FILED 1 -2016 MAR 29 PM 2:49 2 CLERK U.S. BISTRICE COURT CENTRAL DIST OF CALIF. LOS ANGELES. 3 4 5 6 7 8 UNITED STATES DISTRICT COURT 9 FOR THE CENTRAL DISTRICT OF CALIFORNIA CR16-0201 January 2016 Grand Jury 10 No. CR 16-11 UNITED STATES OF AMERICA, 12 Plaintiff, INDICTMENT [21 U.S.C. § 846: Conspiracy to 13 v. Manufacture, Possess with Intent to Distribute, and 14 GARY RESNIK, Distribute Schedule I, II and JOSEPH STANLEY, IV Controlled Substances; 21 15 CHRISTOPHER BOWEN, and U.S.C. §§ 813, 841(a)(1), DYLAN SIMPSON, (b) (1) (B) (viii), (b) (1) (C), 16 (b)(2): Possession with Intent Defendants. to Distribute Schedule I, II 17 and IV Controlled Substances and Controlled Substance 18 Analogues; 21 U.S.C. §§ 841(a)(1), (b)(1)(C), 19 (b)(2): Distribution of Schedule I and IV Controlled 20 Substances; 18 U.S.C. § 924(c)(1)(A)(i): Possession 21 of Firearms in Furtherance of Drug Trafficking Crimes; 21 22 U.S.C. § 853: Criminal Forfeiture] 23 24 25 26 27 28

Case 2:16-cr-00201-SJO Document 50 Filed 03/29/16 Page 1 of 25 Page ID #:137

The Grand Jury charges:

COUNT ONE

[21 U.S.C. § 846]

## A. OBJECTS OF THE CONSPIRACY

Beginning on an unknown date and continuing until on or about March 15, 2016, in Los Angeles and Orange Counties, within the Central District of California, and elsewhere, defendants GARY RESNIK ("RESNIK"), JOSEPH STANLEY ("STANLEY"), CHRISTOPHER BOWEN ("BOWEN"), and DYLAN SIMPSON ("SIMPSON"), and others known and unknown to the Grand Jury, conspired and agreed with each other to:

- (1) knowingly and intentionally manufacture, possess with intent to distribute, and distribute, a mixture and substance containing a detectable amount of acetylfentanyl, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C);
- (2) knowingly and intentionally manufacture, possess with intent to distribute, and distribute, a mixture and substance containing a detectable amount of 3-4methylenedioxyethylcathinone, also known as "methylone," a
  Schedule I controlled substance, in violation of Title 21,
  United States Code, Sections 841(a)(1), (b)(1)(C);
- (3) knowingly and intentionally manufacture, possess with intent to distribute, and distribute, a mixture and substance containing a detectable amount of a-pyrrolidinovalerophenone,

also known as "PVP," a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C);

- (4) knowingly and intentionally manufacture, possess with intent to distribute, and distribute, a mixture and substance containing a detectable amount of 2,2,3,3-tetramethylcyclopropyl, also known as "XLR11," a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C);
- (5) knowingly and intentionally manufacture, possess with intent to distribute, and distribute, a mixture and substance containing a detectable amount of 3, 4methylenedioxymethamphetamine, also known as "MDMA" and "Ecstasy," a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C);
- (6) knowingly and intentionally possess with intent to distribute at least 5 grams of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(B)(viii); and
- (7) knowingly and intentionally manufacture, possess with intent to distribute, and distribute, a mixture and substance containing a detectable amount of alprazolam, also known as "Xanax," a Schedule IV controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(2).

## MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE ACCOMPLISHED

The objects of the conspiracy were to be accomplished in substance as follows:

- 1. Defendants RESNIK, STANLEY, BOWEN, and SIMPSON would order chemicals and equipment from China for the manufacture of drugs.
- 2. Defendants RESNIK, STANLEY, BOWEN, and SIMPSON would receive chemicals and equipment for the manufacture of drugs.
- 3. Defendants RESNIK and BOWEN would engage in the manufacture of drugs at clandestine laboratory sites.
- 4. Defendants RESNIK, STANLEY, BOWEN, and SIMPSON would store and maintain quantities of drugs for distribution to others.
- 5. Defendants RESNIK, STANLEY, BOWEN, and SIMPSON would distribute drugs to others.

