

SCANNED UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

U.S. DISTRICT COURT
DISTRICT OF MAINE
PORTLAND
RECEIVED & FILED

2018 OCT -5 P 3:45

UNITED STATES OF AMERICA

v.

**RICHARD DANIELS
a/k/a "Stitch"
JOHN VALDES
STEVEN GALLUCCI
TIMMY BELLMORE
BRIAN BILODEAU
TYLER POLAND
TIMOTHY VEILLEUX
MARK KILPATRICK
BRANDON KNUTSON
CALEB LABERGE
TY PROPERTIES, LLC
TY CONSTRUCTION, LLC
1830 LISBON ST., LLC
COMVEST, INC
MR, LLC
WILLIE MOE ENTERTAINMENT, INC.
TMB AUTO, LLC
YEHUDI PARDO
CHARLES CALIRI
BRIAN BILODEAU, LLC
DANIEL L. POLAND III
D.L.P. BUILDERS, LLC
SHAWNA BIELAWSKI**

DEPUTY CLERK

Docket No. 2:18-cr-63-GZS

SUPERSEDING INDICTMENT

The Grand Jury Charges:

**COUNT 1
(Conspiracy to Distribute Marijuana)**

Between about 2015 and February 27, 2018, within the District of Maine and elsewhere,

defendants

**RICHARD DANIELS
TIMMY BELLMORE
BRIAN BILODEAU
TYLER POLAND
TIMOTHY VEILLEUX
MARK KILPATRICK
BRANDON KNUTSON
CALEB LABERGE
1830 LISBON ST., LLC
COMVEST, INC
WILLIE MOE ENTERTAINMENT, INC.**

knowingly and intentionally conspired with each other and others known and unknown to manufacture, distribute, and possess with intent to distribute marijuana plants and marijuana, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that as to each defendant, their conduct as members of the conspiracy charged in Count One, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged in Count One, involved 100 or more marijuana plants and 100 kilograms or more of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(B).

COUNT 2
(Distribution of Marijuana)

On about August 24, 2017, within the District of Maine, defendant

RICHARD DANIELS

knowingly and intentionally distributed marijuana, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the penalty provisions of Title 21, United States Code, Section 841(b)(1)(D) apply to the conduct described herein.

COUNT 3
(Possession with Intent to Distribute Marijuana)

On about August 24, 2017, within the District of Maine, defendant

JOHN VALDES

knowingly and intentionally possessed with intent to distribute marijuana, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the penalty provisions of Title 21, United States Code, Section 841(b)(1)(D) apply to the conduct described herein.

COUNT 4
(Distribution of Marijuana)

On about September 29, 2017, within the District of Maine, defendant

RICHARD DANIELS

knowingly and intentionally distributed marijuana, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the penalty provisions of Title 21, United States Code, Section 841(b)(1)(D) apply to the conduct described herein.

COUNT 5
(Possession with Intent to Distribute Marijuana)

On about September 29, 2017, within the District of Maine, defendant

JOHN VALDES

knowingly and intentionally possessed with intent to distribute marijuana, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the penalty provisions of Title 21, United States Code, Section 841(b)(1)(D) apply to the conduct described herein.

COUNT 6
(Distribution of LSD)

On about October 6, 2017, within the District of Maine, defendant

RICHARD DANIELS

knowingly and intentionally distributed lysergic acid diethylamide (LSD), in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the penalty provisions of Title 21, United States Code, Section 841(b)(1)(C) apply to the conduct described herein.

COUNT 7
(Distribution of Marijuana)

On about February 8, 2018, within the District of Maine, defendant

RICHARD DANIELS

knowingly and intentionally distributed marijuana, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the penalty provisions of Title 21, United States Code, Section 841(b)(1)(D) apply to the conduct described herein.

COUNT 8
(Possession with Intent to Distribute Marijuana)

On about February 8, 2018, within the District of Maine, defendant

STEVEN GALLUCCI

knowingly and intentionally possessed with intent to distribute marijuana, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the penalty provisions of Title 21, United States Code, Section 841(b)(1)(D) apply to the conduct described herein.

COUNT 9
(Possession with Intent to Distribute Marijuana)

On about February 27, 2018, within the District of Maine, defendant

RICHARD DANIELS
a/k/a "Stitch"

knowingly and intentionally possessed with intent to distribute more than 50 kilograms of marijuana, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the penalty provisions of Title 21, United States Code, Section 841(b)(1)(C) apply to the conduct described herein.

