort Suites Motel in Portland, Oregon. He departed the next morning at 9:28 a.m.

On January 26, 2005, the following phones calls were made:

| | |
|------------|---|
| 10:26 a.m. | KENT JONES to MARK ALDERS |
| 10:53 a.m. | defense attorney for BALLENGER to Attorney A |
| 11:13 a.m. | Attorney A to the defense attorney for BALLENGER |
| 12:34 p.m. | MARK PURSLEY to DAMON MARSH |
| 12:57 p.m. | KENT JONES to JEROD KEYSER in Priest River, Idaho |
| 1:00 p.m. | KENT JONES to PK in Priest River, Idaho |
| 1:36 p.m. | KENT JONES to MARK PURSLEY |
| 1:42 p.m. | KENT JONES to MS |
| 2:09 p.m. | Attorney A to KENT JONES |
| 2:19 p.m. | Attorney A to the defense attorney for BALLENGER |
| 6:27 p.m. | KENT JONES to PK in Priest River, Idaho |

7:44 p.m. MARK PURSLEY to DAMON MARSH
7:58 p.m. MARK PURSLEY to DAMON MARSH
8:23 p.m. MARK PURSLEY to DAMON MARSH
8:49 p.m. MARK PURSLEY to DAMON MARSH
11:00 p.m. MARK PURSLEY to DAMON MARSH

On January 27, 2005, at 8:46 a.m., GJ called MS.

On January 27, 2005, between 11:24 a.m. and 3:42 p.m., KENT JONES and ROBERT LONG went to GJ's residence in Woodburn, Oregon, where they went in and out of the pole barn.

On January 27, 2005, at 12:15 p.m., KENT JONES called MS.

On January 27, 2005, at 12:56 p.m., DAMON MARSH called MARK PURSLEY.

On January 27, 2005, at approximately 1:08 p.m., MARK KITZMAN called AW from a pay phone in Portland, Oregon and made arrangements to meet AW at a restaurant. At 1:54 p.m., GJ called KENT JONES. At 3:07 p.m., DAMON MARSH called MARK PURSLEY. At approximately 3:10 p.m., MARK KITZMAN met with AW and discussed the following: KITZMAN has had very little contact with KENT JONES lately. KITZMAN had talked to EB about EB's brother getting arrested, possible warrants for AW, the fact that JONES doesn't want to be around AW because he thinks the police are watching AW, doctoring up false employment papers for KITZMAN, and the status of BN from Colorado who received probation because the police officer who stopped BN reached into the car and checked BN's pulse on his neck. KITZMAN told AW that he couldn't be with KENT JONES on his birthday, which was coming up (January 29). KITZMAN asked AW if PO had "beat his thing" and if "everyone is holding up." During the conversation, KITZMAN showed AW his cell phone and said that it was equipped with a 911 chip that allowed the police to find people. At approximately 3:45 p.m., the meeting ended. KITZMAN went to a pay phone at the restaurant and was overheard saying that "he (AW) would like to get together for dinner sometime" and that "he seemed pretty shaky, but

he seems ok.” During the time the KITZMAN/AW meeting was going on, the following calls were made:

| | |
|------------|--|
| 3:16 p.m. | MARK PURSLEY to DAMON MARSH |
| 3:21 p.m. | MARK PURSLEY to KENT JONES |
| 3:42 p.m. | MARK PURSLEY to KENT JONES |
| 3:48 p.m. | CJ to KENT JONES |
| 6:50 p.m. | DAMON MARSH to MARK PURSELY |
| 7:01 p.m. | MARK PURSELY to MARK KITZMAN |
| 7:13 p.m. | MARK PURSELY to MARK KITZMAN |
| 7:37 p.m. | MARK PURSELY to MARK KITZMAN |
| 8:03 p.m. | MARK PURSELY to MARK KITZMAN |
| 8:11 p.m. | MARK PURSLEY to DAMON MARSH |
| 8:16 p.m. | MARK PURSLEY to DAMON MARSH |
| 9:16 p.m. | MARK PURSLEY to KENT JONES |
| 9:29 p.m. | MARK PURSLEY to KENT JONES |
| 9:50 p.m. | MARK PURSLEY to KENT JONES |
| 10:07 p.m. | MARK PURSLEY to KENT JONES |
| 11:52 p.m. | KENT JONES to MARK PURSLEY |
| 11:54 p.m. | MARK PURSLEY to the phone of MARK KITZMAN’s wife |

On January 28, 2005, the following phones calls were made:

| | |
|------------|---|
| 8:23 a.m. | MARK PURSLEY to KENT JONES |
| 10:53 a.m. | KENT JONES to MARK ALDERS |
| 12:17 p.m. | DAMON MARSH to MARK PURSLEY |
| 12:24 p.m. | DAMON MARSH to MARK PURSLEY |
| 12:28 p.m. | MARK PURSLEY to DAMON MARSH |
| 12:57 p.m. | MARK PURSLEY to DAMON MARSH |
| 1:17 p.m. | GJ to KENT JONES |
| 1:19 p.m. | CJ to RN |
| 1:30 p.m. | DAMON MARSH to MARK PURSLEY |
| 1:47 p.m. | Attorney A to the defense attorney for HAROLD BALLENGER |

In early February 2005, KENT JONES traveled to Priest River, Idaho to meet with JEROD KEYSER and PK about land investments.

On February 1, 2005, Attorney A called the defense attorney for HAROLD BALLENGER two times.

On February 2, 2005, at approximately 1:24 p.m, JEROD KEYSER told AW that KENT JONES was in Priest River, Idaho.

On February 3, 2005, at approximately 10:25 a.m., KENT JONES called AW from Priest River, Idaho, and told AW that he was there working on a land deal involving eleven lots. KENT JONES said that he wanted to meet AW on February 7th.

On February 3, 2005, at approximately 10:37 a.m., KENT JONES was observed at PK and TK's residence. At 11:35 a.m., KENT JONES was with PK, TK, JEROD KEYSER and AK at the Village Kitchen restaurant. At 12:22 p.m., KENT JONES and the others, including JEROD KEYSER, all went to the Infinity Finance office where they and KENT JONES met with RS.

On February 7, 2005, Attorney A called the defense attorney for HAROLD BALLENGER.

On February 8, 2005, ROBERT LONG stayed at the Comfort Suites Motel in Portland, Oregon. LONG checked in at approximately 1:45 a.m. and checked out the same day at approximately 11:54 a.m.

On February 14, 2005, KENT JONES called AW to tell him he was going to be late for a meeting.

On February 14, 2005, KENT JONES met AW at the Mazatlan restaurant in Portland, Oregon. Upon arrival at the restaurant, KENT JONES immediately looked under the table where they were sitting. KENT JONES and AW discussed KENT JONES' activities in Idaho (real estate investments, selling five lots, JEROD KEYSER, PK, real estate deals in Sandpoint, Idaho). KENT JONES told AW that the engineers in Idaho were charging him too much for their services (\$80,000) and that KENT JONES was only going to pay them \$70,000. When AW asked KENT JONES about the "Idaho thing, paperwork, feds in Idaho," KENT JONES responded "if they were going to do something they'd done it . . . I'd have to be guilty of something for them to do something."

Between February 16-25, 2005, Attorney A called KENT JONES fourteen times.

On March 8, 2005, BS testified falsely in a hearing involving GREG SPEROW regarding SPEROW's involvement with 237 pounds of marijuana which he shipped to Portland, Oregon on January 8, 1996.

Between March 16-24, 2005, KENT JONES and MARK KITZMAN both called the same bookkeeping and tax service office for a total of 6 times.

On March 24, 2005, DAMON MARSH was in possession of \$3,353 in currency.

On March 31, 2005, MARK KITZMAN made a request to his probation officer to travel to Spokane, Washington, and Priest River, Couer d'Alene, and Twin Falls, Idaho, to "look at construction sites and discuss proposals for development." KITZMAN said he would be staying at the Sleep Inn in Post Falls, Idaho, and would be meeting with JEROD KEYSER.

On April 6, 2005, MR traveled from Ixtapa/Zihuatanejo, Guerrero, Mexico to Los Angeles.

On April 7, 2005, GERALD MCDONALD crossed the US/Mexican border at San Ysidro, California.

On April 11-12, 2005, ROBERT LONG stayed at the Comfort Suites Motel in Portland, Oregon.

On April 17, 2005, GERALD MCDONALD crossed the U.S./Mexican border at San Ysidro, California.

On April 27, 2005, GERALD MCDONALD crossed the U.S./Mexican border at San Ysidro, California.

On April 30, 2005, ROBERT LONG stayed at the Comfort Suites Motel in Portland, Oregon. LONG arrived at 2:19 a.m. and left at 11:50 a.m.

On May 3, 2005, Attorney A made three deposits into his client trust account, in the amounts of \$5,000, \$9,000 and \$9,000, and requested that a currency transaction report not be filled out by the bank. Attorney A told the teller that he was going to Mexico to purchase property and that he needed to wire the money to Mexico to complete the purchase. On May 4, 2004, Attorney A made a currency withdrawal of \$26,500. On the same day, a person from Attorney A's law office brought a check with no payee written on it and requested five money orders for \$1,000 each.

On May 6, 2005, MR traveled from Los Angeles to Ixtapa/Zihuatanejo, Guerrero, Mexico.

On May 7, 2005, ROBERT LONG stayed at the Sleep Inn Motel in Portland, Oregon. He checked in at 1:00 a.m. and checked out at 10:17 a.m.

On May 30, 2005, two people carried bags out of the pole barn at the residence of GJ in Woodburn, Oregon.

On June 2, 2005, MARK KITZMAN made a request to his probation officer to travel to Newport, Washington, and Priest River, Idaho, for the purpose of "projected property development and bid to see JEROD KEYSER."

On June 22, 2005, GREG SPEROW was found guilty of attempted possession of 237 pounds of marijuana in Portland, Oregon.

On June 24, 2005, KENT JONES met Attorney A at the Mr. And Mrs. M's Restaurant and Lounge in Roseburg, Oregon. Both left in KENT JONES' Lexus vehicle.

On June 28, 2005, MARK KITZMAN traveled to GJ's residence in Woodburn, Oregon, backed his Ford Expedition into the open doorway of the pole barn, and had a conversation with GJ.

On July 9, 2005, GERALD MCDONALD and RD2 were in possession of heroin near Santa Ana, California.

On July 10, 2005, ROBERT LONG stayed at the Comfort Suites Motel in Portland, Oregon.

On July 24, 2005, MARK PURLSEY traveled to CR's residence.

On July 25, 2005, at approximately 10:02 a.m., MARK PURSLEY traveled to the residence of DAMON MARSH.

On July 28, 2005, at approximately 12:21 p.m., MARK PURSLEY traveled to the residence of KENT JONES.

On July 28, 2005, in Medford, Oregon, FM told an informant the following: they could drive to Orange County, California and pick up 20 pounds of marijuana using FM's Chevy Avalanche. More money could be made in transporting marijuana from one place than selling it. FM had to call either his dad (GERALD MCDONALD) or his uncle to "get things going again." They could go to California to get 100 pounds of marijuana for themselves and more marijuana to "transport for others". During this conversation, FM retrieved a backpack full of marijuana and showed it to the informant, stating that this is what they would be transporting.

On July 29, 2005, ROBERT LONG stayed at the Inn BZN in Bozeman, Montana.

On August 3, 2005, at approximately 6:32 p.m., MARK PURSLEY traveled to the residence of DAMON MARSH.

On August 10, 2005, DENNIS HAMMONS signed an "Application for a U.S. Passport by Mail" in the name of his deceased brother, Robert James Hammons. The passport was approved on September 12, 2005. In his application, HAMMONS gave the following information: Address of 660 Venice Blvd., Venice, California. Born in San Jose, California on March 18, 1956. Business telephone (760) 216-3748. Occupation - rancher. Planned to travel

to Mexico and Costa Rica leaving on August 30, 2005. In order to obtain this passport, HAMMONS enclosed the previous false passport that he obtained in 1995 in the name of Robert James Hammons.

On August 16, 2005, at approximately 10:00 p.m., ROBERT LONG traveled to the residence of DAMON MARSH in Portland, Oregon, and backed his Chevy Avalanche up to the open garage doors. When LONG left the residence at approximately 11:46 p.m., MARSH told him to “drive careful.” LONG then traveled directly to the Comfort Suites Motel in Portland, Oregon, where he checked in at approximately 12:12 a.m. (August 17th). At 1:35 a.m., approximately 200 pounds of marijuana was located in LONG’s pickup. The marijuana was packaged in 18 bricks. LONG was also in possession of drug ledgers, a cell phone, and numerous prepaid phone cards. LONG told the police that he would not be a “rat” and working as an informant would not be an option.

On August 22, 2005, MARK ALDERS was driving his Chevy Avalanche near Florence, Oregon, which had the front passenger seat and dashboard missing.

On August 25, 2005, an anonymous letter was sent from Portland, Oregon, to Attorney A, warning him that federal indictments were imminent against Attorney A, KENT JONES, and others. Specifically, the letter said:

Please listen, and listen closely, we have a mutual friend in law enforcement who has access to information concerning the on going investigation against you, KENT JONES, and many others in his organization. Federal indictments are imminent against you all. To verify this information, I suggest you meet privately with your ex-law partner at Two Rivers in Umatilla. Ask him why the Feds sent him out of state last February. There is only one reason. What you do with this information is up to you. If you want details on the investigation it will cost you. Talk to Mr. KENT JONES. You do not have much time. If you don’t need our help - Good Luck. P.S. They have phone taps.

Attorney A forwarded this letter to the to the U.S. Attorney's Office in Portland, Oregon on September 7, 2005.

On September 1, 2005, KENT JONES AND MARK PURSLEY met at the Grand Café in Portland, Oregon.

On September 2, 2005, an anonymous letter was sent from Portland, Oregon, to Attorney A regarding upcoming indictments against Attorney A, KENT JONES, and many others.

Specifically the letter said:

By now you have had ample time to verify our information that you, KENT JONES and many others are under indictment. To further illustrate our knowledge of your case, and I am giving you the following as proof as to how much we know.

1. Your case was presented to the Grand Jury in Boise, Idaho.
2. The AUSA's running the case are Monte Stiles and Tony Hall.
3. IRS Investigator - Greg Gleason
4. ODOJ Investigator - Ron Nelson
5. FBI - Nancy Savage

As I said before, my friend has access to the entire case and is willing to help. Time is extremely short and the choice is yours. The cost for his help is \$200,000. If yes, and you have the money, then run an ad in section 26, personal messages of the Oregonian for 5 days beginning 10-1. The message: "Please protect me St. Dashell." We'll be in touch. If no message, you will not hear from us ever again. Good Luck.

This letter was forwarded to the U.S. Attorney's Office in Portland, Oregon, on September 27, 2005. Because the letter was threatening to him, Attorney A was offered the assistance of the FBI to investigate the source of the letters. Attorney A declined the offer.

On September 6-8, 2005, MARK PURSLEY traveled from the Portland, Oregon area to southern California and back again.

On September 22, 2005, GREG SPEROW was sentenced in Portland, Oregon to 10 years in prison.

On September 30, 2005, KENT JONES and JM met at the Grand Café in Portland, Oregon.

On October 6, 2005, MARK PURSLEY met DENNIS HAMMONS and RD1 in Tigard, Oregon. They traveled in separate vehicles from Tigard to the Oregon Health Science University Hospital where KENT JONES was a patient. HAMMONS stayed at the hospital while PURSLEY went to the residence of DAMON MARSH in Portland. PURSLEY left a black backpack at MARSH's residence and returned to the hospital.

On October 11, 2005, MARK KITZMAN made a request to his probation officer to travel to St. Louis, Missouri to do a land development survey and verify property development information.

On October 12, 19 and 24, 2005, MARK PURSLEY traveled to KENT JONES' residence in Vancouver, Washington.

On November 2, 2005, MARK KITZMAN traveled from Portland, Oregon, to St. Louis, Missouri, where he met JEROD KEYSER and others to look at property in the area.

On November 27-29, 2005, MARK PURSLEY traveled from the Portland, Oregon area to southern California and back again.

On January 2, 2006, JEROD KEYSER and others traveled to Cancun Mexico. This trip was partially financed through the sale of properties in the Raptor View subdivision, an Idaho investment shared with KENT JONES.

On February 16, 2006, Attorney A called a Douglas County Drug Detective and complained about the police questioning people about him. Attorney A admitted that he was involved in cocaine in the past.

On March 13, 2006, MARK PURSLEY traveled to the Temecula, California area.

On April 7, 2006, MARK ALDERS was arrested near Gardner, Oregon for DUII. At the time of the arrest, ALDERS told the police that he was high on methamphetamine from using it two days ago and that he had not slept for three days. On April 9, 2006, KENT JONES posted bail for ALDERS in the amount of \$1,000.

On April 21, 2006, HAROLD BALLENGER was in possession of marijuana in Portland, Oregon.

Between April 21-23, 2006, MARK PURSLEY traveled from Vancouver, Washington to southern California to pick up a load of marijuana. On April 22, he was in the Hacienda Heights area of California for a few hours before returning to Vancouver.

On May 9, 2006, MARK ALDERS and TJ trimmed branches along the road at the Lakeside resort property.

On June 2, 2006, MARK PURSLEY traveled from Vancouver, Washington to the Los Angeles, California area to pick up a load of marijuana. On the afternoon of June 3, 2006, PURSLEY was in the West Los Angeles area for a few hours before returning to Vancouver.

On June 4, 2006, at approximately 2:40 p.m., MARK PURSLEY was found in possession of approximately 200 pounds of marijuana near Medford, Oregon. Although PURSLEY was in possession of his personal cell phone, he also possessed a number of prepaid phone cards. Attorney A called the Oregon State Police on behalf of PURSLEY in order to secure the release of PURSLEY's Honda Ridgeline pickup.

All in violation of Title 21, United States Code, Section 848.

