

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES OF AMERICA,)	No. _____
)	
Plaintiff,)	COUNT ONE: All Defendants
v.)	21 U.S.C. §§ 841(a)(1)(b)(1)(A) and 846
)	NLT: 10 Years and NMT Life Imprisonment
GARLAND DUANE HANKINS,)	NMT \$4,000,000 Fine
[DOB: 12-01-1967],)	NLT: 5 Years Supervised Release
)	Class A Felony
JULIE ANN WEBER HANKINS,)	
[DOB: 04-21-1964],)	COUNT TWO: All Defendants
)	21 U.S.C. §§ 841(c)(1) and (2) and 846
STACEY MARIE WALKER,)	NMT 20 years imprisonment
[DOB: 03-29-1971],)	NMT \$250,000 Fine
)	NMT: 3 Years Supervised Release
TIMOTHY JAY GREATHOUSE,)	Class C Felony
[DOB: 04-27-1969],)	
)	COUNT THREE: Defendant Folsom
GINA LOUISE VIGLIATURO,)	21 U.S.C. §§ 841(c)(1)
[DOB: 04-06-1978],)	NMT 20 years imprisonment
)	NMT \$250,000 Fine
ROBERT BRUCE JAMESON,)	NMT: 3 Years Supervised Release
[DOB: 11-16-1962],)	Class C Felony
)	
KRISTI L. STEPHENSON,)	Allegations of Criminal Forfeiture, I and II
[DOB: 05-02-1972],)	21 U.S.C. §853
)	
BLAKE WILLIAM FOLSOM,)	\$100 Special Assessment for Counts 1, 2 and 3.
[DOB: 11-20-1967],)	
)	
HARLEY WILLIAM HARVEY, JR.,)	
[DOB: 01-06-1968],)	
)	
MINDY LYNN MORRIS,)	
[DOB: 01-03-1978],)	
)	
RYAN EDWARD BREIT,)	
[DOB: 07-07-1977])	
)	
Defendants.)	

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

That on or between January 1, 2005 and May 19, 2009, the exact dates unknown to the Grand Jury, in the Western District of Missouri and other places, Garland Duane Hankins, Julie Ann Weber Hankins, Stacey Marie Walker, Timothy Jay Greathouse, Gina Louise Vigliaturo, Robert Bruce Jameson, Kristi L. Stephenson, Blake William Folsom, Harley William Harvey, Jr., Mindy Lynn Morris and Ryan Edward Breit, defendants herein, did knowingly and intentionally combine, conspire, confederate and agree with each other and others, both known and unknown to the grand jury, to manufacture and distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in an amount of five-hundred (500) grams or more, contrary to the provisions of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A), all in violation of Title 21, United States Code, Section 846.

COUNT TWO

That on or between January 1, 2005 and May 19, 2009, the exact dates unknown to the Grand Jury, in the Western District of Missouri and other places, Garland Duane Hankins, Julie Ann Weber Hankins, Stacey Marie Walker, Timothy Jay Greathouse, Gina Louise Vigliaturo, Robert Bruce Jameson, Kristi L. Stephenson, Blake William Folsom, Harley William Harvey, Jr., Mindy Lynn Morris and Ryan Edward Breit, defendants herein, did knowingly and intentionally combine, conspire, confederate and agree with each other and others, both known and unknown to the grand jury, to possess a listed chemical, pseudoephedrine, with the intent to manufacture a controlled substance and possess and distribute a listed chemical, pseudoephedrine, knowing, or having reasonable cause to believe, that the listed chemical, pseudoephedrine, would be used to manufacture a controlled substance, contrary to the provisions of Title 21, United States Code, Section 841(c)(1) and (2), all in violation of Title 21, United States Code, Section 846.

COUNT THREE

That on or about April 3, 2007, in the Western District of Missouri, Blake William Folsom, defendant herein, did knowingly and intentionally possess a listed chemical, pseudoephedrine, with the intent to manufacture a controlled substance contrary to the provisions of Title 21, United States Code, Section 841(c)(1).

CRIMINAL FORFEITURE ALLEGATION I

The allegations contained in Counts 1 and 2 of this indictment are re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to the provisions of Title 21, United States Code, Sections 853(a)(1), 853(a)(2) and 853(p) and Title 18, United States Code, Section 982(a)(1) and Rule 32.2(a).