COUNT 10
(Manufacturing a Controlled Substance)

Beginning on a date unknown, and continuing until February 27, 2018, within the District of Maine, defendant

RICHARD DANIELS
a/k/a "Stitch"

knowingly and intentionally manufactured a substance containing marijuana, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the penalty provisions of Title 21, United States Code, Section 841(b)(1)(C) apply to the conduct described herein.

COUNT 11
(Manufacturing a Controlled Substance)

On about February 27, 2018, within the District of Maine, defendant

TIMMY BELLMORE

knowingly and intentionally manufactured more than 100 marijuana plants, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the penalty provisions of Title 21, United States Code, Section 841(b)(1)(B) apply to the conduct described herein.

COUNT 12
(Manufacturing a Controlled Substance)

On about February 27, 2018, within the District of Maine, defendants

BRIAN BILODEAU
MR, LLC

knowingly and intentionally manufactured more than 100 marijuana plants, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the penalty provisions of Title 21, United States Code, Section 841(b)(1)(B) apply to the conduct described herein.

COUNT 13
(Possession with Intent to Distribute Marijuana)

On about February 27, 2018, within the District of Maine, defendant

BRIAN BILODEAU

knowingly and intentionally possessed with intent to distribute more than 50 kilograms of marijuana, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the penalty provisions of Title 21, United States Code, Section 841(b)(1)(C) apply to the conduct described herein.

COUNT 14

(Possession of a Firearm in Furtherance of Drug Trafficking)

On about February 27, 2018, within the District of Maine, defendant

BRIAN BILODEAU

knowingly and intentionally possessed a Beretta, model BU9 Nano, 9mm pistol, bearing serial number NU111403, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely the offense described in Count 1 of this Indictment.

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 15

(Manufacturing a Controlled Substance)

On about February 27, 2018, within the District of Maine, defendants

**TYLER POLAND
TY PROPERTIES, LLC**

knowingly and intentionally manufactured more than 100 marijuana plants, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the penalty provisions of Title 21, United States Code, Section 841(b)(1)(B) apply to the conduct described herein.

COUNT 16

(Possession with Intent to Distribute MDMA)

On about February 27, 2018, within the District of Maine, defendant

TYLER POLAND

knowingly and intentionally possessed with intent to distribute a mixture or substance containing 3,4 methylenedioxymethamphetamine ("MDMA" or "Ecstasy"), in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the penalty provisions of Title 21, United States Code, Section 841(b)(1)(C) apply to the conduct described herein.

COUNT 17
(Possession with Intent to Distribute Alprazolam)

On about February 27, 2018, within the District of Maine, defendant

TYLER POLAND

knowingly and intentionally possessed with intent to distribute a mixture or substance containing alprazolam, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the penalty provisions of Title 21, United States Code, Section 841(b)(2) apply to the conduct described herein.

COUNT 18
(Possession with Intent to Distribute Marijuana)

On about February 27, 2018, within the District of Maine, defendant

TYLER POLAND

knowingly and intentionally possessed with intent to distribute more than 50 kilograms of marijuana, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the penalty provisions of Title 21, United States Code, Section 841(b)(1)(C) apply to the conduct described herein.

COUNT 19
(Attempted Possession with Intent to Distribute Marijuana)

On about February 25, 2018, within the District of Maine, defendant

YEHUDI PARDO

knowingly and intentionally attempted to possess with intent to distribute marijuana, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the penalty provisions of Title 21, United States Code, Section 841(b)(1)(D) apply to the conduct described herein.

COUNT 20
(Possession with Intent to Distribute Marijuana)

On about February 21, 2018, within the District of Maine, defendant

CHARLES CALIRI

knowingly and intentionally possessed with intent to distribute marijuana, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the penalty provisions of Title 21, United States Code, Section 841(b)(1)(D) apply to the conduct described herein.

COUNT 21
(Maintaining a Drug Involved Premises)

Beginning on a date unknown, but no later than June 2017, and continuing until February 27, 2018, within the District of Maine, defendant

TIMOTHY VEILLEUX

did unlawfully and knowingly use and maintain a place located at 97 Fourth Street, Lewiston, Maine, for the purpose of distributing and manufacturing marijuana, in violation of Title 21, United States Code, Section 856(a)(1).

It is further alleged that the penalty provisions of Title 21, United States Code, Section 856(b) apply to the conduct described herein.