COUNT TWO

Conspiracy to Manufacture/Distribute/Possess With the Intent to Distribute Controlled Substances

(Vio. 21 U.S.C. §§ 841(a)(1) and 846)

Between the dates of 1975 and June 16, 2006, in Idaho, Oregon, Washington, California, Colorado, New Mexico, Utah, Nevada, Hawaii, Wyoming, South Dakota, North Dakota, Iowa, Nebraska, Minnesota, Wisconsin, Indiana, Ohio, Pennsylvania, Kentucky, New York, and elsewhere, **KENT ALLEN JONES, GREGORY FRANK SPEROW, MARK DANIEL KITZMAN, GERALD FRANCIS MCDONALD, DENNIS BRUCE HAMMONS, HAROLD CARL BALLENGER, ROBERT DAVID LONG, MARK M. ALDERS, DAMON JOHN MARSH and MARK WILLIAM PURSLEY**, defendants herein, did knowingly and intentionally combine, conspire, confederate and agree with each other, and with other persons known and unknown to the grand jury, to manufacture, distribute and possess with the intent to distribute Schedule I and II controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), 841(b)(1)(A), and 846.

The objects of the conspiracy, and the means and methods used by the defendants and their associates to accomplish the objects of the conspiracy include, but are not limited to, the objects and means and methods set forth in Count One, which are re-alleged and incorporated herein by reference, along with all other allegations and facts set forth in Count One.

All in violation of Title 21, United States Code, Section 846.

COUNT THREE

Conspiracy to Launder Money

(**Vio. 18 U.S.C. §§ 2, 1956(a)(1)(A)(i) and (a)(1)(B), and 1956(h)**)

The allegations set forth in Counts One and Two are re-alleged and incorporated herein by reference.

Beginning on an unknown date, but existing at least between the dates of October 27, 1986 and the filing of this Indictment, in Idaho, Oregon, Washington, California, Colorado, Utah, Nevada, Hawaii, Wyoming, South Dakota, Iowa, Nebraska, Minnesota, Wisconsin, Indiana, Ohio, New York and elsewhere, **KENT ALLEN JONES, GREGORY SPEROW, MARK KITZMAN, GERALD MCDONALD, JEROD LEE KEYSER, MARK ALDERS,** and **DALE EUGENE BARKER** (hereafter “**DALE BARKER**” or “**BARKER**”), defendants herein, did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons, known and unknown to the grand jury, to commit certain offenses against the United States in violation of Title 18, United States Code, Section 1956(h) as follows:

To conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, which transaction involved the proceeds of specified unlawful activity, that is, the felonious importing, receiving, concealing, buying, selling and otherwise dealing in controlled substances, and money laundering, (1) with the intent to promote the carrying on of said specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i); (2) knowing that such transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of said specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and (3) knowing that such transaction was designed in whole and in

part to avoid a transaction reporting requirement under federal law, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii); and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

Objects of the Conspiracy

The objects of the conspiracy include, but are not limited to, the objects set forth in Count One, which are incorporated herein by reference, and the following:

- a. To financially support and maintain the criminal enterprise described in Count One, above, and the defendants' long-term, ongoing drug-trafficking and money-laundering operations, and to derive economic benefit from the same.
- b. To promote and facilitate additional money laundering and drug trafficking.
- c. To hide and protect the defendants' drug and money-laundering activities and their proceeds, and the assets which they have acquired with these proceeds.

Means and Methods

The means and methods used by the defendants and their associates to accomplish the objects of the conspiracy include, but are not limited to, the means and methods set forth in Count One, which are incorporated herein by reference.

Overt Acts

In furtherance of the conspiracy and to effect the objects of the conspiracy, and on or about the dates, times and locations set forth below, KENT ALLEN JONES, GREGORY FRANK SPEROW, MARK DANIEL KITZMAN, GERALD FRANCIS MCDONALD, JEROD LEE KEYSER, MARK M. ALDERS, and DALE EUGENE BARKER, defendants herein, and their co-conspirators committed and caused to be committed in Idaho, Oregon, Washington, California, Colorado, Utah, Nevada, Hawaii, Wyoming, South Dakota, Iowa, Nebraska,

Minnesota, Wisconsin, Indiana, Ohio, New York and elsewhere, the following overt acts, including but not limited to the predicate and overt acts set forth in Count One, above, which are incorporated herein by reference, and the following:

OVERT ACT 1

On or about November 5, 1987, GREGORY SPEROW applied for a loan secured by a mortgage against his property located at Mount Pleasant Street, Los Angeles, California, giving as his address 101 Carol Way, Aptos, California, which was his parents' address, and as his employer "Chemical Sales," as an owner, and "Birdman Construction," as an owner; his net worth was listed at \$825,017, which included three parcels of real property: two on Mt. Pleasant, in Los Angeles, and one described as San Luis Obispo Ranch.

OVERT ACTS 2 THROUGH 7

On or about the dates set forth below, GREGORY SPEROW executed and recorded and caused to be executed and recorded the following deeds for real property located in San Luis Obispo County, California, with the Deed of Trust being security for a stated loan of \$100,000:

| No. | Date | Doc No. | Deed | From | To/For |
|------------|-------------|----------------|---------------|---------------------|---------------------|
| 2 | 1/13/89 | 2551 | Quit-Claim | GREG SPEROW | Sperow Family Trust |
| 3 | 1/25/89 | 4882 | Quit-Claim | Sperow Family Trust | GREG SPEROW |
| 4 | 1/25/89 | 4883 | Quit-Claim | GREG SPEROW | Sperow Family Trust |
| 5 | 1/25/89 | 4884 | Deed of Trust | Sperow Family Trust | JLA |
| 6 | 4/23/92 | 27072 | Assignment | JLA | KW |
| 7 | 5/06/92 | 30465 | Reconveyance | | JMc & GREG SPEROW |

OVERT ACT 8

On or about October 19, 1989, GERALD MCDONALD transferred and caused the transfer via quit-claim deed to GREG SPEROW of real property located in the county of Hawaii, State of Hawaii, being parcel number 9-2-011-015.

OVERT ACTS 9 THROUGH 90

On or about the following dates, GREGORY SPEROW caused the purchase of Bank of America cashier's checks with currency in the total amount \$294,195, as set out below:

| No. | Date | Amount | Check No. | Purchaser | Stated Payee |
|------------|-------------|---------------|------------------|------------------|---------------------|
| 9 | 10/22/1990 | \$7,100 | 14265162 | Apollo Tire | GREG SPEROW |
| 10 | 11/09/1990 | \$1,000 | 14265652 | Apollo Tire | GREG SPEROW |
| 11 | 12/10/1990 | \$500 | 14265912 | Jimmy D. | GRAY SPARROW |
| 12 | 01/24/1991 | \$1,000 | 14264297 | J.D. | GREG SPEROW |
| 13 | 02/20/1991 | \$500 | 8479222 | Jimmy D. | GREG SPEROW |
| 14 | 03/11/1991 | \$500 | 14884411 | Jimmy D. | GREG SPEROW |
| 15 | 03/18/1991 | \$500 | 14884429 | JD | GREG SPEROW |
| 16 | 04/17/1991 | \$500 | 12328981 | Apollo Tire | GREG SPEROW |
| 17 | 04/30/1991 | \$500 | 12328536 | JD | GREG SPEROW |
| 18 | 05/06/1991 | \$500 | 12329073 | JD | GREY SPARROW |
| 19 | 05/20/1991 | \$500 | 8000446706 | Apollo Tire | GREG SPEROW |
| 20 | 06/18/1991 | \$500 | 8000445794 | Apollo / JD | GREY SPARROW |
| 21 | 07/05/1991 | \$500 | 8000446170 | J.D. | GREG SPEROW |

| No. | Date | Amount | Check No. | Purchaser | Stated Payee |
|------------|-------------|---------------|------------------|------------------------------|--------------------------|
| 22 | 08/03/1991 | \$1,400 | 8002664085 | Apollo (crossed out) | GREG SPEROW |
| 23 | 08/19/1991 | \$400 | 8002664380 | JD (w/ cross- out) | GREG SPEROW |
| 24 | 09/09/1991 | \$950 | 8002664807 | JD (crossed out) | GREG SPEROW |
| 25 | 09/10/1991 | \$400 | 8002664835 | Jim D | GREG SPARROW |
| 26 | 10/07/1991 | \$1,260 | 8002665339 | JD | GREY SPEROW |
| 27 | 04/23/1992 | \$950 | 8004041505 | Apollo Tire | GREG SPARROW |
| 28 | 10/06/1992 | \$1,350 | 8005977303 | J.D. | GREY SPARROW |
| 29 | 11/06/1992 | \$1,350 | 8005977874 | J.D. | GREG SPARROW |
| 30 | 12/11/1992 | \$1,350 | 8005978798 | J.D. | GREG SPARROW |
| 31 | 02/12/1993 | \$1,350 | 8007702220 | JD | GREY SPARROW |
| 32 | 03/16/1993 | \$1,150 | 8007703431 | J.D. | GREG SPARROW |
| 33 | 03/17/1993 | \$200 | 8007703451 | J.D. | GREG SPARROW |
| 34 | 03/18/1993 | \$1,250 | 8007703478 | J.D. | GR |
| 35 | 04/13/1993 | \$135 | 8007704273 | J.D. | GREG SPARROW |
| 36 | 05/10/1993 | \$1,350 | 8008148518 | J.D. | GREG SPARROW |
| 37 | 06/12/1993 | \$1,350 | 8010189761 | JD | GREG SPARROW |
| 38 | 07/06/1993 | \$800 | 8010190411 | J.D. | GR |
| 39 | 07/12/1993 | \$10,000 | 8010190585 | JD | KW |
| 40 | 07/15/1993 | \$1,350 | 8010190707 | J.D. | GRAY SPAROW |
| 41 | 08/12/1993 | \$500 | 8010191502 | All American Tire Centers | NEW TECH CONSTRUCTION |

| No. | Date | Amount | Check No. | Purchaser | Stated Payee |
|-----|------------|----------|------------|------------------------------|--|
| 42 | 08/12/1993 | \$800 | 8010191503 | All American Tire Centers | GR (w/ hand-written note: "Renmett") |
| 43 | 08/12/1993 | \$1,250 | 8010191528 | J.D. | GREG SPARROW (w/ hand-written notes: "Rescue" –crossed out, and "Jordon") |
| 44 | 09/29/1993 | \$800 | 8010192824 | J.D. | GR |
| 45 | 09/29/1993 | \$850 | 8010192825 | J.D. | GREG SPARROW |
| 46 | 10/13/1993 | \$5,000 | 8010193259 | All American Tire | NEW TECH CONSTRUCTION |
| 47 | 10/28/1993 | \$800 | 8011653438 | J.D. | GR |
| 48 | 11/10/1993 | \$800 | 8007500525 | J.D. | GR |
| 49 | 11/10/1993 | \$850 | 8007500526 | J.D. | GREG SPAROW |
| 50 | 12/13/1993 | \$400 | 8010195016 | JD | GREG SPARROW |
| 51 | 12/15/1993 | \$400 | 8011541811 | JD | GREG SPARROW |
| 52 | 12/17/1993 | \$850 | 8011541869 | JD | GREG SPARROW |
| 53 | 12/20/1993 | \$850 | 8011541976 | J.D. | GR |
| 54 | 01/09/1994 | \$10,000 | 8013641815 | JD (crossed out, w/ "?") | KW |
| 55 | 01/12/1994 | \$800 | 8013641921 | JD | GR |
| 56 | 01/27/1994 | \$850 | 8013642168 | JD | GREG SPARROW (w/ hand-written note: "JAN RENT JORDAN") |
| 57 | 02/08/1994 | \$400 | 8011542556 | JD | GREG SPARROW (w/ hand-written note: "RENT JAN JORDAN GARAGE") |
| 58 | 03/18/1994 | \$1,250 | 8013642909 | JD | GREG SPEROW |

| No. | Date | Amount | Check No. | Purchaser | Stated Payee |
|------------|-------------|---------------|------------------|---|--|
| 59 | 03/18/1994 | \$800 | 8013642910 | JD | GR |
| 60 | 03/18/1994 | \$5,000 | 8013642913 | JD | KW |
| 61 | 03/18/1994 | \$8,000 | 8013642914 | JD | PONDEROSA CUSTOM HOMES LLC |
| 62 | 03/22/1994 | \$5,000 | 8011543144 | JD | KW |
| 63 | 03/22/1994 | \$7,000 | 8011543145 | JD | PONDEROSA CUSTOM HOMES LLC |
| 64 | 04/01/1994 | \$9,000 | 8013643141 | JD | PONDEROSA CUSTOM HOMES LLC |
| 65 | 04/20/1994 | \$5,000 | 8013643742 | JD | KW |
| 66 | 04/27/1994 | \$800 | 8013643912 | JD | GR (w/ hand-written note: "APRIL RENT") |
| 67 | 04/28/1994 | \$5,000 | 8013643929 | All American Tire | PONDEROSA CUSTOM HOMES LLC |
| 68 | 05/03/1994 | \$400 | 8013644104 | JD | GREG SPEROW |
| 69 | 05/09/1994 | \$9,000 | 8013644179 | JD | PONDEROSA CUSTOM HOMES LLC |
| 70 | 05/16/1994 | \$5,000 | 8011543301 | All American (hand-written: "JD") | KW |
| 71 | 05/17/1994 | \$7,000 | 8011543302 | JD | PONDEROSA CUSTOM HOMES LLC |
| 72 | 06/06/1994 | \$400 | 8017306722 | JD | GREG SPERROW (w/ hand-written note: "JUNE RENT GARAGE 7542 JORDAN") |
| 73 | 06/08/1994 | \$1,000 | 8017306798 | All American | NEW TECH CONSTRUCTION |

| No. | Date | Amount | Check No. | Purchaser | Stated Payee |
|------------|-------------|---------------|------------------|------------------|--|
| 74 | 06/13/1994 | \$9,000 | 8017306759 | JD | PONDEROSA CUSTOM HOMES LLC |
| 75 | 06/13/1994 | \$10,000 | 8017306797 | JD | PONDEROSA CUSTOM HOMES LLC |
| 76 | 06/16/1994 | \$8,000 | 8017306908 | JD | PONDEROSA CUSTOM HOMES LLC |
| 77 | 06/21/1994 | \$12,000 | 8017306972 | JD | PONDEROSA CUSTOM HOMES LLC |
| 78 | 06/28/1994 | \$10,000 | 8018794492 | JD | PONDEROSA CUSTOM HOMES LLC |
| 79 | 07/01/1994 | \$9,000 | 8018794531 | JD | PONDEROSA CUSTOM HOMES LLC |
| 80 | 07/12/1994 | \$10,000 | 8018794770 | JD | PONDEROSA CUSTOM HOMES LLC |
| 81 | 07/12/1994 | \$5,000 | 8018794771 | J,D, | KW |
| 82 | 07/18/1994 | \$1,200 | 8018794905 | J.D. | GREG SPARROW (w/ hand-written note: "JULY - REMMET -800 JORDAN -400") |
| 83 | 08/15/1994 | \$14,000 | 8018798723 | JD | PONDEROSA CUSTOM HOMES LLC |
| 84 | 09/01/1994 | \$11,000 | 8018795632 | JD | PONDEROSA CUSTOM HOMES LLC |
| 85 | 09/01/1994 | \$13,000 | 8018795656 | JD | PONDEROSA CUSTOM HOMES LLC |
| 86 | 09/13/1994 | \$13,000 | 8018795819 | JD | PONDEROSA CUSTOM HOMES LLC |
| 87 | 10/04/1994 | \$800 | 8018799653 | JD | GR |

| No. | Date | Amount | Check No. | Purchaser | Stated Payee |
|------------|-------------|---------------|------------------|------------------|-------------------------------|
| 88 | 10/04/1994 | \$15,000 | 8018799666 | JD | PONDEROSA CUSTOM HOMES LLC |
| 89 | 10/06/1994 | \$15,000 | 8016728772 | JD | PONDEROSA CUSTOM HOMES LLC |

Total: \$294,295

OVERT ACTS 90 AND 91

On the dates set out below, GREG SPEROW, made and caused to be made the following withdrawals from Ponderosa Custom Homes LLC, account -1076, to purchase cashier's checks made payable to New Tech Construction:

| No. | Date | CC No. | Amount |
|------------|-------------|---------------|---------------|
| 90 | 10/20/94 | -1133 | \$105,000 |
| 91 | 11/08/94 | -7636 | \$105,000 |

OVERT ACT 92

On or about April 3, 1995, GREGORY SPEROW and DALE BARKER opened and caused to be opened an account in the name of Four Point Construction at Firstbank of South Jeffco, Littleton, Colorado, number -9581.

OVERT ACTS 93 THROUGH 101

On or about the dates set forth below, GREGORY SPEROW made and caused to be made the following transfers and express mailings via Federal Express, using the name of New Tech Construction and Development, Inc., at 1147 E. Broadway, Suite 77, Glendale, California:

| No. | Date | Tracking No. | Recipient |
|------------|-------------|---------------------|--|
| 93 | 08/15/94 | 1197991605 | 1 st Bank Ken Caryl Branch Littleton, CO 80127 |
| 94 | 08/17/94 | 1918793925 | 1 st Bank Ken Caryl Branch Littleton, CO 80127 |

| No. | Date | Tracking No. | Recipient |
|------------|-------------|---------------------|--|
| 95 | 08/31/04 | 2744138611 | 1 st Bank Ken Caryl Branch Littleton, CO 80127 |
| 96 | 10/05/94 | 2744138622 | 1 ST Bank Ken Caryl Branch Littleton, CO 80127 |
| 97 | 10/07/94 | 2744138644 | 1 st Bank Ken Caryl Branch Littleton, CO 80127 |
| 98 | 10/14/94 | 2744138655 | FM , Ashland, OR |
| 99 | 02/17/95 | 2744138854 | FM, Ashland, OR |
| 100 | 06/16/95 | 2744138703 | FM, Ashland, OR |
| 101 | 08/22/95 | 2744138821 | LF, Tonopah, NV |

OVERT ACT 102

On or about August 18, 1994, GREG SPEROW entered into a housing/rental agreement with the Housing Authority of the City of Los Angeles (HACLA) and MM, a renter, for real property located at 7542 Jordan Ave. Rent subsidies in the approximate amount of \$89,073.97 were received from HACLA by SPEROW between the dates of August, 18, 1994 and October 1, 2005, even though SPEROW deeded the property by quit-claim deed to the Sperow Family Trust in September, 1996.

OVERT ACT 103

On or about June 6, 1995, GREG SPEROW withdrew \$49,000 from his “Ponderosa Custom Homes” account no. –1076 and purchased cashier’s check no. 111387 made payable to “Ponderosa Custom Homes” which he then endorsed as “Ponderosa Custom Homes / New Tech Construction & Development Inc.”