As a result of the commission of the violations charged in Counts 1 and 2 of this indictment, Harley Harvey, defendant herein, shall forfeit to the United States, pursuant to 21 USC Section 853, any and all property constituting or derived from any proceeds that the defendant obtained directly or indirectly as a result of the violations charged in Counts 1 and 2, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Counts 1 and 2 of this indictment, including but not limited to the following:

CURRENCY AND FINANCIAL INSTRUMENTS

1. \$23,323.00 U. S. Currency seized from the vehicle Harley Harvey was traffic stopped in on I-70 in Blue Springs, MO, on March 27, 2007;
2. \$35,800.00 U. S. Currency seized from the business premises of Harley Harvey in Blue Springs, MO, on June 14, 2007;

If the above-described forfeitable property, as a result of any act 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 said defendant up to the value of the above-described forfeitable property, all in violation of Title 21, United States Code, Sections 841 and 853.

CRIMINAL FORFEITURE ALLEGATION II

The allegations contained in Counts 1 and 2 of this indictment are re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to the provisions of Title 21, United States Code, Sections 853(a)(1), 853(a)(2) and 853(p) and Title 18, United States Code, Section 982(a)(1) and Rule 32.2(a).

As a result of the commission of the violations charged in Counts 1 and 2 of this indictment, **GARLAND D. HANKINS**, defendant herein, shall forfeit to the United States pursuant to 21 USC Section 853, any and all property constituting or derived from any proceeds that the defendant obtained directly or indirectly as a result of the violations charged in Counts 1 and 2, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Counts 1 and 2 of this indictment.

FORFEITURE MONEY JUDGEMENT

A sum of money equal to \$900,000 in United States currency, representing the amount of proceeds obtained as a result of the offenses alleged in Counts 1 and 2.

If the above-described forfeitable property, as a result of any act 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 said defendant up to the value of the above-described forfeitable property, all in violation of Title 21, United States Code, Sections 841 and 853, including but not limited to the following:

REAL PROPERTY

All lots or parcels of land, together with their buildings, appurtenances, improvements, fixtures, attachments and easements, at the addresses listed and described below:

500 S.E. 30th Street, Oak Grove, MO

That portion of the Southeast Quarter of the Northwest Quarter of Section 9, Township 48 North of Baseline, Range 29 West of the Fifth Principal Meridian, all in Jackson County, Missouri, being more particularly described as follows: Commencing at the Southeast corner of the Southeast Quarter of the Northwest Quarter of said Section 9, said point also being the center of said Section 9 thence along the South line of said Quarter Quarter Section South 89 degrees 58 minutes 00 Seconds West a distance of 651.60 feet to point on the Centerline of right-of-way of White Road, said point also being the true point of beginning, said point of

beginning being the Southeast corner of tract of record in Book I-1348 at page 1675 in the office of the Recorder for Jackson County, Missouri; thence continuing along said Quarter Quarter Section line , and along said Centerline of right-of-way South 89 degrees 58 Minutes 00 Seconds West a distance of 470.07 feet; thence leaving said Quarter Quarter section line, and said Centerline of right-of-way North 00 degrees 1 Minutes 28 Seconds East a distance of 1294.29 feet to a point on the North line of the Southeast Quarter of the Northwest Quarter of said Section 9; thence along said Quarter Quarter section line North 89 degrees 32 minutes 28 seconds east a distance of 467.29 feet; thence leaving said Quarter Quarter Section line along the East line of a tract of record in Book I-1348 at page 1675 in the office of the Recorder for Jackson County, Missouri, South 00 degrees 16 minutes 00 seconds West a distance of 1297.74 feet to the True Point of beginning except that part platted as Spokani Ridge.

Subject to Building Line, Easements, Restrictions and Conditions of Record, if any, and to any zoning law or ordinance affecting the herein described property.

All in violation of Title 21, United States Code, Section 853(a)(1) and (a)(2) and Title 18, United States Code, Section 982(a)(1) .

A TRUE BILL.

/s/ Georgia A. Young
FOREPERSON OF THE GRAND JURY

Dated: 5/19/09

/s/ Bruce Rhoades
Bruce Rhoades
Assistant United States Attorney