COUNT 22
(Maintaining a Drug Involved Premises)

Beginning on a date unknown, but no later than November 2017, and continuing until February 27, 2018, within the District of Maine, defendant

TY PROPERTIES, LLC

did unlawfully and knowingly use and maintain a place located at 249 Merrow Road, Auburn, Maine, for the purpose of distributing and manufacturing marijuana, in violation of Title 21, United States Code, Section 856(a)(1).

It is further alleged that the penalty provisions of Title 21, United States Code, Section 856(b) apply to the conduct described herein.

COUNT 23
(Maintaining a Drug Involved Premises)

Beginning on a date unknown, but no later than June 2015, and continuing until February 27, 2018, within the District of Maine, defendant

1830 LISBON ST., LLC

did unlawfully and knowingly use and maintain a place located at 1830 Lisbon Street, Lewiston, Maine, for the purpose of distributing and manufacturing marijuana, in violation of Title 21, United States Code, Section 856(a)(1).

It is further alleged that the penalty provisions of Title 21, United States Code, Section 856(b) apply to the conduct described herein.

COUNT 24
(Maintaining a Drug Involved Premises)

Beginning on a date unknown, but no later than June 2017, and continuing until February 27, 2018, within the District of Maine, defendant

COMVEST, INC.

did unlawfully and knowingly use and maintain a place located at 17 Bridge Street, Lewiston, Maine, for the purpose of distributing and manufacturing marijuana, in violation of Title 21, United States Code, Section 856(a)(1).

It is further alleged that the penalty provisions of Title 21, United States Code, Section 856(b) apply to the conduct described herein.

COUNT 25
(Maintaining a Drug Involved Premises)

Beginning on a date unknown, but no later than November 2016, and continuing until February 27, 2018, within the District of Maine, defendant

MR, LLC

did unlawfully and knowingly use and maintain a place located at 230 Merrow Road, Auburn, Maine, for the purpose of distributing and manufacturing marijuana, in violation of Title 21, United States Code, Section 856(a)(1).

It is further alleged that the penalty provisions of Title 21, United States Code, Section 856(b) apply to the conduct described herein.

COUNT 26
(Maintaining a Drug Involved Premises)

Beginning on a date unknown, but no later than June 2017, and continuing until February 27, 2018, within the District of Maine, defendant

WILLIE MOE ENTERTAINMENT, INC.

did unlawfully and knowingly use and maintain a place located at 29 Avon Street, Lewiston, Maine, for the purpose of distributing and manufacturing marijuana, in violation of Title 21, United States Code, Section 856(a)(1).

It is further alleged that the penalty provisions of Title 21, United States Code, Section 856(b) apply to the conduct described herein.

COUNTS 27-29
(Money Laundering)

On about the dates set forth below, in the District of Maine and elsewhere, defendants

TIMMY BELLMORE
TMB AUTO, LLC

knowingly conducted and attempted to conduct the following financial transactions affecting interstate and foreign commerce, which involved the proceeds of specified unlawful activity, that is conspiracy to distribute and possess with intent to distribute controlled substances as charged in Count 1 of this Superseding Indictment, knowing that the transactions were 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, and that while conducting and attempting to conduct such financial transactions, defendant knew that the property involved in the financial transactions, represented the proceeds of some form of unlawful activity.

COUNT	DATE	NATURE OF FINANCIAL TRANSACTION	APPROXIMATE DOLLAR AMOUNT
27	2/23/2017	Cash payment to Tea Room, LLC towards purchase of 57 Fair Street, Lewiston, Maine	\$20,000
28	7/6/2017	Cash payment to Tea Room, LLC towards purchase of 57 Fair Street, Lewiston, Maine	\$25,000
29	9/10/2017	Cash payment to Tea Room, LLC towards purchase of 57 Fair Street, Lewiston, Maine	\$20,000

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNT 30
(Money Laundering Conspiracy)

Beginning on about November 15, 2016, and continuing through about July 10, 2017, in the District of Maine and elsewhere, defendants

BRIAN BILODEAU
MR, LLC

did knowingly combine, conspire, and agree with each other and with other persons known and unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, namely to conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which involved the proceeds of specified unlawful activity, that is the unlawful cultivation and distribution of marijuana, with the intent to promote the carrying on of specified unlawful activity, that is the unlawful cultivation and distribution of marijuana, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity.