OVERT ACT 104

On or about July 26, 1995, GREG SPEROW, acting through the Sperow Family Trust, caused \$200,000 to be paid to Industrial Bank, Van Nuys, California, by BR, an uncharged co-

conspirator, as a bridge loan to purchase property located on Avenue J, Lancaster, California, until the sum of \$850,000 was received by the bank from Caribbean Resource Group.

OVERT ACT 105

On or about April 8, 1996, GREG SPEROW and DALE BARKER incorporated and caused to be incorporated Silverado Custom Homes LLC, with a principle-place-of- business address of: 10940 So. Parker Road, number 201, Parker Colorado, a mail-box store, and a subsequent business address of 7102 Silverhorn Drive, Evergreen, Colorado, BARKER'S residence.

OVERT ACT 106

On or about April 10, 1996, GREG SPEROW caused accounts, -0176 and -4063, held in the name of Ponderosa Custom Homes LLC at First Bank of South Jeffco in Littleton, CO, to be closed.

OVERT ACT 107

On or about July 16, 1996, GREG SPEROW signed or caused to be signed a note to First Federal Bank in Santa Monica, California, authorizing GS, his mother, and ND, whom he falsely identified as his sister, to have access to his financial information relating to the loan on his real property at 7542 Jordan Avenue.

OVERT ACT 108

On or about September 13, 1996, GREG SPEROW and DALE BARKER caused an account to be opened in the name of Silverado Custom Homes LLC at Community Bank of Parker/Wells Fargo Bank, Littleton, Colorado, account number -4157, with an initial deposit of \$7,185.73.

OVERT ACT 109

On or about May 15, 1998, MARK KITZMAN and JL obtained a \$128,000 loan for the purchase of residential property at 4401 Southwest Stephenson Street, Portland, Oregon, with the assistance of ND and the Woodland Hills, California mortgage company, which had to obtain a special exemption to transact the mortgage in Oregon.

OVERT ACT 110

On or about May 23, 1998, KENT JONES applied for a loan to purchase real property located at Parksedge Circle, Hillsboro, Oregon, giving as his employment the business “Joe Brown Caramel Corn,” owned by JONES, and which he indicated provided him gross income of \$12,000 a month, and net income of \$6,000 a month during the previous year. He also stated he had income from self-employment in “Investments.”

OVERT ACT 111

On or about July 30, 1998, KENT JONES deposited a \$1,500 check into his –1843 account from AW, in the name of his construction business.

OVERT ACT 112

On October 15, 1998, MARK KITZMAN purchased Lot 93 located at Parks Edge in Hillsboro, Oregon from AW for \$165,000. KITZMAN paid \$10,000 down. AW discounted the sales price by \$30,000 in order to repay KITZMAN for currency KITZMAN had provided to AW.

OVERT ACTS 113 THROUGH 153

Between November 1998 and December 2003, and on the approximate dates set out below, AW wrote checks on his construction business accounts to MARK KITZMAN in the approximate total amount of \$ 200,304.25. These checks were provided to KITZMAN in exchange for currency given to AW by KITZMAN. The checks were drawn on accounts

connected with AW and his construction businesses, as if KITZMAN was working or doing legitimate construction work for AW when in fact he was not. Some of the checks were to repay KITZMAN for money KITZMAN invested in the marijuana grow houses, including the Pomona, Lesser, Marlin and Hall properties.

| No. | Date | Check No. | Job | Amount | Year Total |
|------------|-------------|------------------|------------------------------|---------------|-------------------|
| 113 | 12/11/1998 | 763 –USB4335 | 1036 E. Parksedge | \$1045 | |
| 114 | 12/22/1998 | 789 –USB-4335 | 1450/11470 Jackie | \$4,323 | \$5,368 |
| 115 | 02/12/1999 | 806 –USB1090 | 14270 B----- | \$3,465 | |
| 116 | 03/22/1999 | 827 –USB1090 | 11450 Jackie Ct. | \$3,465 | |
| 117 | 06/19/1999 | 868 –USB1090 | 14220 B----- | \$5,040 | |
| 118 | 12/05/1999 | 11463 –USB1090 | 4410 SE 64 th St. | \$10,000 | \$21,970 |
| 119 | 05/05/2000 | 11619 –USB1090 | 11709 Salmonberry | \$4,000 | |
| 120 | 06/05/2000 | 11655 –USB1090 | 11655 Salmonberry | \$7,000 | |
| 121 | 07/05/2000 | 11697 –USB1090 | Greenbluff/Salmonb | \$550 | |
| 122 | 07/05/2000 | 11675 –USB1090 | 18277 Crestline | \$3,986.25 | |
| 123 | 08/14/2000 | 1060 –USB1090 | Crestline Lot #2 | \$9,460 | |
| 124 | 10/09/2000 | 1081 –USB1090 | 1623 Maple | \$5,000 | |
| 125 | 11/17/2000 | 156 –WM4167 | 1623 Maple | \$5,000 | |
| 126 | 12/05/2000 | 11984 –USB1090 | 1637/1623 Maple | \$3,000 | |
| 127 | 12/06/2000 | 1104 –USB1090 | 1623 Maple | \$1,200 | \$39,196.25 |
| 128 | 03/05/2001 | 12136 –USB1090 | 4325 Pomona | \$10,000 | |
| 129 | 04/20/01 | 1168 –USB1090 | 615 4 th St. | \$4,270 | |
| 130 | 05/23/2001 | 1175 –USB1090 | 1637 Maple | \$5,000 | |

| No. | Date | Check No. | Job | Amount | Year Total |
|------------|-------------|------------------|-----------------|---------------|-------------------|
| 131 | 07/09/2001 | 1186 –USB1090 | 4325 Pomona | \$5,000 | |
| 132 | 09/11/2001 | 1207 –USB1090 | 4325 Pomona | \$5,000 | |
| 133 | 12/02/2001 | 1237 –USB-1090 | Maple Street | \$5,000 | \$34,270 |
| 134 | 02/25/02 | 1177 –USB1090 | 1633 Maple | \$3,000 | |
| 135 | 04/18/2002 | 119 –USB9931 | 1633/1627 Maple | \$4,820 | |
| 136 | 05/11/2002 | 128 –USB-9931 | 1627 Maple | \$5,200 | |
| 137 | 06/09/2002 | 1086 –USB9931 | 1627 Maple | \$4,800 | |
| 138 | 07/03/2002 | 156 –USB9931 | 1627 Maple | \$5,500 | |
| 139 | 08/21/2002 | 177 –USB9931 | 1633 Maple | \$5,500 | |
| 140 | 09/25/2002 | 194 –USB9931 | 900 Fairway | \$5,850 | |
| 141 | 10/21/2002 | 208 –USB 9931 | 2550 Lorinda | \$4,820 | |
| 142 | 10/28/2002 | 202 –USB9931 | | \$5,200 | |
| 143 | 10/31/2002 | 213 –USB9931 | 900 Fairway | \$5,280 | |
| 144 | 11/25/2002 | 223 –USB9931 | 2550 Lorinda | \$4,750 | |
| 145 | 12/23/2002 | 236 –USB9931 | 900 Fairway | \$4,200 | \$58,920 |
| 146 | 03/10/2003 | 281 –USB9931 | 17873 Cicero | \$4,600 | |
| 147 | 04/10/2003 | 297 –USB9931 | 17873 Cicero | \$6,000 | |
| 148 | 05/06/2003 | 360 –USB9931 | 17873 Cicero | \$5,000 | |
| 149 | 05/21/2003 | 370 –USB9931 | 2550 Lorinda | \$5,000 | |
| 150 | 07/15/2003 | 384 –USB9931 | 2550 Lorinda | \$4,800 | |
| 151 | 09/22/2003 | 305 –USB9931 | 2550 Lorinda | \$5,000 | |
| 152 | 10/08/2003 | 326 –USB9931 | | \$4,980 | |

| No. | Date | Check No. | Job | Amount | Year Total |
|------------|-------------|------------------|--------------|---------------|-------------------|
| 153 | 11/18/2003 | 458 –USB9931 | 2550 Lorinda | \$5,200 | \$40,580 |
| Total: | | \$200,304.25 | | | |

OVERT ACT 154

Between January, 1999 and June, 2005, GREG SPEROW made and caused to be made mortgage payments for the property located at 7542 Jordan Ave., Canoga Park, California, a residence which was purchased by SPEROW in June, 1990, and which he had deeded by quit-claim to the Sperow Family Trust in September, 1996. Such payments, in the approximate total amount of \$38,135.55, were paid out of the Sperow Family Trust bank account held at Wells Fargo Bank, account number –9836.

OVERT ACT 155

On or about February 8, 1999, KENT JONES deposited a third-party check which was made payable to PO in the amount of \$3,350 from Continental Casualty into JONES' –1843 account.

OVERT ACT 156

On or about June 21, 1999, KENT JONES deposited a U.S. Bank cashier's check in the amount of \$6,000 from MARK PURSLEY into his –1843 account.

OVERT ACTS 157 AND 158

On or about the dates set out below, AW wrote checks on his construction business account to defendant KENT JONES in the total amount of \$ 30,000. These checks were provided to JONES in exchange for currency given to AW by JONES. The checks contained notations which made them appear to be connected with certain properties with which they were in fact not connected.

| No. | Date | Check No. | Amount | Notation |
|------------|-------------|------------------|---------------|-----------------------------|
| | 06/16/99 | 0866 | \$ 15,000 | “Loan Repayment Jones Farm” |
| | 07/20/99 | 0875 | \$ 15,000 | “Repay Loan Jones Farm” |

OVERT ACTS 159 THROUGH 164

On or about the dates set forth below, GREG SPEROW, acting under the name of the Sperow Family Trust, caused payments of property taxes on the Santa Rosa Creek Road property in San Luis Obispo County, Parcel No. 014,192,015, to be made by checks drawn on Wells Fargo Bank, account number –9836, and signed by GR, for the years and in the amounts set out as follows:

| No. | Date | Tax Year | Check No. | Amount |
|------------|-------------|-----------------|------------------|---------------|
| 159 | 12/6/1999 | 1999/2000 | 755 | \$3,186.52 |
| 160 | 12/1/2000 | 2000/2001 | 774 | \$3,247 |
| 161 | 12/6/2001 | 2001/2002 | 503 | \$3,311.92 |
| 162 | 12/1/2003 | 2003/2004 | 540 | \$3,445.68 |
| 163 | 12/4/2004 | 2004/2005 | 563 | \$3,509.82 |
| 164 | 12/5/2005 | 2005/2006 | 580 | \$2,798.20 |

Total: \$19,499.14

OVERT ACT 165

In or about 2000, GREG SPEROW transferred and caused the transfer of the sum of \$80,000 in currency to purchase a 1965 Cessna U206, N 2132F, giving the currency to JC2 and WC, after retrieving it from inside a motor-home, in Van Nuys, California. After he purchased it, SPEROW never changed the registration on the aircraft, leaving it in the names of JC2 and WC.

OVERT ACTS 166 THROUGH 200

On or about the dates set forth below, GERALD MCDONALD sent and received, and caused to be sent and received, the following wire transfers of money in amounts, and to and from locations, as set out below (the initials "GM" represent the defendant GERALD MCDONALD; the initials "TB2" represent the alias "Tom Barnett" which was used by KENT JONES):

| No. | Date | Amount | Sender/ Receiver | Send Address/ Rec. Address | Send Location/ Rec. Location |
|------------|-------------|---------------|-----------------------------|---------------------------------------|---|
| 166 | 3/23/00 | \$200 | RD2 | 495 N. Gate Mile, Idaho Falls, ID | Idaho Falls, ID |
| | | | GM | 475 Northgate Mile, Idaho Falls, ID | Newport Beach, CA |
| 167 | 3/26/00 | \$300 | RD2 | 475 Northgate Mile, Idaho Falls, ID | Idaho Falls, ID |
| | | | GM | 475 Northgate, Idaho Falls, ID | Newport Beach, CA |
| 168 | 08/29/00 | \$1,100 | JS | Address not provided | Idaho Falls, ID |
| | | | JS | Address not provided | Idaho Falls, ID |
| 169 | 10/06/00 | \$100 | JS | 475 Northgate, Idaho Falls, ID | Idaho Falls, ID |
| | | | GM | 475 Northgate, Idaho Falls, ID | Newport Beach, CA |
| 170 | 11/06/00 | \$45 | GM | 415 Northgate Mi, Idaho Falls, ID | Idaho Falls, ID |
| | | | JW | Address not provided | Layton, UT |
| 171 | 11/07/00 | \$100 | GM | 475 Northgate MI, Idaho Falls, ID | Idaho Falls, ID |
| | | | JW | 2949 McMillin Pinion Hills, CA | Portland, OR |

| No. | Date | Amount | Sender/ Receiver | Send Address/ Rec. Address | Send Location/ Rec. Location |
|------------|-------------|---------------|-----------------------------|---|---|
| 172 | 01/28/01 | \$200 | FM | 367 Wightman St, Ashland, OR | Medford, OR |
| | | | GM | 475 Northgate Mile #C, Ashland, OR | Long Beach, CA |
| 173 | 02/25/01 | \$100 | GM | 495 Northgate Mile, Idaho Falls, ID | Hemet, CA |
| | | | RD2 | Address not provided | Idaho Falls, ID |
| 174 | 10/27/01 | \$500 | GJ | 1075 Wilkens, Woodburn, OR | Tigard, OR |
| | | | GM | 1433 Superior Ave., Newport Beach, CA | Newport, CA |
| 175 | 11/03/01 | \$500 | KJ | 503-804-4551 (Ten Mile#) | Vancouver, WA |
| | | | GM | 250 La Paoma #4, San Clemente, CA | Costa Mesa, CA |
| 176 | 11/12/01 | \$100 | GM | 250 La Palonia, San Clemente, CA | Costa Mesa, CA |
| | | | RD2 | 2252 Cornell Dr, Costa Mesa, CA | Costa Mesa, CA |
| 177 | 11/13/01 | \$100 | GM | 602 W. 4 th , Medford, OR | Medford, OR |
| | | | RD2 | Address not provided | Costa Mesa, CA |
| 178 | 01/31/02 | \$125 | GM | 2252 Corwell Dr, Costa Mesa, CA | Portland, OR |
| | | | JMc | 602 W. 4 th St, Medford, OR | Medford, OR |
| 179 | 05/27/02 | \$750 | GM | 2252 Cornell Dr, Costa Mesa, CA | Portland, OR |
| | | | DM | 3113 Monroe St, CM, CA | Costa Mesa, CA |

| No. | Date | Amount | Sender/ Receiver | Send Address/ Rec. Address | Send Location/ Rec. Location |
|------------|-------------|---------------|-----------------------------|--|---|
| 180 | 08/06/02 | \$1,000 | FM | 419 Pine St, Chiloquin, OR | Medford, OR |
| | | | GM | 2252 Cornell Dr, Costa Mesa, CA | Costa Mesa, CA |
| 181 | 08/12/02 | \$1,200 | FM | 421 Pine St, Chiloquin, OR | Canyonville, OR |
| | | | JMc | 691 Victoria St, Costa Mesa, CA | Costa Mesa, CA |
| 182 | 09/23/02 | \$600 | TM | 10533 Hwy 62, Eagle Point, OR | White City, OR |
| | | | GM | 250 La Paloma, San Clemente, CA | Costa Mesa, CA |
| 183 | 02/28/03 | \$300 | CS | 602 W. 4 th St, Medford, OR | Portland, OR |
| | | | GM | 420 Coast Hwy, Oceanside, CA | Long Beach, CA |
| 184 | 09/03/03 | \$500 | GL1 | 0320 SW Montgomery Apt #576, Portland, OR | Portland, OR |
| | | | GM | Address not provided | Costa Mesa, CA |
| 185 | 10/11/03 | \$100 | JMc | 602 W. 4 th St, Medford, OR | Medford, OR |
| | | | GM | Address not provided | Newport Beach, CA |
| 186 | 10/13/03 | \$160 | JMc | 602 W. 4 th St, Medford, OR | Medford, OR |
| | | | GM | 420 S Coast Hwy, Oceanside, CA | Newport Beach, CA |
| 187 | 11/07/03 | \$200 | JMc | 602 W. 4 th St, Medford, OR | Medford, OR |
| | | | GM | 427 S. Coast Hwy, Oceanside, CA | Costa Mesa, CA |

| No. | Date | Amount | Sender/ Receiver | Send Address/ Rec. Address | Send Location/ Rec. Location |
|------------|-------------|---------------|-----------------------------|---|---|
| 188 | 11/08/03 | \$500 | SL | 516 SW Montgomery, Portland, OR | Roseburg, OR |
| | | | GM | 421 S. Coast Hwy, Oceanside, CA | Costa Mesa, CA |
| 189 | 12/13/03 | \$300 | SJ | 516 SW Montgomery, Portland, OR | Vancouver, WA |
| | | | GM | 421 S. Coast Hwy, Oceanside, CA | Laguna Beach, CA |
| 190 | 01/12/04 | \$700 | JMc | 213 Cottage Street Medford, OR | Medford, OR |
| | | | GM | 421 S. Coast Hwy, Oceanside, CA | Costa Mesa, CA |
| 191 | 01/29/04 | \$300 | NG | 107 SE Hoover, Roseburg, OR | Roseburg, OR |
| | | | GM | Address not provided | Costa Mesa, CA |
| 192 | 03/08/04 | \$800 | TB2 | 503-789-7255 | Portland, OR |
| | | | GM | 421 S. Coast Hwy, Oceanside, CA | Costa Mesa, CA |
| 193 | 05/17/04 | \$2,200 | GM | 33022 Van Duyn Rd #13, Eugene, OR | Eugene, OR |
| | | | JLGB | Address not provided | Culiacan Sin, MX |
| 194 | 08/10/04 | \$250 | GM | 421 S. Coast Hwy, Oceanside, CA | Oceanside, CA |
| | | | RD2 | 1228 Glenwood SP #T11, Springfield, OR | Springfield, OR |
| 195 | 08/16/04 | \$400 | GM | 421 S. Coast Hwy, Oceanside, CA | Stockton, CA |
| | | | RD2 | 421 Ocean St, Oceanside, CA | Springfield, OR |

| No. | Date | Amount | Sender/ Receiver | Send Address/ Rec. Address | Send Location/ Rec. Location |
|------------|-------------|---------------|-----------------------------|---------------------------------------|---|
| 196 | 11/24/04 | \$200 | GM | 213 Cottage, Medford, OR | Myrtle Creek, OR |
| | | | GC | Address not provided | Panama, PM |
| 197 | 11/28/04 | \$300 | GM | 213 Cottage, Medford, OR | Myrtle Creek, OR |
| | | | SG | Address not provided | STO Tomas, PZ |
| 198 | 12/31/04 | \$200 | GM | 213 Cottage St, Medford, OR | Costa Mesa, CA |
| | | | SC | Address not provided | Panama, PM |
| 199 | 01/09/05 | \$69 | GM | 213 Cottage St, Medford, OR | Costa Mesa, CA |
| | | | JL | Address not provided | Panama, PM |
| 200 | 01/15/05 | \$300 | GM | 213 Cottage St, Medford, OR | Costa Mesa, CA |
| | | | KZ | Address not provided | Olongapo City, PZ |
| Total: | | \$14,799 | | | |

OVERT ACT 201

On or about April 10, 2000, KENT JONES purchased a parcel of property known as the Easter Seal property, and also as the Lakeside Resort property, consisting of approximately 7.75 acres, at Ten Mile Lake, Lakeside, Oregon, for \$550,000; the same day, KENT JONES acquired an option on a second, adjacent property, consisting of over 12 acres, also part of the original Easter Seal property. The purchase agreement and option provided for an initial payment of \$35,000, and the option provided for a sales price of \$200,000, with a \$40,000 down payment,

and a balance of \$160,000 to be paid pursuant to a promissory note secured by a trust deed.

