

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

UNITED STATES OF AMERICA,) No. _____
)
Plaintiff,)
) COUNT ONE: (Both Defendants)
) 21 U.S.C. §§ 846, 841(a)(1), and
v.) 841(b)(1)(A)
) NLT 10 Years; NMT Life Imprisonment
JAMES J. STROBBE,)
[DOB: █████/1968], and) NMT \$4,000,000 Fine
) NLT 5 Years Supervised Release
STEVEN EDWARD ALLEN,)
[DOB: █████/1970],) Class A Felony
)
Defendants.) COUNTS TWO, THREE, FOUR, SIX
) (Both Defendants)
) 21 U.S.C. §§ 841(a)(1), and
) 841(b)(1)(C); 18 U.S.C. § 2
) NMT Twenty Years Imprisonment
) NMT \$1,000,000 Fine
) NLT 3 Years Supervised Release
) Class C Felony
)
) COUNTS FIVE, SEVEN (Strobbe)
) 21 U.S.C. §§ 841(a)(1), and
) 841(b)(1)(C)
) NMT Twenty Years Imprisonment
) NMT \$1,000,000 Fine
) NLT 3 Years Supervised Release
) Class C Felony
)
) \$100 Special Assessment per count of
) conviction
)
) FORFEITURE ALLEGATIONS

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

Between on or about January 1, 2004, and on or about September 1, 2009, the exact dates being unknown to the Grand Jury, in Jackson County, in the Western District of Missouri, and elsewhere, defendants JAMES J. STROBBE and STEVEN EDWARD ALLEN, did knowingly conspire, confederate, and agree with each other, with Juan Diaz, a co-conspirator not indicted

herein, and with others both known and unknown to the Grand Jury, to distribute cocaine, a Schedule II Controlled Substance, in an amount of five kilograms and more, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);

OVERT ACTS

The following overt acts, among others, were committed by the conspirators in furtherance of the conspiracy:

- (1) Counts Two through Seven are incorporated herein as overt acts committed in furtherance of the conspiracy.
- (2) During the period of the charged conspiracy, Juan Diaz sold JAMES J. STROBBE approximately three-to-four ounces of cocaine per week, for a total of at least 250 (two-hundred, fifty ounces) of cocaine or about 7,000 (seven-thousand) grams of cocaine.
- (3) From 2004 to 2009, JAMES J. STROBBE sold approximately one ounce of cocaine per month to Douglas E. DeKock.
- (4) On or about July 29, 2009, JAMES J. STROBBE distributed cocaine to Douglas E. DeKock.
- (5) On or about July 28, 2009, JAMES J. STROBBE distributed approximately an ounce of cocaine.
- (6) On or about July 30, 2009, in Platte County, Missouri, JAMES J. STROBBE demanded and received payment of \$200 on a drug debt.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

On or about June 16, 2009, in Jackson County, in the Western District of Missouri, defendants JAMES J. STROBBE and STEVEN EDWARD ALLEN, aiding and abetting each other, did knowingly and intentionally distribute some amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and

841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT THREE

On or about July 24, 2009, in Clay County, in the Western District of Missouri, defendants JAMES J. STROBBE and STEVEN EDWARD ALLEN, aiding and abetting each other, did knowingly and intentionally distribute some amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FOUR

On or about August 5, 2009, in Platte County, in the Western District of Missouri, defendants JAMES J. STROBBE and STEVEN EDWARD ALLEN, aiding and abetting each other, did knowingly and intentionally distribute some amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FIVE

On or about August 12, 2009, in Platte County, in the Western District of Missouri, defendant JAMES J. STROBBE did knowingly and intentionally distribute some amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SIX

On or about August 19, 2009, in Clay County, in the Western District of Missouri, defendants JAMES J. STROBBE and STEVEN EDWARD ALLEN, aiding and abetting each other, did knowingly and intentionally distribute some amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT SEVEN

On or about August 19, 2009, in Platte County, in the Western District of Missouri, defendant JAMES J. STROBBE did knowingly and intentionally possess, with intent to distribute, some amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

FORFEITURE ALLEGATIONS

FORFEITURE ALLEGATION No. 1

The allegations contained in Counts One, Two, Four, Five, and Six of this Indictment are realleged and are incorporated herein by reference.

Upon conviction for any of these counts, defendant JAMES J. STROBBE shall forfeit to the United States any and all of his interest in any property which was used to facilitate the commission of such violation. In particular, defendant shall forfeit the following described property:

A 2001 Chevrolet Extended-Cab Pickup Truck, VIN 1GCEK19VX1E101622
All in violation of Title 21, United States Code, Section 853.

FORFEITURE ALLEGATION No. 2

The allegations contained in Counts One and Three of this Indictment are realleged and are incorporated herein by reference.

Upon conviction for any of these counts, defendant JAMES J. STROBBE shall forfeit to the United States any and all of his interest in any property which was used to facilitate the commission of such violation. In particular, defendant shall forfeit the following described property:

A 1998 Chevrolet Van, VIN 1GNDX03E9WD143218

All in violation of Title 21, United States Code, Section 853.

FORFEITURE ALLEGATION No. 3

The allegations contained in Count One of this Indictment are re-alleged and incorporated by reference for the purpose of alleging a forfeiture pursuant to the provisions of Title 21, United States Code, Section 853.

Defendant JAMES J. STROBBE, shall forfeit to the United States all property, real and personal, constituting and derived from any proceeds said defendant obtained directly and indirectly as a result of the violations incorporated by reference in this Count and all property used, or intended to be used, in any manner or part, to commit, and to facilitate the commission of the violations incorporated by reference in this Count, including but not limited to the following:

\$3,950 in United States Currency seized on August 19, 2009

All in violation of Title 21, United States Code, Section 853.

A TRUE BILL:

/s/ Constance E. Durrell
FOREPERSON OF THE GRAND JURY

/s/ Charles E. Ambrose, Jr.
Charles E. Ambrose, Jr.
Assistant United States Attorney

Dated: 12/1/09
Kansas City, Missouri