MANNER AND MEANS

The manner and means used to accomplish the objectives of the conspiracy included, among others, the following financial truncations in connection with the purchase of real property located at 230 Merrow Road, Auburn, Maine:

DATE (on or about)	NATURE OF FINANCIAL TRANSACTION	APPROXIMATE DOLLAR AMOUNT
11/15/2016	Cash payment to Person A relating to 230 Merrow Road, Auburn	\$50,000
12/15/2017	Cash payment to Person A relating to 230 Merrow Road, Auburn	\$50,000
1/15/2017	Cash payment to Person A relating to 230 Merrow Road, Auburn	\$50,000
2/15/2017	Cash payment to Person A relating to 230 Merrow Road, Auburn	\$50,000
3/15/2017	Cash payment to Person A relating to 230 Merrow Road, Auburn	\$50,000
4/15/2017	Cash payment to Person A relating to 230 Merrow Road, Auburn	\$50,000
5/15/2017	Cash payment to Person A relating to 230 Merrow Road, Auburn	\$50,000
6/15/2017	Cash payment to Person A relating to 230 Merrow Road, Auburn	\$50,000
7/10/2017	Cash payment to Person A relating to 230 Merrow Road, Auburn	\$50,000

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 1956(h).

COUNTS 31-34
(Illegal Monetary Transactions)

On about the dates set forth below, in the District of Maine and elsewhere, defendant

BRIAN BILODEAU
BRIAN BILODEAU, LLC

did knowingly engage and attempt to engage in a monetary transaction by through or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, that is a deposit of monetary instruments to the Androscoggin Bank account in the name of Brian Bilodeau LLC ending in 8713, such property having been derived from a specified unlawful activity, that is conspiracy to distribute and possess with intent to distribute controlled substances as charged in Count 1 of this Superseding Indictment:

COUNT	DATE	NATURE OF FINANCIAL TRANSACTION	APPROXIMATE DOLLAR AMOUNT
31	3/27/2017	Deposited check 1040 from CPA	\$12,500.00
32	6/26/2017	Deposited check 1125 from CPA	\$12,500.00
33	9/26/2017	Deposited check 1042 from CPA	\$12,500.00
34	12/28/2017	Deposited check 1001 from CPA	\$12,500.00

All in violation of Title 18, United States Codes, Sections 1957 and 2.

COUNT 35
(Money Laundering)

On about November 22, 2017, in the District of Maine and elsewhere, defendant

TYLER POLAND
TY PROPERTIES, LLC

knowingly conducted and attempted to conduct a financial transaction affecting interstate and foreign commerce, specifically a cash payment of \$200,000 to Company A and Person A, which involved the proceeds of specified unlawful activity, that is conspiracy to distribute and possess

with intent to distribute controlled substances as charged in Count 1 of this Superseding Indictment, knowing that the transactions were 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, and that while conducting and attempting to conduct such financial transactions, defendant knew that the property involved in the financial transactions, represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNT 36
(Destruction or Removal of Property to Prevent Search or Seizure)

On about February 27, 2018, in the District of Maine and elsewhere, defendant

TYLER POLAND
TY CONSTRUCTION, LLC

before the search for and seizure of property by IRS Special Agent Stacey Martin, a person authorized to make such search and seizure, did knowingly destroy, damage, waste, dispose of, transfer, or otherwise took action, for the purpose of preventing or impairing the Government's lawful authority to take such property into its custody or control or to continue holding such property under its lawful custody and control, specifically, he transferred \$220,000 from TD Bank account ending in 7379, of which he was the sole authorized signer on the account, to an account at another bank held in the name of a company owned by his father.

All in violation of Title 18 United States Code, Section 2232(a) and 2.

COUNT 37
(False Statement)

On about May 23, 2018, within the District of Maine, defendant

DANIEL L. POLAND III
D.L.P. BUILDERS, INC.

did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States. Specifically, in connection with a forfeiture proceeding pending before the Internal Revenue Service, Defendant submitted a Seized Asset Claim Form and signed under penalty of perjury indicating “that my claim to this property that the information provided in support of my claim is true and correct to the best of my knowledge and belief,” when as Defendants then and there knew, the claim was false and the information provided to the Internal Revenue Service did not in full represent labor and material costs incurred by D.L.P. Builders, Inc., for a construction project.

In violation of Title 18, United States Code, Sections 1001(a)(2) and 2.

COUNT 38
(False Statement)

On about July 9, 2018, within the District of Maine, defendant

DANIEL L. POLAND III
D.L.P. BUILDERS, INC.

did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States. Specifically, in connection with a forfeiture proceeding pending before the Internal Revenue Service, Defendants submitted a document titled “revised Bill as of July 6, 2018” along with attachments which Defendants then and there knew was false and the

information provided to the Internal Revenue Service did not in full represent labor and material costs incurred by D.L.P. Builders, Inc., for a construction project.