KENT JONES paid \$35,874.27 of the price with a check drawn on his 1843 account.

OVERT ACT 202

Between April, 2000, and June 16, 2006, KENT JONES received and deposited into his –1843 and –1014 accounts over \$75,000 in payments made in the form of cashier's checks, personal checks, and business checks related to the Easter Seal/Lakeside Resort Property.

OVERT ACT 203

On or about June 15, 2000, GREG SPEROW and DALE BARKER caused the Silverado Custom Homes LLC account held at Community Bank of Parker/Wells Fargo Bank, number –4157, to be closed and a cashier's check, number –1194, to be issued in the amount of \$58,426.03 and made payable to Silverado Custom Homes LLC.

OVERT ACT 204

On or about June 15, 2000, GREG SPEROW and DALE BARKER opened and caused to be opened a certificate of deposit account at BankWest/Colorado Capital Bank, –0657, by the deposit of a cashier's check in the amount of \$58,426.03. The source of these funds was the closing of a bank account opened on September 13, 1996 under the name of Silverado Custom Homes, with a listed address at a mail box store on W. Ken Caryl Ave., Littleton, Colorado.

OVERT ACT 205

On or about June 15, 2000, GREG SPEROW and DALE BARKER caused an account to be opened at Bank West/Colorado Capital Bank, –1044, with an initial deposit of \$4,000 from cashier's check –1194. On the same day, the remaining balance from cashier's check –1194, being the sum of \$54,426.03, was used to purchase a time certificate of deposit, number –0657.

OVERT ACT 206

On or about July, 2000, KENT JONES acquired an interest in real property consisting of about 24.61 acres and located in Bonner County, Idaho, from PK and TK.

OVERT ACT 207

On or about July 17, 2000, KENT JONES deposited a Columbia Credit Union cashier's check in the amount of \$5,000 from DAMON MARSH into his -1843 account.

OVERT ACTS 208 THROUGH 227

Beginning in July, 2000, and continuing through October, 2004, KENT JONES caused over 80 payments to be made to an escrow account at Guaranty Escrow, Priest River, Idaho, for the purchase of property from PK and TK consisting of about 24.61 acres located in Bonner County, Idaho, which payments totaled over \$90,000, and included checks drawn on KENT JONES' 1843 account, and other payments on the approximate dates shown as follows:

| No. | Date | Amount | Form of Payment/Source |
|------------|-------------|---------------|-------------------------------|
| 208 | 10/10/00 | \$2,000 | 4 Money Orders of \$500 each |
| 209 | 11/01/00 | \$1,000 | Unknown |
| 210 | 8/01/01 | \$1,000 | Unknown |
| 211 | 9/01/02 | \$1,000 | Unknown |
| 212 | 3/01/2003 | \$1,000 | Check No. 2014 / Acct. -1843 |
| 213 | 3/03/2003 | \$1,000 | Check No. 2026 / Acct. -1843 |
| 214 | 5/05/2003 | \$1,000 | Check No. 2037 / Acct. -1843 |
| 215 | 7/08/2003 | \$1,000 | Check No. 2062 / Acct. -1843 |
| 216 | 9/03/2003 | \$1,000 | Check No. 2071 / Acct. -1843 |
| 217 | 10/07/2003 | \$1,000 | Check No. 2083 / Acct. -1843 |
| No. | Date | Amount | Form of Payment/Source |
| 218 | 11/02/2003 | \$1,000 | Check No. 2091 / Acct. -1843 |
| 219 | 12/02/2003 | \$1,000 | Check No. 2104 / Acct. -1843 |

| | | | |
|--------|------------|----------|--------------------------------|
| 220 | 12/29/2003 | \$1,000 | Check No. 2119 / Acct. -1843 |
| 221 | 2/08/2004 | \$1,000 | Check No. 2129 / Acct. -1843 |
| 222 | 2/28/2004 | \$1,000 | Check No. 2145 / Acct. -1843 |
| 223 | 3/28/2004 | \$1,000 | Check No. 2157 / Acct. -1843 |
| 224 | 5/02/2004 | \$1,000 | Check No. 2172 / Acct. -1843 |
| 225 | 6/02/2004 | \$1,000 | Check No. 2190 / Acct. -1843 |
| 226 | 9/10/2004 | \$1,000 | Check No. 2215 / Acct. -1843 |
| 227 | 9/29/2004 | \$1,080 | Check No. 2237 - / Acct. -1843 |
| Total: | | \$21,080 | |

OVERT ACT 228

On or about November 14, 2000, AW purchased property located on Pomona Street in Portland, Oregon, for \$73,500. AW obtained a construction loan of \$260,000 and built a house on the property. The house was sold to EB and used as a location to manufacture marijuana by the defendants KENT JONES, MARK KITZMAN and others for approximately two years.

OVERT ACT 229

Between 2001 and 2004, KENT JONES received over \$350,000 in the form of cashier's checks, business checks and wire-transfers from JRM, and in the name of business entities associated with JRM, including Global Tech Partners, LTD., Global Tech Trading Group, Inc., Enhanced Financial Services, Inc., and Cascade Sport Camp.

OVERT ACT 230

On or about February 23, 2001, KENT JONES made a single deposit of five cashier's checks totaling \$20,000, into his -1843 account, with all checks being made payable to KENT JONES, including the following:

| Check No. | Bank | Amount | Remitter |
|------------------|-------------|---------------|-----------------------------|
| 5207660304 | U.S. Bank | \$4,500 | Enhanced Financial Services |

| | | | |
|------------|------------------------|---------|------------------------------|
| 425245374 | Western Bank | \$4,500 | Enhanced Financial Services |
| 1917 | Centennial Bank | \$2,000 | Enhanced Financial Services |
| 650058077 | Washington Mutual Bank | \$4,500 | Enhanced Financial Services |
| 1001193743 | Bank of America | \$4,500 | Enhanced Financial Services. |

OVERT ACTS 231 THROUGH 276

On or about the dates set forth below, KENT JONES and GREG SPEROW caused payments to be made to Easter Seals Oregon for the purchase of adjacent properties at Ten Mile Lake, in Lakeside, Oregon, with the checks and in the amounts set out as follows:

KENT JONES: U.S. BANK OF SOUTHWEST WASHINGTON

| No. | Date | Amount | Chk. No./acct# | Payee |
|------------|-------------|---------------|-----------------------|-----------------------|
| 231 | 3/01/01 | \$1,000 | 1869 / -1843 | Easter Seal - Ln#1407 |
| 232 | 3/28/01 | \$1,000 | 1879 / -1843 | Easter Seal - Ln#1407 |
| 233 | 05/07/01 | \$1,000 | 1888 / -1843 | Easter Seal - Ln#1407 |
| 234 | 06/28/01 | \$1,000 | 1897 / -1843 | Easter Seal - Ln#1407 |
| 235 | 02/26/02 | \$1,000 | 1935 / -1843 | Easter Seal - Ln#1407 |
| 236 | 04/30/02 | \$1,000 | 1943 / -1843 | Easter Seal - Ln#1407 |
| 237 | 06/22/02 | \$5,000 | 1966 / -1843 | Easter Seal - Ln#1407 |
| 238 | 08/02/02 | \$5,000 | 1976 / -1843 | Easter Seal - Ln#1407 |

| No. | Date | Amount | Chk. No./acct# | Payee |
|------------|-------------|---------------|----------------------------------|--|
| 239 | 08/26/02 | \$90,392.66 | U.S. Bank Check No. 521820051 | Easter Seals Oregon - Camp Easter Seal Payoff |
| | Total: | \$ 106,392.66 | | |

GREG SPEROW: COLORADO CAPITAL BANK, *formerly* BANK WEST

| No. | Date | Amount | Chk. No./Acct# | Payee |
|------------|-------------|---------------|-----------------------|---------------------|
| 240 | 9/06/01 | \$1,230.26 | 1005 / -1044 | Easter Seals Oregon |
| 241 | 09/20/01 | \$1,203.26 | 1006 / -1044 | Easter Seals Oregon |
| 242 | 10/11/01 | \$1,230.26 | 1008 / -1044 | Easter Seals Oregon |
| 243 | 11/12/01 | \$1,230.26 | 1010 / -1044 | Easter Seals Oregon |
| 244 | 12/07/01 | \$1,230.26 | 1011 / -1044 | Easter Seals Oregon |
| 245 | 01/11/02 | \$1,230.26 | 1012 / -1044 | Easter Seals Oregon |
| 246 | 02/09/02 | \$1,230.26 | 1013 / -1044 | Easter Seals Oregon |
| 247 | 03/29/02 | \$1,230.26 | 1014 / -1044 | Easter Seals Oregon |
| 248 | 04/03/02 | \$1,230.26 | 1015 / -1044 | Easter Seals Oregon |
| 249 | 05/14/02 | \$1,230.26 | 1016 / -1044 | Easter Seals Oregon |
| 250 | 07/07/02 | \$1,230.26 | 1017 / -1044 | Easter Seals Oregon |
| 251 | 08/12/02 | \$1,230.26 | 1018 / -1044 | Easter Seals Oregon |
| 252 | 09/18/02 | \$1,230.26 | 1020 / -1044 | Easter Seals Oregon |
| 253 | 09/18/02 | \$1,500 | 1021 / -1044 | Easter Seals Oregon |
| 254 | 10/23/02 | \$1,230.26 | 1023 / -1044 | Easter Seals Oregon |
| 255 | 11/12/02 | \$1,230.26 | 1025 / -1044 | Easter Seals Oregon |
| 256 | 12/12/02 | \$1,230.26 | 1026 / -1044 | Easter Seals Oregon |
| 257 | 01/14/03 | \$1,230.26 | 1029 / -1044 | Easter Seals Oregon |
| 258 | 03/05/03 | \$2,460.52 | 1031 / -1044 | Easter Seals Oregon |
| 259 | 04/28/03 | \$2,460.52 | 1034 / -1044 | Easter Seals Oregon |
| 260 | 09/16/03 | \$2,460.52 | 1036 / -1044 | Easter Seals Oregon |
| 261 | 09/18/03 | \$2,460.52 | 1037 / -1044 | Easter Seals Oregon |

| No. | Date | Amount | Chk. No./Acct# | Payee |
|------------|-------------|---------------|-----------------------|---------------------|
| 262 | 10/10/03 | \$2,460.52 | 1038 / -1044 | Easter Seals Oregon |
| 263 | 12/12/03 | \$2,460.52 | 1040 / -1044 | Easter Seals Oregon |
| 264 | 01/20/04 | \$3,690.78 | 1022 / -1044 | Easter Seals Oregon |
| 265 | 06/08/04 | \$4,921.04 | 1024 / -1044 | Easter Seals Oregon |
| 266 | 08/06/04 | \$2,230.26 | 1025 / -1044 | Easter Seals Oregon |
| 267 | 08/31/04 | \$1,230.26 | 1026 / -1044 | Easter Seals Oregon |
| 268 | 09/25/04 | \$1,230.26 | 1027 / -1044 | Easter Seals Oregon |
| 269 | 01/29/05 | \$1,230.26 | 1031 / -1044 | Easter Seals Oregon |
| 270 | 04/14/05 | \$1,230.26 | 1033 / -1044 | Easter Seals Oregon |
| 271 | 05/13/05 | \$1,230.26 | 1034 / -1044 | Easter Seals Oregon |
| 272 | 06/06/05 | \$1,230.26 | 1038 / -1044 | Easter Seals Oregon |
| 273 | 07/12/05 | \$1,230.26 | 1039 / -1044 | Easter Seals Oregon |
| 274 | 09/20/05 | \$2,460.52 | 1042 / -1044 | Easter Seals Oregon |
| 275 | 11/11/05 | \$2,460.52 | 1040 / -1044 | Easter Seals Oregon |
| 276 | 01/19/06 | \$2460.52 | 1044 / -1044 | Easter Seals Oregon |
| Total: | | \$63,986 | | |

OVERT ACTS 277 THROUGH 293

On or about the following dates, GREGORY SPEROW deposited and caused to be deposited a total of \$47,500 into a bank account at Bank West/Colorado Capital Bank, account number -1044, in the name of SILVERADO CUSTOM HOMES, LLC, through the purchase of cashier's checks at the banks, in the amounts, and by means of the purchasers set out below.

| No. | Date | Amount | Check Number | Bank | Purchaser |
|------------|-------------|---------------|---------------------|-------------|------------------------------|
| 277 | 05/01/2001 | \$5,000 | - 9312 | BofA | JL |
| 278 | 05/07/2001 | \$2,500 | - 9404 | BofA | JL |
| 279 | 05/11/2001 | \$2,500 | - 1581 | WAMU | JL |
| 280 | 07/03/2001 | \$5,000 | - 0201 | BofA | American Best Driving School |

| No. | Date | Amount | Check Number | Bank | Purchaser |
|------------|-------------|---------------|-------------------------|-------------|------------------------------|
| 281 | 07/16/2001 | \$2,500 | - 0546 | BofA | American Best Driving School |
| 282 | 07/31/2001 | \$2,500 | - 0337 | BofA | GL2 |
| 283 | 07/31/2001 | \$2,500 | - 0333 | BofA | American Best Driving School |
| 284 | 10/16/2001 | \$2,500 | - 1554 | BofA | American Best Driving School |
| 285 | 04/30/2002 | \$2,500 | - 7808 | BofA | American Best Driving School |
| 286 | 07/15/2002 | \$2,500 | - 8978 | BofA | GL2 |
| 287 | 07/18/2002 | \$2,500 | - 1236 | WAMU | GL2 |
| 288 | 07/18/2002 | \$2,500 | - 9775 | WAMU | JL |
| 289 | 07/18/2002 | \$2,500 | - 1237 | WAMU | JL |
| 290 | 02/04/2003 | \$2,500 | - 2606 | BofA | GL2 |
| 291 | 02/04/2003 | \$2,500 | - 6458 | BofA | JL |
| 292 | 02/10/2003 | \$2,500 | - 8821 | WAMU | GL2 |
| 293 | 04/21/2003 | \$2,500 | - 6854 | BofA | American Best Driving School |

Total: \$47,500

OVERT ACT 294

On or about July 9, 2001, KENT JONES signed a quit-claim deed releasing his interest in the adjacent Easter Seal property, consisting of over 12 acres.

OVERT ACT 295

On or about July 9, 2001, GREG SPEROW, acting through the entity known as Silverado Custom Homes, LLC, purchased the second, adjacent Easter Seal property, consisting of over 12 acres, which had been under option by KENT JONES, for a purchase price of \$200,000, with a down payment of \$40,000.

OVERT ACT 296

On and before October 22, 2001, GREG SPEROW used three cell phones, numbers (916) 947-1711, (209) 642-0806, (530) 867-1220, which phones were obtained by SPEROW from JB2, An unindicted co-conspirator, and invoiced to him by JB2's company Western European Enterprises, also doing business as Libra Air Parts.