In violation of Title 18, United States Code, Sections 1001(a)(2) and 2.

COUNT 39
(Perjury)

On about March 2, 2018, in the District of Maine, defendant

SHAWNA BIELAWSKI

having taken an oath to testify truthfully in a proceeding before the United States District Court for the District of Maine, unlawfully, willfully, knowingly, and contrary to such oath, did make false material declarations, that is, she gave the following underlined false testimony:

Q. Have you ever seen marijuana in his house?

A. Medical marijuana, yes.

Q. Have you ever seen more than a pound of marijuana in his house?

A. No.

Q. Have you ever helped him sell dabs?

A. No.

Q. You've never delivered dabs to any other person at his request?

A. No.

Q. You're sure about that under oath?

A. I'm positive.

In violation of Title 18, United States Code, Section 1623(a).

COUNTS 40-41
(Illegal Monetary Transactions)

On about the dates set forth below, in the District of Maine and elsewhere, defendants

TYLER POLAND
TY CONSTRUCTION, LLC

did knowingly engage and attempt to engage in a monetary transaction by through or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, that is a deposit of monetary instruments to the TD Bank account in the name of TY Construction, LLC, ending in 7379, such property having been derived from a specified unlawful activity, that is conspiracy to distribute and possess with intent to distribute controlled substances as charged in Count 1 of this Superseding Indictment:

COUNT	DATE	NATURE OF FINANCIAL TRANSACTION	APPROXIMATE DOLLAR AMOUNT
36	9/5/2017	Deposited check 9197 from D.B. and check 164 from W.G.	\$30,000.00
37	11/28/2017	Deposited check 3207 from D.B. and check 173 from W.G.	\$20,000.00

All in violation of Title 18, United States Codes, Sections 1957 and 2.

FORFEITURE ALLEGATION #1

Upon conviction of one or more of the controlled substance offenses alleged in Counts 1-26 of this Superseding Indictment, defendants

**RICHARD DANIELS
JOHN VALDES
TIMMY BELLMORE
BRIAN J. BILODEAU
TYLER POLAND
TIMOTHY VEILLEUX
MARK KILPATRICK
CHARLES CALIRI
YEHUDI PARDO
DANIEL L. POLAND III
D.L.P. BUILDERS, LLC
TY PROPERTIES, LLC
BRIAN BILODEAU, LLC
1830 LISBON ST., LLC
TMB AUTO, LLC
COMVEST, INC**

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds said defendants obtained directly or indirectly as a result of the violations alleged in this Indictment, 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, including but not limited to each defendant's interest in the following:

a. Non-Real Property:

ASSET ID	ASSET DESCRIPTION	Date Seized
18-DEA-638943	\$16,370.00 U.S. Currency seized in Auburn, Maine	2/27/2018
18-DEA-638944	\$140,000.00 U.S. Currency seized in Auburn, Maine	2/27/2018
18-DEA-638947	\$2,572.25 U.S. Currency seized in Lewiston, Maine	2/27/2018
18-DEA-638948	\$30,020.00 U.S. Currency seized in Lewiston, Maine	2/27/2018
18-DEA-638949	\$20,000.00 U.S. Currency seized in Lewiston, Maine	2/27/2018
18-DEA-638950	\$10,421.00 U.S. Currency seized in Lewiston, Maine	2/27/2018

ASSET ID	ASSET DESCRIPTION	Date Seized
18-DEA-638952	\$1,265.25 U.S. Currency seized in Lewiston, Maine	2/27/2018
18-DEA-638953	\$95,010.00 U.S. Currency seized in Lewiston, Maine	2/27/2018
18-DEA-639293	Tag Heuer Carrera Calibre 1887 Watch seized in Auburn, Maine – estimated value \$1,250	2/27/2018
18-DEA-639295	Breitling 1884 Super Avenger Mens Watch seized in Lewiston, Maine – estimated value \$2,250	2/27/2018
18-DEA-639296	Rolex Oyster Perpetual GMT Master II Date Watch seized in Lewiston, Maine - estimated value \$6,500	2/27/2018
18-DEA-639297	Rolex Oyster Perpetual Daytona Mens Gold Watch seized in Lewiston, Maine – estimated value \$21,500	2/27/2018
18-DEA-639298	Rolex Oyster Perpetual Day-Date Mens Gold Watch seized in Lewiston, Maine – estimated value \$9,000	2/27/2018
18-DEA-639299	Rolex Oyster Perpetual Yacht-Master II Mens Watch seized in Lewiston, Maine - \$12,325	2/27/2018
18-DEA-639300	Rolex Oyster Perpetual Datejust Mens Watch seized in Lewiston, Maine – estimated value \$2,250	2/27/2018
18-DEA-639301	Audemars Piquet Royal Oak Offshore Chronograph Mens Watch seized in Lewiston, Maine – estimated value \$33,900	2/27/2018
18-DEA-639302	Men's 4.5 ct. Diamond Solitaire Ring seized in Lewiston, Maine – estimated value \$37,000	2/27/2018
18-DEA-639303	Gold Flat Band Mens Ring with 11 Diamonds seized in Lewiston, Maine – estimated value \$500	2/27/2018
18-DEA-639314	2006 John Deere 4720 Commercial Tractor w/Snow Blower Attach seized in Lewiston, Maine	2/27/2018
18-DEA-639668	Assorted Gym Equipment, VL: \$6,251.39 seized in Lewiston, Maine	2/27/2018
18-IRS-000395	\$32,000 seized from TD Bank – account of Ty Auto LLC ending in 7543	3/12/2018
18-IRS-000396	\$40,000 seized from TD Bank – account of Tyler Poland ending in 4327	3/12/2018
18-IRS-000397	\$293.39 seized from TD Bank – account of Ty Construction, LLC ending in 7379	3/12/2018
18-IRS-000398	\$50,198.37 seized from Maine Family FCU - account of Timmy Bellmore ending in 8637	2/27/2018
18-IRS-000506	\$220,000 seized from Mechanics Savings Bank – account of D.L.P. Builders, Inc.ending in 2585	2/28/2018
18-DEA-641488	\$135,524.97 held in an escrow account by the Law Offices of Verne E. Paradie, which represents the proceeds from the sale of 17 Bridge Street, Lewiston, Maine	n/a

b. Real Property:

Asset ID	Address	City	Current Owner of Record	Map/Lot or Parcel ID	Deed Book/Page
18-DEA-641489	1830 Lisbon St	Lewiston	1830 Lisbon St., LLC	069/000/012	9579/185
18-DEA-641490	249 Merrow Rd	Auburn	Ty Properties, LLC	186-012	9733/341
18-DEA-641491	230 Merrow Rd, Auburn, or net proceeds from the sale thereof, held in escrow		MR, LLC	186-005	9489/158
Not assigned	4 Marigold Way	Lewiston	Kyle Landry	149/000/216	9276/321
Not assigned	29 Avon Street	Lewiston	Willie Moe Entertainment, Inc.	206/000/29	9356/64

If any of the property described above, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 982(b)(1) and 28 U.S.C. § 2461(c).

FORFEITURE ALLEGATION #2

Upon conviction of one or more of the offenses set forth in Counts 27-35 of this Superseding Indictment, charging violation of 18 U.S.C. § 1956(a)(1)(A)(i), 18 U.S.C. § 1956(a)(1)(B)(i), and 18 U.S.C. § 1956(h), defendants

**TIMMY BELLMORE
TMB AUTO, LLC
BRIAN BILODEAU
MR, LLC
BRIAN BILODEAU, LLC
TYLER POLAND
TY PROPERTIES, LLC
TY CONSTRUCTION, LLC**

shall forfeit to the United States of America pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in such offense, or any property traceable to such property, including, but not limited to each defendant's interest in the following real property:

Asset ID	Address	City	Current Owner of Record	Map/Lot or Parcel ID	Deed Book/Page
18-DEA-641490	249 Merrow Rd	Auburn	Ty Properties, LLC	186-012	9733/341
18-DEA-641491	230 Merrow Rd, Auburn, or net proceeds from the sale thereof, held in escrow		MR, LLC	186-005	9489/158

If any of the property described above, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to

forfeiture of substitute property pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 982(b)(1) and 28 U.S.C. § 2461(c).

All pursuant to 18 U.S.C. § 982.

FORFEITURE ALLEGATION #3


Upon conviction of the offense alleged in Count 14 of this Indictment, defendant

BRIAN BILODEAU

shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), all firearms involved in the commission of the offense, including but not limited to a Beretta, model BU9 Nano, 9mm pistol, bearing serial number NU111403.

A TRUE BILL,
Signature Redacted. Original on File at
Clerk's Office

FOR PERSON


Assistant U.S. Attorney
Date: 10/5/18