OVERT ACTS 297 THROUGH 366

On or about the dates set forth below, KENT JONES and MARK ALDERS sent and received, and caused to be sent and received, the following wire transfers of money in the amounts, and to and from the locations, set out below (the initials "KJ" represent the defendant KENT JONES ("TB2" represents the alias "Tom Barnett" which was used by KENT JONES); "GM" represents GERALD MCDONALD; "MA" represents MARK ALDERS):

| No. | Date | Amount | Sender/ Receiver | Send Address/ Rec. Address | Send Location/ Rec. Location |
|-----|----------|---------|---------------------|--|---------------------------------|
| 297 | 11/03/01 | \$500 | KJ | 503-804-4551 (Ten Mile #) | Vancouver, WA |
| | | | GM | 250 LaPaoma #4, San Clemente, CA | Costa Mesa, CA |
| 298 | 11/23/02 | \$900 | EN | 9701 SE Johnson Creek Blvd. B103 | Vancouver, WA |
| | | | FM | 619 Pine, Medford, OR | Medford, OR |
| 299 | 02/23/03 | \$2,000 | SL | 0320 SW Montgomery, Portland, OR | Beaverton, OR |
| | | | GL1 | Estaville Montgomery, Portland, OR | Las Vegas, NV |
| 300 | 05/07/03 | \$400 | KJ | 13200 NE 75 th , Vancouver, WA | Vancouver, WA |
| | | | MA | 241 Buckskin, Norco, CA | Ontario, CA |
| 301 | 06/27/03 | \$200 | KJ | 503-497-1958 | Tigard, OR |

| No. | Date | Amount | Sender/ Receiver | Send Address/ Rec. Address | Send Location/ Rec. Location |
|------------|-------------|---------------|-----------------------------|---|---|
| | | | MA | 3263 Rubidoux, Riverside, CA | Pomona, CA |
| 302 | 07/12/03 | \$400 | KJ | 13200 NE 77 th , Ave, Vancouver, WA | Vancouver, WA |
| | | | MA | 909-272-3939 | Pomona, CA |
| 303 | 07/26/03 | \$3,755 | SL | 320 SW Montgomery 516, Portland, OR | Portland, OR |
| | | | GL1 | Address not provided | Location not provided |
| 304 | 07/27/03 | \$300 | SL | 516 SW Montgomery, Portland, OR | Woodburn, OR |
| | | | MA | 241 Buckskin, Norco, CA | Pomona, CA |
| 305 | 07/28/03 | \$600 | SL | 516 SW Montgomery, Portland, OR | Woodburn, OR |
| | | | GL1 | Address not provided | Location not provided |
| 306 | 09/29/03 | \$500 | SL | 516 SW Montgomery, Portland, OR | Vancouver, WA |
| | | | MA | 241 Buckskin, Norco, CA | Riverside, CA |
| 307 | 10/05/03 | \$400 | SL | 516 SW Montgomery, Portland, OR | Vancouver, WA |
| | | | MA | 241 Buckskin, Norco, CA | Pomona, CA |
| 308 | 11/08/03 | \$500 | SL | 516 SW Montgomery, Portland, OR | Roseburg, OR |
| | | | GM | 421 S Coast Hwy, Oceanside, CA | Costa Mesa, CA |
| 309 | 12/13/03 | \$300 | SJ | 516 SW Montgomery, Portland, OR | Vancouver, WA |
| | | | GM | 421 S Coast Hwy, Oceanside, CA | Laguna Beach, CA |
| 310 | 01/09/04 | \$300 | KJ | 13200 NE 77 th Ave, Vancouver, WA | Vancouver, WA |

| No. | Date | Amount | Sender/ Receiver | Send Address/ Rec. Address | Send Location/ Rec. Location |
|------------|-------------|---------------|-----------------------------|---|---|
| | | | MA | 241 Buckskin Ln, Norco, CA | Reedsport, OR |
| 311 | 02/03/04 | \$200 | KJ | 13200 NE 77 th Ave, Vancouver, WA | Portland, OR |
| | | | MA | 3263 Rubidoux, Riverside, CA | Reedsport, OR |
| 312 | 02/04/04 | \$200 | KJ | 13200 NE 77 Ave, Vancouver, WA | Portland, OR |
| | | | MA | 3263 Rubidoux, Riverside, CA | Reedsport, OR |
| 313 | 02/19/04 | \$100 | KK | 518 SW Montgomery, Portland, OR | Portland, OR |
| | | | RH | 633 Old Columbia Rvr Hwy, Troutdale, OR | Fred Meyer - Salem, OR |
| 314 | 02/22/04 | \$1,500 | TB2 | 9701 SE Johnson Creek BL, Portland, OR | Vacaville, CA |
| | | | RH | 1040 NW 10 th Ave, Portland, OR | Seattle, WA |
| 315 | 03/02/04 | \$500 | TB2 | 9701 SE Johnson Creek BL, Portland, OR | Portland, OR |
| | | | MA | 1936 Castle, Roseburg, OR | Sioux Falls, SD |
| 316 | 03/08/04 | \$800 | TB2 | 9701 SE Johnson Creek BL, Portland, OR | Portland, OR |
| | | | GM | 421 S. Coast Hwy, Oceanside, CA | Costa Mesa, CA |
| 317 | 03/12/04 | \$500 | TB2 | 9701 SE Johnson Creek BL, Portland, OR | Roseburg, OR |
| | | | RH | 3633 Old Columbia Rvr Hwy, Troutdale, OR | Lake Tahoe, CA |
| 318 | 03/13/04 | \$1,500 | TB2 | 9701 SE Johnson Creek BL, Portland, OR | Portland, OR |
| | | | RH | 633 Old Columbia Rvr Hwy, Troutdale, OR | Rite Aid - Lake Tahoe, CA |

| No. | Date | Amount | Sender/ Receiver | Send Address/ Rec. Address | Send Location/ Rec. Location |
|------------|-------------|---------------|-----------------------------|---|---|
| 319 | 03/16/04 | \$900 | TB2 | 9701 SE Johnson Creek BL, Portland, OR | Tigard, OR |
| | | | RH | Address not provided | Blythe, CA |
| 320 | 03/19/04 | \$900 | TB2 | 9701 SE Johnson Creek BL, Portland, OR | Tigard, OR |
| | | | RH | 633 Old Columbia Rvr Hwy, Troutdale, OR | Rite Aid - Palm Springs, CA |
| 321 | 03/22/04 | \$500 | TB2 | 9701 SE Johnson Creek BL, Portland, OR | Roseburg, OR |
| | | | RH | 633 Old Columbia Rvr Hwy, Troutdale, OR | Safeway - Livermore, CA |
| 322 | 03/24/04 | \$900 | TB2 | 9701 SE Johnson Creek BL, Portland, OR | Wilsonville, OR |
| | | | RH | 633 Old Columbia Rvr Hwy, Troutdale, OR | El Compesino - Williams, CA |
| 323 | 03/24/04 | \$500 | TB2 | 9701 SE Johnson Creek BL, Portland, OR | Medford, OR |
| | | | RH | 633 Old Columbia Rvr Hwy, Troutdale, OR | El Compesino - Williams, CA |
| 324 | 03/25/04 | \$500 | TB2 | 9701 SE Johnson Creek BL, Portland, OR | Vancouver, WA |
| | | | RH | 633 Old Columbia Rvr Hwy, Troutdale, OR | Rite Aid - Chico, CA |
| 325 | 03/28/04 | \$300 | TB2 | 9701 SE Johnson Creek BL, Portland, OR | Portland, OR |
| | | | MA | 148 47 th Ave NE, Salem, OR | Fred Meyer - Medford, OR |
| 326 | 03/29/04 | \$100 | TB2 | 9701 SE Johnson Creek BL, Portland, OR | Portland, OR |
| | | | RH | 3633 Old Columbia Rvr Hwy, Troutdale, OR | Florence, OR |
| 327 | 03/31/04 | \$200 | TB2 | 9701 SE Johnson Creek BL, Portland, OR | Vancouver, WA |

| No. | Date | Amount | Sender/ Receiver | Send Address/ Rec. Address | Send Location/ Rec. Location |
|------------|-------------|---------------|-----------------------------|---|---|
| | | | RH | 322 Condor St #8, Jefferson, OR | Safeway - Salem, OR |
| 328 | 04/02/04 | \$500 | TB2 | 9701 SE Johnson Creek BL, Portland, OR | Portland, OR |
| | | | RH | 322 Condor #8, Jefferson, OR | Safeway - The Dalles, OR |
| 329 | 04/07/04 | \$200 | TB2 | 9701 SE Johnson Creek BL, Portland, OR | Portland, OR |
| | | | RH | 322 Concer St #5, Jefferson, OR | The Dalles, OR |
| 330 | 04/25/04 | \$500 | TB2 | 9701 SE Johnson Creek BL, Portland, OR | Portland, OR |
| | | | GL1 | 4415 SW Condor Ave, Portland, OR | Pasadena, CA |
| 331 | 04/27/04 | \$600 | TB2 | 503-804-9214 - Portland, OR | Portland, OR |
| | | | GM | 421 S. Coast Hwy, Oceanside, CA | Medford, OR |
| 332 | 04/29/04 | \$200 | MA | 1936 Castle Ave, Roseburg, OR | Council Bluffs, IA |
| | | | DA2 | 1936 Castle, Roseburg, OR | Roseburg, OR |
| 333 | 05/04/04 | \$600 | DA2 | 1417 SE Pine, Roseburg, OR | Vancouver, WA |
| | | | MA | 1936 Castle Ave | Omaha, NE |
| 334 | 05/12/04 | \$200 | MA | 1936 Castle Ave, Roseburg, OR | Post Falls, ID |
| | | | AR | Address not provided | Council Bluffs, IA |
| 335 | 05/14/04 | \$500 | DA2 | 1714 SE Kane, Roseburg, OR | Vancouver, WA |
| | | | MA | Address not provided | Beloit, WI |
| 336 | 05/26/04 | \$200 | MA | 1936 Castle Ave., Post Falls, ID | Post Falls, ID |

| No. | Date | Amount | Sender/ Receiver | Send Address/ Rec. Address | Send Location/ Rec. Location |
|------------|-------------|---------------|-----------------------------|---------------------------------------|---|
| | | | DA2 | 1936 Castle, Roseburg, ID | Roseburg, OR |
| 337 | 06/01/04 | \$800 | DA2 | 1417 SE Kane, Roseburg, OR | Portland, OR |
| | | | MA | 1936 Castle Ave, Roseburg, OR | Sheridan, WY |
| 338 | 06/02/04 | \$800 | DA2 | 1417 SE Kane, Roseburg, OR | Canby, OR |
| | | | MA | 1936 Castle Ave, Roseburg, OR | Rapid City, SD |
| 339 | 06/02/04 | \$800 | DA2 | 1417 SE Kane, Roseburg, OR | Milwaukie, OR |
| | | | MA | 1936 Castle Ave, Roseburg,, OR | Rapid City, SD |
| 340 | 06/04/04 | \$800 | DA2 | 1417 SE Kane, Roseburg, OR | Woodburn, OR |
| | | | MA | 1936 Castle Ave, Roseburg, OR | Sioux Falls, SD |
| 341 | 06/30/04 | \$200 | DA2 | 1417 SE Kane, Roseburg, OR | Vancouver, WA |
| | | | MA | 1936 Castle Ave, Roseburg, OR | Mt. Shasta, CA |
| 342 | 08/07/04 | \$200 | DA2 | 1417 SE Kane, Roseburg, OR | Vancouver, WA |
| | | | MA | 1936 Castle Ave, Roseburg, OR | Reedsport, OR |
| 343 | 08/07/04 | \$500 | SL | 4415 Condor, Portland, OR OR | Portland, OR |
| | | | GL1 | Address not provided | San Diego, CA |
| 344 | 08/09/04 | \$460 | SL | 4415 SW Condor, Portland, OR | Portland, OR |
| | | | GL1 | Address not provided | San Diego, CA |
| 345 | 08/20/04 | \$200 | JG | 560 W California St, Ontario, CA | Ontario, CA |

| No. | Date | Amount | Sender/ Receiver | Send Address/ Rec. Address | Send Location/ Rec. Location |
|------------|-------------|---------------|-----------------------------|---|---|
| | | | MA | 1936 Castle Ave, Roseburg, OR | Reedsport, OR |
| 346 | 09/04/04 | \$200 | MA | 1936 Castle Ave, Roseburg, OR | Ravena, NY |
| | | | AR | Address not provided | Atlantic, IA |
| 347 | 09/15/04 | \$1,111 | JB | 24729 Roxbury Rd, Apple Valley, CA | Apple Valley, CA |
| | | | MA | 1936 Castle Ave, Roseburg, OR | Tigard, OR |
| 348 | 09/22/04 | \$500 | DA2 | 1936 Castle, Roseburg, OR | Roseburg, OR |
| | | | MA | 1936 Castle, Roseburg, OR | Tigard, OR |
| 349 | 09/24/04 | \$457 | JB | 24729 Roybury Rd, Apple Valley, CA | Apple Valley, CA |
| | | | MA | 1936 Castle, Roseburg, OR | Tigard, OR |
| 350 | 09/24/04 | \$500 | DA2 | 1936 Castle, Roseburg, OR | Roseburg, OR |
| | | | MA | 1936 Castle, Roseburg, OR | Lake Oswego, OR |
| 351 | 10/07/04 | \$100 | DA2 | 1936 Castle, Roseburg, OR | Roseburg, OR |
| | | | MA | 1936 Castle, Roseburg, OR | Tigard, OR |
| 352 | 10/13/04 | \$200 | MA | 1936 Castle Ave, Roseburg, OR | Worthington MN |
| | | | AR | 356 Benton St. Apt 2, Council Bluffs, IA | Council Bluffs, IA |
| 353 | 10/22/04 | \$1,210 | JB | 24729 Roxbury Rd, Apple Valley, CA | Apple Valley, CA |
| | | | MA | 1936 Castle Ave, Roseburg, OR | Roseburg, OR |

| No. | Date | Amount | Sender/ Receiver | Send Address/ Rec. Address | Send Location/ Rec. Location |
|------------|-------------|---------------|-----------------------------|---------------------------------------|---|
| 354 | 10/29/04 | \$900 | JB | 24729 Roxbury Rd, Apple Valley, OR | Apple Valley, CA |
| | | | MA | 1963 Castle Ave, Roseburg, OR | Spokane, WA |
| 355 | 10/31/04 | \$400 | JB | 24729 Roxbury Rd, Apple Valley, OR | Hesperia, CA |
| | | | MA | Address not provided | Sioux Falls, SD |
| 356 | 11/01/04 | \$200 | DA2 | 1936 Castle St, Roseburg, OR | Roseburg, OR |
| | | | MA | 1936 Castle, Roseburg, OR | Elyria, OH |
| 357 | 11/09/04 | \$950 | JB | 24729 Roxbury, Apple Valley, CA | Apple Valley, CA |
| | | | MA | 1936 Castle Ave, Roseburg, OR | Tigard, OR |
| 358 | 11/09/04 | \$200 | MS2 | 560 W. Nevada St, Ontario, CA | Ontario, CA |
| | | | MA | 1936 Castle Ave, Roseburg, OR | Tigard, OR |
| 359 | 11/10/04 | \$1,200 | DA2 | 1936 Castle St, Roseburg, OR | Roseburg, OR |
| | | | MA | 1936 Castle St, Roseburg, OR | Tigard, OR |
| 360 | 12/16/04 | \$500 | TB2 | P.O. Box 375, Ahwahnee, CA | Oakhurst, CA |
| | | | ZM | 699-845 Sierra Rd, Susanville, CA | Susanville, CA |
| 361 | 01/06/05 | \$500 | DA2 | 1317 SE Kane, Roseburg, OR | Vancouver, WA |
| | | | MA | 1936 Castle Ave, Roseburg,, OR | Michigan City, IN |
| 362 | 01/06/05 | \$200 | DA2 | 1936 Castle St, Roseburg, OR | Roseburg, OR |

| No. | Date | Amount | Sender/ Receiver | Send Address/ Rec. Address | Send Location/ Rec. Location |
|------------|-------------|---------------|-----------------------------|---------------------------------------|---|
| | | | MA | 1936 Castle, Roseburg, OR | Michigan City, IN |
| 363 | 01/06/05 | \$900 | EH | 24772 Roxbury, Apple Valley, CA | Apple Valley, CA |
| | | | MA | 1936 Castle, Roseburg, OR | Michigan City, IN |
| 364 | 01/07/05 | \$900 | EH | 24772 Roxbury, Apple Valley, CA | Apple Valley, CA |
| | | | MA | 1936 Castle Ave, Roseburg, OR | Sandusky, OH |
| 365 | 01/19/05 | \$500 | DA2 | 1317 SE Kane, Roseburg, OR | Salem, OR |
| | | | MA | 1936 Castle Ave, Roseburg, OR | Rapid City, SD |
| 366 | 01/26/05 | \$200 | MS2 | 560 W. Nevada St, Ontario, CA | Ontario, CA |
| | | | MA | 1936 Castle Ave, Roseburg, OR | Reedsport, OR |
| Total: | | \$41,243 | | | |

OVERT ACT 367

Between December, 2001 and June, 2005, GREG SPEROW made and caused to be made mortgage payments for the property located at 1433 Mt. Pleasant, a residential property owned by SPEROW and used by SPEROW and others to facilitate drug-trafficking and money-laundering activities. Such payments, in the approximate total amount of \$ 45,202.69, were made out of the Sperow Family Trust bank account held at Wells Fargo Bank, Account No. -9836.

OVERT ACT 368

Between January, 2002 and June, 2005, GREG SPEROW made and caused to be made deposits of rent receipts from rentals of the property located at 1433 Mt. Pleasant, which property consists of three apartments. Such deposits, in the approximate total amount of \$ 84,162, were deposited into the Sperow Family Trust bank account held at Wells Fargo Bank, Account No. -9836.

OVERT ACT 369

Between the dates of January, 2002 and June, 2005, GREG SPEROW deposited or caused to be deposited rent payments received from MM, renter of the property at 7542 Jordan Avenue, to the Sperow Family Trust, Account No. -9836, the sum of \$ 40,646, in the form of money orders made payable to GS.

OVERT ACT 370

On or about May 3, 2002, GREG SPEROW recorded and caused to be recorded with the Federal Aviation Administration documentation of conveyance and ownership of a Cessna 182M aircraft, number N 70915, under the name of Greg Westbrook, owner, and giving as his address a Seattle address; the seller of the aircraft was listed as Western European Enterprises, a company owned and controlled in part by SPEROW.

OVERT ACTS 371 THROUGH 420

On or about the dates set forth below, GREG SPEROW caused deposits to be made to account number -1044 at Bank West/Colorado Capital Bank, in the name of Silverado Custom Homes LLC, by means of the following money orders:

| No. | Date | Amount | Instrument | Agent Location | Co.* |
|------------|-------------|---------------|-------------------|-----------------------|-------------|
| 371 | 05/06/2002 | \$500 | -2255 | N Hollywood | WU |
| 372 | 05/06/2002 | \$500 | -2256 | N Hollywood | WU |
| 373 | 05/06/2002 | \$500 | -2257 | N Hollywood | WU |

| | | | | | |
|------------|-------------|---------------|-------------------|-----------------------|-------------|
| 374 | 05/06/2002 | \$500 | -2258 | N Hollywood | WU |
| 375 | 05/06/2002 | \$500 | -2259 | N Hollywood | WU |
| No. | Date | Amount | Instrument | Agent Location | Co.* |
| 376 | 02/10/2003 | \$500 | -7599 | Sun Valley | CE |
| 377 | 02/10/2003 | \$500 | -7600 | Sun Valley | CE |
| 378 | 02/10/2003 | \$500 | -7601 | Sun Valley | CE |
| 379 | 02/10/2003 | \$500 | -7602 | Sun Valley | CE |
| 380 | 02/10/2003 | \$500 | -7603 | Sun Valley | CE |
| 381 | 07/25/2003 | \$500 | -0711 | N Hollywood | WU |
| 382 | 07/25/2003 | \$500 | -0712 | N Hollywood | WU |
| 383 | 07/25/2003 | \$500 | -0713 | N Hollywood | WU |
| 384 | 07/25/2003 | \$500 | -0714 | N Hollywood | WU |
| 385 | 07/25/2003 | \$500 | -0715 | N Hollywood | WU |
| 386 | 07/25/2003 | \$500 | -0717 | N Hollywood | WU |
| 387 | 07/25/2003 | \$500 | -0718 | N Hollywood | WU |
| 388 | 07/25/2003 | \$500 | -0719 | N Hollywood | WU |
| 389 | 07/25/2003 | \$500 | -0720 | N Hollywood | WU |
| 390 | 07/25/2003 | \$500 | -0721 | N Hollywood | WU |
| 391 | 11/25/2003 | \$1,000 | -4993 | N Hollywood | TE |
| 392 | 11/25/2003 | \$1,000 | -5004 | N Hollywood | TE |
| 393 | 11/25/2003 | \$500 | -5015 | N Hollywood | TE |
| 394 | 12/05/2003 | \$500 | -7408 | N Hollywood | WU |
| 395 | 12/05/2003 | \$500 | -7409 | N Hollywood | WU |
| 396 | 12/05/2003 | \$500 | -7410 | N Hollywood*** | WU |
| 397 | 12/05/2003 | \$500 | -7411 | N Hollywood | WU |
| 398 | 12/05/2003 | \$500 | -7412 | N Hollywood | WU |
| 399 | 01/27/2004 | \$500 | -3782 | N Hollywood | WU |

| | | | | | |
|-----|------------|-------|-------|-------------|----|
| 400 | 01/27/2004 | \$500 | -3783 | N Hollywood | WU |
| 401 | 01/27/2004 | \$500 | -3784 | N Hollywood | WU |
| 402 | 01/27/2004 | \$500 | -3785 | N Hollywood | WU |

| No. | Date | Amount | Instrument | Agent Location | Co.* |
|------------|-------------|---------------|-------------------|-----------------------|-------------|
| 403 | 01/27/2004 | \$500 | -3786 | N Hollywood | WU |
| 404 | 01/12/2004 | \$1,000 | -9919 | N Hollywood | TE |
| 405 | 01/12/2004 | \$1,000 | -9920 | N Hollywood | TE |
| 406 | 01/12/2004 | \$500 | -9930 | N Hollywood | TE |
| 407 | 04/06/2005 | \$1,000 | -8978 | Unknown | TE |
| 408 | 04/06/2005 | \$1,000 | -4688 | Unknown | TE |
| 409 | 04/06/2005 | \$1,000 | -9163 | Unknown | TE |
| 410 | 04/06/2005 | \$1,000 | -8093 | Unknown | TE |
| 411 | 05/05/2005 | \$1,000 | -0304 | Unknown | TE |
| 412 | 05/05/2005 | \$1,000 | -3913 | Unknown | TE |
| 413 | 05/05/2005 | \$1,000 | -2094 | Unknown | TE |
| 414 | 05/11/2005 | \$500 | -0124 | Unknown | TE |
| 415 | 05/20/2005 | \$1,000 | -0113 | Unknown | TE |
| 416 | 05/20/2005 | \$1,000 | -9481 | El Monte, CA | WU |
| 417 | 05/20/2005 | \$1,000 | -88170 | Unknown | TE |
| 418 | 07/11/2005 | \$500 | -58170 | Unknown | TE |
| 419 | 07/11/2005 | \$1,000 | -8169 | Unknown | TE |
| 420 | 07/11/2005 | \$1,000 | -8173 | Unknown | TE |
| 421 | 07/11/2005 | \$1,000 | -3984 | Unknown | TE |
| | Total: | \$34,000 | | | |

*WU= Western Union; TE= Travelers Express; CE= Continental Express

OVERT ACTS 422 THROUGH 425

On the dates set out below, JEROD KEYSER caused the following payments to be made to KENT JONES from Infinity Financial Group, LLC, in connection with loans relating to KENT_JONES' properties, and the grow-house properties:

| No. | Date | Amount | Deposited To |
|---------------------|-------------|---------------|--------------------------|
| 422 | 5/20/02 | \$200 | Kent Jones –1843 Account |
| 423 | 7/17/02 | \$350 | Kent Jones –1843 Account |
| 424 | 10/31/02 | \$250 | Kent Jones –1843 Account |
| 425 | 10/03/03 | \$105,441.08 | Kent Jones –1843 Account |
| Total: \$106,241.08 | | | |

OVERT ACT 426

On or about July 17, 2002, KENT JONES deposited a Columbia Credit Union cashier's check in the amount of \$3,600 from DAMON MARSH into his –1843 account.

OVERT ACT 427

On or about July 18, 2002, GREG SPEROW, using the name Greg Westbrook, deposited and caused to be deposited into his Maxair Aviation account, number –0562, at Union Bank of California, a total of fourteen (14) \$100 bills and sixty (60) \$50 bills, being \$4,400, less \$11.20 tendered to the bank, for a net deposit of \$4,388.80.

OVERT ACTS 428 AND 429

On or about the dates set forth below, GREG SPEROW caused deposits to be made to account number –1044 at Bank West/Colorado Capital Bank, in the name of Silverado Custom Homes, LLC, with the proceeds from the following two loans, which were handled by ND and the Woodland Hills mortgage company:

| No. | Date | Amount | Property Location | Titled Owner |
|------------|-------------|---------------|------------------------------|---------------------|
| 428 | 08/05/02 | \$141,230.23 | Stansbury St., Van Nuys, CA. | JJM and BJM |
| 429 | 08/05/02 | \$15,937.50 | Valerio St., Reseda, CA. | CCL |

OVERT ACT 430

On or about September 19, 2002, GREG SPEROW changed the name of the corporation he created, and which was associated with his business Maxair Aviation, from “NT-GWB, Inc.” to “MIA, Inc.”

OVERT ACT 431

On or about October 29, 2002, GREGORY SPEROW purchased a season ski pass at Heavenly Valley, California, utilizing a CitiBank Mastercard, No. –5517, in the name of JL of Southern California. GREGORY SPEROW had signature authority on the card but was not contractually liable for the balance.

OVERT ACT 432

On or about October 30, 2002, KENT JONES paid \$30,000 by check drawn on JONES’ –1843 account to JEROD KEYSER, which KEYSER deposited into the Infinity Financial account.

OVERT ACT 433

On or about November 25, 2002, GREG SPEROW registered his corporation “MIA, Inc.” under the “fictitious business name” of “New Tech Construction,” with a business address of 1433 1/2 Mt. Pleasant, Los Angeles, California.

OVERT ACTS 434 THROUGH 438

On or about the dates set out below, GREG SPEROW caused the following payments to be made out of the Silverado Custom Homes, LLC account, number –1044 at Bank West/Colorado Capital Bank, for the purchase of real property located in Mendocino County, California, Escrow Number –11SF:

| No. | Date | Payee | Check No. | Amount |
|------------|-------------|----------------------|------------------|---------------|
| 434 | 12/18/02 | First American Title | 1027 | \$150,000 |
| 435 | 01/06/03 | First American Title | 1028 | \$40,000 |
| 436 | 02/09/03 | First American Title | 1030 | \$10,000 |
| 437 | 03/14/03 | First American Title | 1032 | \$7,500 |
| 438 | 03/27/03 | First American Title | 1033 | \$100,000 |
| Total: | | | | \$307,500 |

OVERT ACT 439

Between January 2003 and July 2003, AW conducted financial transactions with proceeds of drug trafficking provided in whole and in part by defendants KENT JONES and MARK KITZMAN, which transactions were a series of payments on the mortgage for the Marlin Drive property, a residence used as a marijuana grow house, in the approximate amount of \$1,293 per month, and totaling approximately \$10,391.

OVERT ACT 440

Between March 2003 and August 2004 KENT JONES caused checks to be drawn on account number –1843 at U.S. Bank, 1607 Main St., Vancouver, WA, and made payable to Panhandle Escrow, for Escrow Nos. –3796 and –3797 for the purchase of two parcels of real property in Priest River, Idaho, and known as Raptor View Estates; the checks were generally in the amounts of \$710.31 and \$640.93, and totaled \$22,260.77.

OVERT ACTS 441 THROUGH 447

On or about the dates set out below, AW conducted financial transactions which involved the proceeds of drug trafficking provided by defendants KENT JONES and MARK KITZMAN, consisting of payments with currency and checks to purchase cashier's checks, in amounts as set forth below, for the down payment on the Hall Blvd. property, a residence used as a marijuana grow house.

| No. | Date | Amount | Form | Purchased at: |
|------------|-------------|---------------|-----------------------------|------------------------|
| 441 | 5/8/03 | \$5,000 | Cashier's check #0668807601 | Wells Fargo Bank |
| 442 | 5/9/03 | \$2,500 | Cashier's check #0657707968 | Wells Fargo Bank |
| 443 | 5/9/03 | \$2,500 | Cashier's check #0652304689 | Wells Fargo Bank |
| 444 | 5/9/03 | \$2,500 | Cashier's check #065362892 | Washington Mutual Bank |
| 445 | 5/12/03 | \$6,312.02 | Cashier's check #521531041 | U.S. Bank |
| 446 | 5/12/03 | \$5,000 | Cashier's check #1001732026 | Bank of America |
| 447 | 5/12/03 | \$5,000 | Cashier's check #641704337 | Washington Mutual Bank |
| Total: | | \$28,812.02 | | |

OVERT ACT 448

On May 13, 2003, JM purchased the Hall Blvd. property with a cashier's check in the amount of \$28,812.02, which he brought to the closing.

OVERT ACT 449

On May 13, 2003, JM purchased the Hall Blvd. property with funds from a loan brokered by Infinity Financial Group, LLC, and defendant JEROD KEYSER.

OVERT ACT 450

On or about September 3, 2003, KENT JONES deposited into his -1843 account the sum of \$6,000, consisting of \$1,200 in currency and \$4,800 from KENT JONES' account, number -1014, in the name of Ten Mile Properties LLC, showing a note referencing 2002 rent from MARK KITZMAN.

OVERT ACTS 451 THROUGH 453

On the dates set out below, AW conducted financial transactions which involved the proceeds of drug trafficking provided by defendants KENT JONES and MARK KITZMAN, and AW, and which financial transactions consisted of payments with currency to MR1, RP, JM and DA to be used by them to hire attorneys:

| No. | Date | Amount | Payee(s) | Grow Residences Involved |
|------------|-------------|---------------|-----------------|---------------------------------|
|------------|-------------|---------------|-----------------|---------------------------------|

| | | | | |
|--------|---------|----------|------------|--------------------------|
| 451 | 1/13/04 | \$3,000 | RP, JM, DA | Hall Blvd., Marlin Drive |
| 452 | 1/23/04 | \$15,000 | RP, JM, DA | Hall Blvd., Marlin Drive |
| 453 | 1/26/04 | \$1,200 | MR1 | Lesser Road |
| Total: | | \$19,200 | | |

OVERT ACT 454

On or about February 17, 2004, KENT JONES caused the proceeds of a Capital One installment loan of \$20,211 to be deposited into his bank account number –1843.

OVERT ACTS 455 THROUGH 457

On or about the dates set forth below, GREG SPEROW made the following telephone calls using a Nokia AT&T cell phone, no. (916) 947 -1711, subscribed to by JB2, which were made to the telephone subscribed to by DALE BARKER at his residential address in Evergreen, Colorado, as follows:

| No. | Date | Time | Duration |
|------------|-------------|-------------|-----------------|
| 455 | 4/30/04 | 9:08 pm | 00:02:00 |
| 456 | 5/01/04 | 7:59 am | 00:02:00 |
| 457 | 5/01/04 | 8:09 am | 00:11:00 |

OVERT ACT 458

On or about June 8, 2004, MARK KITZMAN, through JL, obtained \$22,923.30 from a refinance loan of \$168,000 on residential property at 4401 Southwest Stephenson Street, Portland, Oregon, with the assistance of JEROD KEYSER and Infinity Financial Group, LLC, Priest River, Idaho; the property was acquired and titled in the name of JL.

OVERT ACTS 459 THROUGH 464

On the dates set out below, GREG SPEROW and DALE BARKER deposited or caused the deposit of cashier’s checks which were purchased with funds drawn from the Silverado

Custom Homes, LLC, account at Colorado Capital Bank/BankWest, account number –0657, which were made payable to CB, and which were deposited to account number –7414 at Community First Bank/Bank of the West, an account under the name of DALE BARKER and Four Point Construction, Inc.:

| No. | Date | Check No. | Amount |
|------------|-------------|------------------|---------------|
| 459 | 08/06/04 | –4945 | \$10,000 |
| 460 | 08/06/04 | –4950 | \$8,659.93 |
| 461 | 09/13/04 | –4951 | \$10,000 |
| 462 | 09/27/04 | –4947 | \$10,000 |
| 463 | 09/27/04 | –4948 | \$10,000 |
| 464 | 09/27/04 | –4949 | \$10,000 |
| Total: | | | \$ 58,659.93 |

OVERT ACT 465

On or about September 8, 2004, KENT JONES transferred his interest in real property consisting of about 24.61 acres located in Bonner County, Idaho, to JEROD KEYSER and AK.

OVERT ACT 466

On or about October 22, 2004, JEROD KEYSER obtained a construction loan from which approximately \$80,000 was paid to PK and TK, to pay off the Guaranty Escrow, Priest River, Idaho, account on which payments had been made by KENT JONES for the 24.61-acre property.

OVERT ACTS 467 THROUGH 470

On or about the dates listed below KENT JONES made payments toward the Capital One installment loan of \$20,211 by means of \$ 2,000 in money orders which he purchased at Fred Meyer and “7-Eleven” as follows:

| <u>No.</u> | <u>Date</u> | <u>M.O. No.</u> | <u>Amount</u> | <u>Issuing Agent</u> |
|------------|-------------|-----------------|---------------|----------------------|
| 467 | 01/10/05 | 08-045681981 | \$500 | Fred Meyer |
| 468 | 01/10/05 | 08-045681986 | \$500 | Fred Meyer |
| 469 | 01/25/05 | 05-107952823 | \$500 | 7-Eleven |
| 470 | 01/25/05 | 05-107952822 | \$500 | 7-Eleven |
| Total: | | \$2,000 | | |

OVERT ACT 471

On or about May 3, 2005, KENT JONES caused the sum of \$9,563.65 to be paid toward the Capital One installment loan of \$20,211 by means of check number 1005, issued out of the Raptor View Estates, LLC, U.S. Bank account number –5857.

OVERT ACTS 472 AND 473

On the dates set out below, GREG SPEROW caused the following deposits to be made to account number –1044, in the name of Silverado Custom Homes LLC, by means of checks drawn on his lawyer’s trust account held in SPEROW’S name by Attorney B:

| <u>No.</u> | <u>Date</u> | <u>Check No.</u> | <u>Amount</u> |
|------------|-------------|------------------|---------------|
| 472 | 10/25/05 | 705 | 10,000 |
| 473 | 11/05/05 | 708 | 5,000 |

OVERT ACT 474

On or about March 23, 2006, GREG SPEROW and DALE BARKER deposited and caused the deposit of a cashier's check in the amount of \$100,000 which was made payable to Silverado Custom Homes and which was purchased by Attorney B.

OVERT ACT 475

On or about April 9, 2006, KENT JONES paid \$1000 in \$100-bills to bail MARK ALDERS out of jail in Reedsport, Oregon, where ALDERS had been held after being arrested by the Reedsport Police Department April 7th for driving under the influence.

All in violation of Title 18, United States Code, Sections 2 and 1956(h).

COUNT FOUR

Conspiracy to Launder Money

(Vio. 18 U.S.C. §§ 2, 371, and 31 U.S.C. §§ 5324(a)(1) and (3))

The allegations set forth in Counts One and Three are re-alleged and incorporated herein by reference.

Beginning on an unknown date, but existing at least between the dates of October 27, 1986 and the filing of this Indictment, in Idaho, Oregon, Washington, California, Colorado, Utah, Nevada, Hawaii, Wyoming, South Dakota, Iowa, Nebraska, Minnesota, Wisconsin, Indiana, Ohio, New York and elsewhere, **KENT ALLEN JONES, GREGORY FRANK SPEROW, MARK DANIEL KITZMAN, GERALD FRANCIS MCDONALD, JEROD LEE KEYSER, MARK M. ALDERS, and DALE EUGENE BARKER**, defendants herein, did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons, known and unknown to the grand jury, to commit certain offenses against the United States in violation of Title 18, United States Code, Section 371 in that for the purpose of

evading the reporting requirements of Title 31, United States Code, Section 5313(a) and the regulations prescribed thereunder, the defendants did cause and attempt to cause a domestic financial institution to fail to file a report required under Section 5313(a), in violation of Title 31, United States Code, Section 5324(a)(1); and did knowingly and intentionally structure and assist in structuring transactions with a domestic financial institution in violation of Title 31, United States Code, Section 5324(a)(3).

Objects of the Conspiracy

The objects of the conspiracy include, but are not limited to, the objects set forth in Counts One and Three, which are incorporated herein by reference.

Means and Methods

The means and methods used by the defendants and their associates to accomplish the objects of the conspiracy include, but are not limited to, the means and methods set forth in Counts One and Three, which are incorporated herein by reference.

Overt Acts

The overt acts committed and caused to be committed by the defendants and their associates to accomplish the objects of the conspiracy include, but are not limited to, the overt acts set forth in Counts One and Three, which are incorporated herein by reference.

All in violation of Title 18, United States Code, Sections 2 and 371.

COUNT FIVE

Continuing Criminal Enterprise – Forfeiture

(**Viol. 21 U.S.C. §§ 848 and 853**)

From their engagement in the Continuing Criminal Enterprise, as charged herein, the defendants, **KENT JONES, GREG SPEROW, MARK KITZMAN, GERALD MCDONALD, HAROLD BALLENGER** and **DENNIS HAMMONS**, shall forfeit to the United States (1) any and all property, real and personal, tangible and intangible, including rights, privileges, interests, claims and securities, constituting or derived from any proceeds they obtained, directly or indirectly, from their participation in the said enterprise; (2) any and all property, real and personal, tangible and intangible, used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violations as charged herein; and (3) any of their interest in, claims against, and property and contractual rights which afforded a source of control over, said enterprise. These interests include, but are not limited to, the following properties:

ALL DEFENDANTS

Cash Proceeds: At least \$20 million in United States currency and all interest and proceeds traceable thereto, in that such sum in aggregate is property which constituted proceeds of the charged offenses, or was received in exchange for the distribution of controlled substances, and was subsequently expended, spent, distributed or otherwise disposed of by the defendants, and as to which the defendants are jointly and severally liable.

DEFENDANT KENT ALLEN JONES

A. **Real Property and Proceeds thereof:** All right, title and interest in land and appurtenances and improvements, including buildings and residences, and proceeds of sale thereof, more fully described below:

1. All of that certain parcel of land located at **1190 N. Ten Mile Lake, Lakeside, Oregon**, and more particularly described as:

That portion of SE 1/4 of the SE 1/4 of Section 4, Township 23 South, Range 12 West of the Willamette Meridian, Coos County, Oregon, described as follows: Beginning at the Northeast corner of the SE 1/4 of the SE 1/4 of said Section 4; thence West 675.38 feet along the North line of said SE 1/4 of the SE 1/4 to the true point of beginning; thence along the adjusted line South 3.43 feet, more or less, to a 5/8 inch iron rod; thence South 1° 54' 40" West 161.72 feet to a 5/8 inch iron rod in the centerline of an existing gravel road; thence South 16° 18' 33" East 93.30 feet to a 5/8 inch iron rod; thence South 13° 56' 59" East 187.96 feet to a 5/8 inch iron rod; thence continuing South 13° 56' 59" East 91.6 feet, more or less, to the normal high water line of Ten Mile Lake; thence South to the South line of said SE 1/4 of the SE 1/4 of Section 4; thence West along said South line to the Southwest corner of the SE 1/4 of the SE 1/4 of said Section 4; thence North along the West line of said SE 1/4 of the SE 1/4 to the Northwest corner of the SE 1/4 of the SE 1/4; thence East along the North line of said SE 1/4 of the SE 1/4 to the true point of beginning.

ALSO: A parcel of land lying in the NE 1/4 of the SE 1/4 of Section 4, Township 23 South, Range 12 West of the Willamette Meridian, Coos County, Oregon, being a portion of that tract of land described in deed to Robert T. and Agnes Ewen, recorded in Book 280, Page 170, Deed Records of Coos County, Oregon, described as follows: Beginning at the Southeast corner of the NE 1/4 of the SE 1/4 of said Section 4; thence following the South line of said NE 1/4 of the SE 1/4 West 912.81 feet; more or less, to the Southeast corner of the tract to be conveyed and the true point of beginning; thence West 227.19 feet, more or less, to the East shore of North Ten Mile Lake; thence following said shore line North 50° 59' 44" East 176.55 feet, more or less; thence South 39° 00' 16" East 142.99 feet, more or less, to the true point of beginning.

2. All of that certain parcel of land located at **13200 NE 77th Ave.,**

Vancouver, WA, and more particularly described as:

Lot 2 of Short Plats, recorded in Book 2 of Short Plats, Page 241, Records of Clark County, Washington.

Together with an easement for road purposes as shown on the Short Plat and by documents recorded under Auditor's File No. 8505280050 and 8505280051

3. All of that certain parcel of land located at **7602 NE 129th St.,**

Vancouver, WA, and more particularly described as:

Lot 3 of SHORT PLAT, recorded in Book 2, Page 241, records of Clark County, Washington, being a portion of the Northwest quarter of Section 29, Township 3, North, Range 2 East of the Willamette Meridian, Clark County, Washington.

4. All of that certain parcel of land located at **9017 NE Levee Road,**

Portland, Oregon, and more particularly described as:

Lot 1, Block 1, KRNAC Estates, City of Portland, Multnomah County, Oregon, APN R199843.

5. All that certain parcel of land located at Priest River, Bonner County,

Idaho, and more particularly described as:

A tract of land located in Government Lot 2 of Section 4, Township 55 North, Range 4 West, Boise Meridian, Bonner County, Idaho, more particularly described as follows:

Beginning at the intersection of the South line of said Government Lot 2 and the Westerly right of way line of "Thama Ferry Road," said intersection being North 89 degrees 21'48" West, 971.71 feet from the Southeast corner of said Government Lot 2;

thence North 89 degrees 21'48" West, 370.27 feet to the Southwest corner of said Government Lot 2;

thence North 0 degrees 32'36" East, 60.00 feet along the West line of said Government Lot 2;

thence North 5 degrees 19'46" West, 1189 feet, more or less, to its intersection with the ordinary high water line of the Pend Oreille River;

thence Easterly along said ordinary high water line, to a point which lies North 35 degrees 00'08" East, 297.81 feet and North 89 degrees 21'48" West, 262.72 feet and North 20 degrees 33'39" East, 713 feet, more or less, from the point of beginning;

thence South 20 degrees 33'39" West, 713 feet, more or less;

thence South 89 degrees 21'48" East 262.72 feet to its intersection with said Westerly right of way line of "Thama Ferry Road";

thence South 35 degrees 00'08" West, 297.81 feet along said right of way line to the point of beginning.

TOGETHER WITH that part of said Government Lot 2, lying North of the above described tract, South of the original mean high water line and between the Northerly extension of the East and West side lines of the above described tract.

EXCEPTING THEREFROM those portions which were thereafter legally transferred to bona fide purchasers and as to which the defendant Kent Jones has no continuing interest, including any security interest.

6. All that certain parcel of land located at Priest River, Bonner County, Idaho, and more particularly described as:

A tract of land located in Government Lot 2 of Section 4, Township 55 North, Range 4 West, Boise Meridian, Bonner County, Idaho, more particularly described as follows:

Beginning at a point on the Westerly right of way line of "Thama Ferry Road," said point being North 89 degrees

21'48" West 971.71 feet along the South line of said Government Lot 2 and North 35 degrees 00'08" East 297.81 feet along said Westerly right of way line of "Thama Ferry Road," all from the Southeast corner of said Government Lot 2;

thence North 89 degrees 21'48" West 262.72 feet;

thence North 20 degrees 33'39" East 713 feet, more or less, to its intersection with the ordinary high water line of the Pend Oreille River;

thence Easterly, along said ordinary high water line, to its intersection with said Westerly right of way line of "Thama Ferry Road";

thence Southwesterly along said right of way line to the point of beginning.

TOGETHER WITH that part of said Government Lot 2, lying North of the above described tract, South of the original mean high water line and between the Northerly extension of the East and West side lines of the above described tract.

EXCEPTING THEREFROM those portions which were thereafter legally transferred to bona fide purchasers and as to which the defendant Kent Jones has no continuing interest, including any security interest.

7. All of that certain parcel of land located in Priest River, Bonner County, State of Idaho as follows:

PARCEL 1:

That portion of Sections 29 and 30, Township 56 North, Range 4 West, Boise Meridian, Bonner County, Idaho, described as follows:

From a point lying South 2 degrees 10' 23" West, 2417.36 feet (record South 00 degrees 51' West, 2419.65 feet) from the Northeast corner of Section 30, and said point being on the center line of B.P.A. Access Road No. AR-9-1; thence North 1

degree 01' 38" East, 17.23 feet (record North 00 degrees 51' East) to the North right of way of said access road and the true point of beginning; thence along said North right of way the following three (3) courses:

- 1) South 75 degrees 01' 34" East, 54.29 feet;**
- 2) North 89 degrees 42' 33" East, 109.02 feet;**
- 3) North 84 degrees 02' 07" East, 246.32 feet;**

thence South 34 degrees 58' 29" West, 30.10 feet to the South right of way of said access road; thence along the Southerly and Easterly right of way of said access road and the Westerly boundary of that parcel referred to in Instrument No. 179873, records of Bonner County, Idaho, the following five (5) courses:

- 1) North 79 degrees 01' 37" East, 108.23 feet;**
- 2) North 29 degrees 12' 51" East, 128.88 feet;**
- 3) North 11 degrees 02' 40" East, 131.12 feet;**
- 4) North 1 degree 16' 53" East, 228.50 feet;**

5) North 5 degrees 14' 28" East, 156.53 feet to the Northwest corner of the above said parcel; thence North 8 degrees 39' 35" West, 105.73 feet to a point on the West line of that parcel referred to in Instrument No. 220279, records of Bonner County, Idaho, and said point being on the Southerly right of way of said access road; thence along said South right of way the following three (3) courses:

- 1) North 48 degrees 06' 58" West, 750.35 feet;**
- 2) North 44 degrees 17' 07" West, 215.06 feet;**
- 3) North 81 degrees 32' 48" West, 418.69 feet;**

thence South 9 degrees 20' 58" West, 43.72 feet to the Northerly boundary of the State borrow pit;

thence following said boundary South 37 degrees 20' 34" East, 374.48 feet (record South 37 degrees 17' 30" East, 374.74 feet);

thence South 33 degrees 30' 59" West, 109.27 feet (record South 33 degrees 33' 15" West, 109.24 feet);

thence South 33 degrees 30' 41" West, 495.80 feet (record South 33 degrees 33' 15" West) to the Northerly edge of the slough;

thence along the edge of the slough South 27 degrees 15' 47" East, 298.04 feet to the Westerly boundary of that parcel referred to in Instrument No. 158543, records of Bonner County, Idaho;

thence along the Westerly boundary North 35 degrees 38' 30" East, 243.30 feet (record North 35 degrees 23' East, 243.08 feet) to the Northwest corner of said parcel;

thence South 51 degrees 53' 02" East, 470.61 feet (record South 52 degrees 06' East, 470.66 feet) to the Northeast corner of said parcel;

thence South 1 degree 02' 40" West, 252.73 feet (record South 00 degrees 51' West) to the true point of beginning.

PARCEL 2:

An easement for ingress and egress, as set forth in Document No. 425675, in and to that certain roadway as shown in Survey Instrument No. 375229.

SUBJECT TO that certain Deed of Trust wherein Kent A. Jones and Margo R. Jones, husband and wife, are the Grantors and J. Phillip Keyser and Texanna M. Keyser, husband and wife, are the Beneficiaries, dated July 25, 2000, recorded November 9, 2000 as Instrument No. 572591, which said Deed of Trust said Grantors will pay and retire according to the tenor thereof and shall hold Grantee herein harmless therefrom.

ALSO SUBJECT to easements, conditions, restrictions, reservation, and covenants, and rights of way of record.

B. **Bank Accounts/Investment Accounts/Management Accounts:** All funds received on behalf of, or credited to, bank accounts, investment accounts or management accounts, held in the United States or overseas, in which the said defendant has an interest, including but not limited to, the following bank accounts, investments and management accounts:

U.S. Bank
Ten Mile Properties
Acct. No. 1-535-9096-1014

U.S. Bank
Kent and Margo Jones
Acct. No. 1-535-0431-1843

Morgan Stanley/Dean Whitter
Kent and Margo Jones
Acct. No. 109-014628

U.S. Bank
Margo Jones
Acct. No. 2-536-0093-3084

U.S. Bank
Raptor View Estates, LLC
Acct. No.1-533-5220-5857

Panhandle State Bank
Kent Jones/J. Phillip Keyser
Acct. No. 4001977

C. **Conveyances:**

All right, title and interest in the following conveyances:

1. **2002 Ford Van**
VIN No. 1FDRE14L42HB27711

2. **2003 Toyota 4-Runner**
VIN No. JTEBU17RX30005696
3. **1995 White Shore Land'r Boat Trailer**
VIN No. 1MDCM3K17SE690427
4. **1997 Godfrey Marine 25' 00" Boat**
HIN: GDY4049SD797
6. **1994 Bombardier 15' 4" Boat**
HIN: ZZN07297F494

D. **Personal Property:**

1. Baseball card collections

E. **Business Property and Proceeds Thereof:**

All interests in any and all assets, investment accounts or equity in any of the following
businesses:

1. Ten Mile Properties
2. Kent Jones, LLC
3. Joe Brown's Carmel
4. Raptor View Estates, LLC
5. William Zanzinger Corp.
6. Kent and Margo Jones Revocable Trust
7. Johnson Wire Rope
8. Raptorview Estates Owners Association, Inc.

DEFENDANT MARK D. KITZMAN

A. **Real Property and Proceeds thereof:** All right, title and interest in land and appurtenances and improvements, including buildings and residences, and proceeds of sale thereof, more fully described below:

1. All of that certain parcel of land located at **2 Grouse Terrace, Lake Oswego, OR**, and more particularly described as:

Lot 1, Block 35, Mountain Park Blocks 35-41, in the City of Lake Oswego, Multnomah County, Oregon.

2. All of that certain parcel of land located at **1475 NW Galveston Ave., Bend, OR**, and more particularly described as:

Lots 7 and 8, Block 40, NORTHWEST TOWNSITE CO'S SECOND ADDITION TO BEND, Deschutes County, Oregon.

3. All of that certain parcel of land located at **1030 NE Parksedge Circle, Hillsboro OR**, and more particularly described as:

Lot 93, JONES FARM, in the County of Washington and State of Oregon, together with an access easement over Tracts "D" and "K" (private street).

4. All of that certain parcel of land located at **292 Pioneer Way, Roseburg/ Winchester, OR** and more particularly described as:

Beginning at a 3/4 inch iron pipe at the southwesterly corner of lot 4, Amended Plat of Rio Vista, Douglas County, Oregon; thence North 42° 23' West 125.08 feet to a 5/8 inch iron rod; thence North 49° 38' East 98.61 feet to a 5/8 inch iron rod; thence South 40° 08' East 125.00 feet to a 5/8 inch iron rod at the southeasterly corner thereof; thence South 49° 38' West along the right of way line of Pioneer Way 93.70 feet to the point of beginning, situated in Lot 4 Amended Plat of Rio Vista, in Section 25, Township 26 South, Range 6 West, Willamette Meridian, Douglas County, Oregon.

5. All of that certain timeshare interest with Consolidated Resorts, to include but not be limited to, any interest, timeshare or other, in the property located at **2575 S. Kihei Rd., Apt. 102, Kihei, HI.**

6. All of that certain parcel of land located at **4401 SW Stephenson Street, Portland, OR,** and more particularly described as:

Lots 33 and 34, Block 95, WEST PORTLAND PARK, in the City of Portland, County of Multnomah and State of Oregon.

B. **Bank Accounts/Investment Accounts/Management Accounts:** All funds received on behalf of, or credited to, bank accounts, investment accounts or management accounts, held in the United States or overseas, in which the said defendant has an interest, including but not limited to, the following bank accounts, investment and management accounts:

Bank of America
Mark Kitzman dba
Northwest New Tech
Acct. No. 28570-16994

Bank of Americ
Mark Kitzman dba
Northwest New Tech
Acct. No. 26659-17389

Bank of America
Mark D. Kitzman
Acct. No. 28669-12664

C. **Conveyances:**

All right, title and interest in the following conveyances:

1. **1999 Isuzu, VIN No. JACDJ58X8X7930743**
2. **1998 Mercedes-Benz 420, VIN No. WDBGA43G0WA402257, Plate No. 232BTB**

3. **1994 Bayliner Boat (23' 4"), Hull # USDA57SJE494**
4. **Boat slip No. C92 at Waverly Yacht Club, 600 SE Marion St., Portland, OR**
5. **1998 Ford Expedition, VIN #1FMPU18L8WLB97431**
6. **2002 Ford Expedition XLT, VIN #1FMPU16L02LA77359, Plate No. YRC439**
7. **1998 Mastercraft 20'7" Boat, VIN No. 19MB33T28W2000017, Hull #MBCUSAJ7F798, (registered to Joy Life)**

D. **Business Property and Proceeds Thereof:**

All interests in any and all assets, investment accounts or equity in any of the following businesses:

1. MDK Investments Properties, LLC
2. Northwest New Tech

DEFENDANT GREGORY SPEROW

A. **Real Property and Proceeds thereof:** All right, title and interest in land and appurtenances and improvements, including buildings and residences, and proceeds of sale thereof, more fully described below:

1. All that certain parcel of land located at **1433, 1433 ½ and 1435 Mount**

Pleasant Street, Los Angeles County, Los Angeles, CA:

Lot 27 of Tract No. 852, in the City of Los Angeles, County of Los Angeles, State of California, as per map recorded in Book 18, Pages 34 and 35 of Maps, in the Office of the County Recorder of said County.

APN: 5476-019-006.

2. All that certain parcel of land located at **7542 Jordan Ave., Canoga Park/Los Angeles, CA**, and more particularly described as follows:

The North 50 feet of the West 160 feet of Lot 2 in Block 21 of Owensmouth Tract, in the City of Los Angeles, County of Los Angeles, State of California, as per map recorded in Book 19 page 36 of Maps, in the office of the County Recorder of said County.

APN: 2111-003-007.

3. All that certain parcel of land located in the **County of State of Hawaii**, being **Parcel No. 9-2-011-015**, and more particularly described as follows:

All of that certain parcel of land situate at Kahuku, Ka'u, Island, County and State of Hawaii, being Lot Number 21 in Block Number 63, of the "Hawaiian Ocean View Estates," as shown on File Plan Number 738, filed in the Bureau of Conveyances of the State of Hawaii.

Together with an undivided 1/11,500 fee simple interest in and to all roadways located within the above-mentioned Subdivision, together with a perpetual nonexclusive easement-of-way in common with all other owners from time to time of lands therein, in, over, under and across all of said roadways, for all ingress, egress and utility purposes; provided, however, in the event it shall at any future time to be deemed desirable by the committee having control of the Road Maintenance Escrow Fund heretofore established to convey the said roadways or any portion of them to any proper governmental authority which shall undertake the maintenance of said roadways, the ownership and easements herein set forth shall, to the extent necessary be forthwith terminated, and the said Grantee herein does hereby irrevocably appoint said committee and its successors his attorney-in-fact to make such conveyance.

Subject to Reservation in favor of the State of Hawaii of all mineral and metallic mines.

Subject to Restrictive Covenants and Conditions contained in Deed dated September 7, 1973, recorded in Liber 9551 at Page 48.

4. All that certain parcel of land located at **Santa Rosa Creek Road, Adelaide, California**, consisting of approximately 88.8 acres, being Parcel No. 014-192-015 (formerly Parcel No. 014-191-038), and more particularly described as follows:

PARCEL 1:

The Northwest quarter of the Southwest quarter of Section 28, in Township 27 South, Range 10 East, Mount Diablo Base and Meridian, in the County of San Luis Obispo, State of California, according to the official plat of said land approved by the Surveyor General on January 30, 1880.

PARCEL 2:

Parcel A of Parcel Map COAL 75-366, in the County of San Luis Obispo, State of California, according to map recorded October 4, 1976 in Book 20, Page 96 of Parcel Maps, in the office of the County Recorder of said County, and Certificate of Correction recorded January 24, 1977 in Book 1951, Page 616 of Official Records.

EXCEPTING therefrom all minerals in and to that portion of Parcel A, lying within the East one-half of the Northwest quarter of Section 28, Township 27 South, Range 10 East, Mount Diablo Base and Meridian, as reserved by Beny Bianchi and Emilia Bianchi, in deed dated August 17, 1920 and recorded in Book 140, Page 161 of Deeds.

APN: 014-192-015

5. All that certain parcel of land located at **4914 Range View Ave., Los Angeles, CA**, and more particularly described as:

Lot 139 of Highlands Park Heights, Addition No. 1 as per Map recorded in Book 9, Page 116 of Maps, in the Office of the County Recorder of Los Angeles County, California.

6. All that certain parcel of land located at **651 Ventu Park Road, Ventura County, Newbury Park, CA**, and more particularly described as:

PARCEL 1:

LOTS 72, 73, 74, 75, 76, 77, 78, 79, 80, 81 82, 83, 84, 85, 86 AND 87 OF BLOCK 49 OF VEN-TU PARK EXTENSION NO. 3, IN THE COUNTY OF VENTURA, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 12, PAGE 37 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

PARCEL 2:

LOTS 22, 26, 28, 32, 34, 36, 37, 38, 39 AND 40 OF BLOCK 47 OF VEN-TU PARK EXTENSION NO. 4, IN THE COUNTY OF VENTURA, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 13, PAGE 17 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

Parcel No. 673-0-240-170

7. For those certain parcels of land located at **Ave. J. And Trevor Ave., Lancaster, CA**, referred to as APNs 3132-015-009 and 3132-015-066 and more particularly described as:

THAT PORTION OF THE NORTH HALF OF THE NORTH HALF OF SECTION 22, TOWNSHIP 7 NORTH, RANGE 12 WEST, SAN BERNARDINO MERIDIAN, IN THE CITY OF LANCASTER, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, ACCORDING TO THE OFFICIAL PLAT OF SAID LAND, LYING EAST OF THE EASTERLY LINE OF THE SOUTHERN PACIFIC RAILROAD COMPANY'S RIGHT OF WAY 200 FEET WIDE.

EXCEPT THEREFROM THAT PORTION DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT INTHE SOUTHERLY LINE OF AVENUE "J" (60 FEET WIDE) DISTANT EASTERLY ALONG SAID SOUTHERLY LINE 280 FEET FROM THE

EASTERLY LINE OF THE SOUTHERN PACIFIC RAILROAD COMPANY'S RIGHT OF WAY, 200 FEET WIDE; THENCE SOUTHERLY PARALLEL WITH THE EASTERLY LINE OF SAID RIGHT OF WAY 370 FEET; THENCE WESTERLY PARALLEL WITH THE SOUTHERLY LINE OF AVENUE "J" 280 FEET TO THE EASTERLY LINE OF THE SOUTHERN PACIFIC RAILROAD COMPANY'S RIGHT OF WAY; THENCE NORTHERLY ALONG SAID EASTERLY LINE 370 FEET TO THE SOUTHERLY LINE OF AVENUE "J" THENCE EASTERLY ALONG SAID AVENUE 280 FEET TO THE POINT OF BEGINNING.

ALSO EXCEPT THEREFROM THAT PORTION DESCRIBED AS FOLLOWS:

BEGINNING AT THE NORTHEAST CORNER OF SAID SECTION; THENCE ALONG THE EASTERLY LINE OF SAID SECTION SOUTH 0° 36' 40" EAST 409.69 FEET; THENCE SOUTH 89° 23' 20" WEST 235.00 FEET; THENCE NORTH 0° 36' 40" WEST 411.51 FEET TO THE NORTHERLY LINE OF SAID SECTION; THENCE ALONG SAID NORTHERLY LINE NORTH 89° 50' 00" EAST 235.00 FEET TO THE POINT OF BEGINNING.

ALSO EXCEPT THEREFROM THAT PORTION DESCRIBED AS FOLLOWS:

BEGINNING AT THE NORTHEAST CORNER OF SAID SECTION 22; THENCE SOUTH 89° 50' 00" WEST ALONG THE NORTHERLY LINE OF SAID SECTION 450.01 FEET; THENCE SOUTH 0° 36' 40" EAST 241.67 FEET TO THE TRUE POINT OF BEGINNING; THENCE NORTH 89° 23' 20" EAST 215 FEET TO THE WESTERLY LINE OF THE LAND DESCRIBED IN THE DEED TO FRANK LORENZI RECORDED ON AUGUST 17, 1954, AS INSTRUMENT NO. 372, IN BOOK 45335, PAGE 95 OFFICIAL RECORDS; THENCE NORTH 0° 36' 40" WEST 210 FEET, MORE OR LESS, TO THE SOUTHERLY LINE OF THE NORTHERLY 30 FEET OF SAID SECTION; THENCE WESTERLY ALONG SAID SOUTHERLY LINE TO A LINE WHICH BEARS NORTH 0° 36' 40" WEST FROM THE TRUE POINT OF BEGINNING; THENCE SOUTH 0° 36' 40" EAST TO THE TRUE POINT OF BEGINNING.

**ALSO EXCEPT THEREFROM THAT PORTION
DESCRIBED AS FOLLOWS:**

**THE EASTERLY 235 FEET OF THE NORTH HALF OF
THE NORTH HALF OF SAID SECTION 22, TOWNSHIP 7
NORTH, RANGE 12 WEST, SAN BERNARDINO
MERIDIAN, ACCORDING TO THE OFFICIAL PLAT OF
SAID LAND, APPROVED BY THE SURVEYOR GENERAL
JUNE 19, 1856.**

EXCEPT THAT PORTION DESCRIBED AS FOLLOWS:

**BEGINNING AT THE NORTHEAST CORNER OF SAID
SECTION; THENCE ALONG THE EASTERLY LINE OF
SAID SECTION, SOUTH 0° 36' 40" EAST, A DISTANCE OF
409.69 FEET; THENCE SOUTH 89° 23' 20" WEST, A
DISTANCE OF 235 FEET; THENCE NORTH 0° 36' 40"
WEST, A DISTANCE OF 411.51 FEET TO THE
NORTHERLY LINE OF SAID SECTION; THENCE
EASTERLY ALONG SAID NORTHERLY LINE, NORTH
89° 50' 00" EAST, A DISTANCE OF 235 FEET TO THE
POINT OF BEGINNING.**

**EXCEPT THEREFROM THAT PORTION CONVEYED TO
THE CITY OF LANCASTER BY ROAD DEED DATED
12/9/1994 AND FILED IN DOCUMENT NO. 95-1227931.**

8. For that certain parcel of land located at the corner of **Saticoy and**

Deering, Canoga Park, County of Los Angeles, CA, and more particularly described as:

**The West 100 feet of Lot 4 in Block 7 of Owensmouth, in the
City of Los Angeles, County of Los Angeles, State of
California, as per map recorded in Book 19 Page 36 of Maps,
in the office of the County Recorder of said County.**

APN: 2109-031-013

9. For those certain three parcels of land located in Mendocino County,

California, being Parcel Nos. 0270414500, 027041460, and 0270414700 in the name of

Silverado Custom Homes, LLC, and more particularly described as follows:

APN: 027-041-45

TRACT ONE:

Parcel 3 as numbered and designated upon the Parcel Map filed on October 30, 1989 in Map Case 2, Drawer 49, Pages 56 and 57, Mendocino County records.

TRACT TWO:

A non-exclusive easement for ingress and egress, 25 feet in width, lying 12 ½ feet on either side of the centerline of the existing road which extends from the South side of Port Road in a generally Southerly direction in the approximate location of the “25' wide roadway and public utility easement” as shown on the Parcel Map recorded June 17, 1991, in Map Case 2, Drawer 53, Pages 64 and 65, Mendocino County Records, to a point near the South line of Parcel 1 of said map; thence in a generally Westerly and Northwesterly direction adjacent to Arena Creek to the North line of said Parcel 1.

APN: 027-041-46, 47

TRACT ONE:

Parcels 1 & 2, as shown on that certain map entitled “Parcel Map #07-90 which map was filed for record in the office of the recorder of the County of Mendocino on June 17, 1991 in Map Case 2, Drawer 53, Pages 64 and 65, Mendocino County Records.

TRACT TWO:

Non-exclusive easement for roadway and public utility purposes as shown on the hereinabove referred to map.

10. Those certain parcels of land known as PN Nos. 23 S 12 W 03 1700 and 23 S 12 W 04 D 1800 in Lakeside, OR in the name of Silverado Custom Homes, LLC:

That portion of SE 1/4 of the SE 1/4 of Section 4, Township 23 South, Range 12 West of the Willamette Meridian, Coos County, Oregon, described as follows: Beginning at the Northeast corner of the SE 1/4 of the SE 1/4 of said Section 4; thence West 675.38 feet along the North line of said SE 1/4 of the SE 1/4 to the true point of beginning; thence along the adjusted line South 3.43 feet, more or less, to a 5/8 inch iron

rod; thence South 1° 54' 40" West 161.72 feet to a 5/8 inch iron rod in the centerline of an existing gravel road; thence South 16° 18' 33" East 93.30 feet to a 5/8 inch iron rod; thence South 13° 56' 59" East 187.96 feet to a 5/8 inch iron rod; thence continuing South 13° 56' 59" East 91.6 feet, more or less, to the normal high water line of Ten Mile Lake; thence South to the South line of said SE 1/4 of the SE 1/4 of Section 4; thence West along said South line to the Southwest corner of the SE 1/4 of the SE 1/4 of said Section 4; thence North along the West line of said SE 1/4 of the SE 1/4 to the Northwest corner of the SE 1/4 of the SE 1/4; thence East along the North line of said SE 1/4 of the SE 1/4 to the true point of beginning.

ALSO: A parcel of land lying in the NE 1/4 of the SE 1/4 of Section 4, Township 23 South, Range 12 West of the Willamette Meridian, Coos County, Oregon, being a portion of that tract of land described in deed to Robert T. and Agnes Ewen, recorded in Book 280, Page 170, Deed Records of Coos County, Oregon, described as follows: Beginning at the Southeast corner of the NE 1/4 of the SE 1/4 of said Section 4; thence following the South line of said NE 1/4 of the SE 1/4 West 912.81 feet, more or less, to the Southeast corner of the tract to be conveyed and the true point of beginning; thence West 227.19 feet, more or less, to the East shore of North Ten Mile Lake; thence following said shore line North 50° 59' 44" East 176.55 feet, more or less; thence South 39° 00' 16" East 142.99 feet, more or less, to the true point of beginning.

11. All of that certain parcel of land located at 7102 Silverhorn Dr., Evergreen, CO, and more particularly described as:

All that real property together with improvements, if any, situate, lying and being in the County of Jefferson, and State of Colorado, described as follows:

Lot 29, Evergreen Highlands, Unit 4, County of Jefferson, State of Colorado.

APN: 51-251-02-018

12. All of that certain parcel of land located at 34284 Rock Creed Rd., Pine, CO, and more particularly described as:

Lot 65, Block 2, Elk Falls Subdivision, Jefferson County, CO.

B. **Bank Accounts/Investment Accounts/Management Accounts:** All funds received on behalf of, or credited to, bank accounts, investment accounts or management accounts, held in the United States or overseas, in which the said defendant has an interest, including but not limited to, the following bank accounts, investment and management accounts:

1. Wells Fargo Bank
Sperow Family Trust/Geneva Redwood
Account No. 0369229836
Investment Account No. 6702248276
2. Comerica Bank
Geneva Redwood/Gregory Sperow
Account No. 8828209240
3. Union Bank of California
Greg Westbrook
dba Maxair Aviation
Account No. 4110010562
4. Union Bank of California
Max Bucher
dba Maxair Aviation
Account No. 4110005372
5. Wedbush Morgan Securities
Greg Sperow
Account Nos. 160-141755-619 and 7746-8258
6. Silverado Custom Homes
Dale Barker
Account No. 22001044

C. **Conveyances:**

All right, title and interest in the following conveyances:

1. 1933 Ford Coupe Roadster, California license 3KYB406, VIN 411763, registered owner Leonard Marks;

2. 1965 Cessna U206 aircraft, serial number U2060332, registration number N2132F, registered owners Wirt and Jean Cunningham;
3. 1968 Cessna 182M aircraft, serial number 18259417, registration number N70915; registered owner Gregory Westbrook; and
4. 1995 Chevrolet Tahoe, California license 3PHC820, VIN 1GNEK13K3SJ463189.

D. **Personal Property**

1. A Packard Bell computer (Serial #TGNN45035876) and related floppy disks;
2. Western Digital Enhance IDE hard drive (10.2 GB), serial number WMAOM 357 3446;
3. \$30,000 in United States currency; and
4. \$7,800 in United States currency.

E. **Business Property and Proceeds Thereof:**

1. New Tech Construction and Development, Inc.
2. Max Air Aviation
3. MIA, Inc. (formerly known as NT-GWB, Inc.)
4. Ponderosa Custom Homes, LLC
5. Sperow Family Trust
6. Weitzman Sperow America WO
7. Silverado Custom Homes
8. Libra Air Parts
9. Carribean Resource Group
10. Western European Enterprises

ALL DEFENDANTS

If any of the properties and interests described above as being subject to forfeiture, as a result of any action or omission of the defendant:

1. Cannot be located upon the exercise of due diligence;
2. Has been transferred or sold to, or deposited with, a third person;
3. Has been placed beyond the jurisdiction of the court;
4. Has been substantially diminished in value; or
5. Has been commingled with other property which cannot be subdivided

without difficulty; it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the said defendants up to the value of the forfeitable properties and interest herein, including but not limited to, all the property referred to herein to the extent of any interests of the defendants which do not constitute proceeds of drug and money laundering violations, or are not otherwise forfeitable pursuant to 21 U.S.C. §§ 848 and 853.

All pursuant to Title 21, United States Code, Section 853.

COUNT SIX

Drug Forfeiture

(Vio. 21 U.S.C. § 853)

As a result of the violations of Title 21, United States Code, Sections 841, 843(b), 846, 848, 952, 960, and 963, as charged in the indictment, the defendants, **KENT JONES, GREG SPEROW, MARK KITZMAN, GERALD MCDONALD, HAROLD BALLENGER, DENNIS HAMMONS, JEROD LEE KEYSER, ROBERT LONG, MARK ALDERS, DAMON MARSH, MARK PURSLEY, and RAY NORRIS**, shall forfeit to the United States

any and all property, real and personal, tangible and intangible, consisting or derived from any proceeds the said defendants obtained directly or indirectly as a result of the foregoing offenses; and any and all property, real and personal, tangible and intangible, used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the foregoing offenses; as to which property the defendants are jointly and severally liable; these interests include, but are not limited to, the defendants' interests in the property which is described in Count Five, including substitute assets, which is re-alleged and incorporated herein, and including the following:

ALL DEFENDANTS

Cash Proceeds: At least \$20 million in United States currency and all interest and proceeds traceable thereto, in that such sum in aggregate is property which constituted proceeds of the charged offenses, or was received in exchange for the distribution of controlled substances, and was subsequently expended, spent, distributed or otherwise disposed of by the defendants, and as to which the defendants are jointly and severally liable.

DEFENDANT ROBERT D. LONG

A. **Real Property and Proceeds thereof:** All right, title and interest in land and appurtenances and improvements, including buildings and residences, and proceeds of sale thereof, more fully described below:

1. All of that certain parcel of land located at 2393 Todd St., Eugene, OR, and more particularly described as:

Lot 27, Parkwood Subdivision, Lane County, Oregon, Parcel No. 1197472.

All pursuant to Title 21, United States Code, Section 853.

COUNT SEVEN

Money Laundering Forfeiture

(Vio. 18 U.S.C. § 982)

As a result of the violations of 18 USC 1956(h), as charged in the indictment, the defendants, **KENT JONES, GREG SPEROW, MARK KITZMAN, GERALD MCDONALD, JEROD LEE KEYSER, MARK ALDERS** and **DALE BARKER** shall forfeit to the United States any and all property, real and personal, involved in the aforesaid violations and all property traceable to such property, including the real and personal property items set out in Count Five, above, which is re-alleged and incorporated herein, as to which property the said defendants are jointly and severally liable, including, but not limited to, the following:

ALL DEFENDANTS

Cash Proceeds: At least \$20 million in United States currency and all interest and proceeds traceable thereto, in that such sum in aggregate is property which constituted proceeds of the charged offenses, or was received in exchange for the distribution of controlled substances, and was subsequently expended, spent, distributed or otherwise disposed of by the defendants, and as to which the defendants are jointly and severally liable.

ALL DEFENDANTS

If any of the properties and interests described above as being subject to forfeiture, as a result of any action or omission of the defendant:

1. Cannot be located upon the exercise of due diligence;
2. Has been transferred or sold to, or deposited with, a third person;
3. Has been placed beyond the jurisdiction of the court;
4. Has been substantially diminished in value; or
5. Has been commingled with other property which cannot be subdivided without difficulty; it is the intention of the United States, pursuant to Title 21, United States Code,

Section 853(p) and Title 18, United States Code, Section 982(b), to seek forfeiture of any other property of the said defendants up to the value of the forfeitable properties and interest herein, including but not limited to, all the property referred to herein to the extent of any interests of the defendants which do not constitute proceeds of drug and money laundering violations, or are not otherwise forfeitable pursuant to 21 U.S.C. § 853 and 18 U.S.C. § 982.

All pursuant to Title 18, United States Code, Section 982(a) and (b), and Title 21, United States Code, Section 853.

COUNT EIGHT

Money Laundering Forfeiture

(Vio. 18 U.S.C. § 981(a)(1)(C), 28 U.S.C. § 2461(c))

As a result of the violations of 18 USC 371, as charged in the indictment, the defendants, **KENT JONES, GREG SPEROW, MARK KITZMAN, GERALD MCDONALD, JEROD LEE KEYSER, MARK ALDERS** and **DALE BARKER** shall forfeit to the United States any and all property, real and personal, which constitutes or is derived from proceeds traceable to the aforestated violations, including the real and personal property items set out in Counts Five and Seven, above, including substitute assets, which is realleged and incorporated herein, as to which property the said defendants are jointly and severally liable, including, but not limited to, the following:

ALL DEFENDANTS

Cash Proceeds: At least \$20 million in United States currency and all interest and proceeds traceable thereto, in that such sum in aggregate is property which constituted proceeds of the charged offenses, or was received in exchange for the distribution of controlled

substances, and was subsequently expended, spent, distributed or otherwise disposed of by the defendants, and as to which the defendants are jointly and severally liable.

DATED this _____ day of June, 2006.

A TRUE BILL

/s/[Signature on Reverse]

FOREPERSON

THOMAS E. MOSS
United States Attorney by

MONTE J. STILES
Assistant United States Attorney

ANTHONY G. HALL
Assistant United States Attorney