## C. OVERT ACTS

In furtherance of the conspiracy, and to accomplish the objects of the conspiracy, defendants RESNIK, STANLEY, BOWEN, and SIMPSON, and others known and unknown to the Grand Jury, committed various overt acts on or about the following dates, within the Central District of California, including, but not limited to, the following:

- 1. On March 1, 2015, defendant RESNIK ordered a rotary tablet press from a company located in Zhejiang, China.
- 2. On March 1, 2015, defendant RESNIK ordered approximately 30 kilograms (66 pounds) of

carbonxymethylcellulose, a chemical which is used in the manufacture of drug tablets.

- 3. On March 22, 2015, defendant RESNIK received the carbonxymethylcellulose at his residence at 5995 East Pacific Coast Highway, Apartment 1, Long Beach, California.
- 4. On April 17, 2015, defendant RESNIK traveled to a warehouse in Compton, California, picked up the rotary tablet press sent from China, and transported it to a warehouse in Carson, California.
- 5. On May 9, 2015, defendant RESNIK caused the rotary pill press to be transported from the warehouse in Carson, California, to a warehouse at 2621 East 67th Street, Unit H, Long Beach, California (the "Long Beach warehouse").
- 6. On May 12, 2015, defendant RESNIK traveled to the Long Beach warehouse and went inside.
- 7. On May 20, 2015, defendant RESNIK received from China a tablet mold and shaping device used in the manufacture of drug tablets.
- 8. On May 29, 2015, defendant RESNIK received from China approximately 10 kilograms (22 pounds) of lactose in powder form, which is used in the manufacture of drug tablets.
- 9. On June 17, 2015, defendant RESNIK drove to the Long Beach warehouse and went inside.
- 10. On June 17 and June 18, 2015, defendant RESNIK manufactured tablets containing acetylfentanyl inside the Long Beach warehouse.
- 11. On June 24, 2015, defendant RESNIK possessed \$2,200 in cash in his residence at 5995 East Pacific Coast Highway,

Apartment 1, Long Beach, California, \$5,560 in cash on his person, and \$6,050 in cash in his 2014 Toyota Tundra vehicle.

- 12. On June 24, 2015, defendant RESNIK possessed a cash counting machine inside his residence at 5995 East Pacific Coast Highway, Apartment 1, Long Beach, California.
- 13. On June 24, 2015, defendants RESNIK, STANLEY, BOWEN, and SIMPSON possessed approximately 30,948 tablets containing acetylfentanyl, 697 tablets containing PVP, 1,679.3 grams of XLR11, 404.7 grams of methylone, and 7.1 grams of methamphetamine at the Long Beach warehouse.
- 14. On June 24, 2015, defendants RESNIK, STANLEY, BOWEN, and SIMPSON possessed five table-top tablet presses, one free-standing tablet press, a grain mill and mixing machine, and other chemicals and equipment used in the manufacture of drugs at the Long Beach warehouse.
- 15. On June 24, 2015, defendant SIMPSON signed an agreement for the rental of a storage space at 17300 Newhope Street, Unit 210C, Fountain Valley, California.
- 16. On July 23, 2015, in a telephone conversation, and in coded language, defendant STANLEY told defendant RESNIK that he put their Blackberry devices in storage.
- 17. On July 23, 2015, in a telephone conversation, and in coded language, defendant RESNIK told defendant STANLEY to take the Blackberry devices out of storage and to obtain new telephone numbers and SIM cards for the devices.
- 18. On July 23, 2015, in a telephone conversation, and in coded language, defendant STANLEY told defendant RESNIK that he

hoped their drug customers would be comfortable working with defendant STANLEY.

- 19. On October 4, 2015, defendant SIMPSON received from China a grain mill and mixing machine used in the manufacture of drugs.
- 20. On October 28, 2015, defendant BOWEN carried a brown box and several bags into defendant RESNIK's residence at 5995
  East Pacific Coast Highway, Apartment 1, Long Beach, California.
- 21. On November 12, 2015, defendants BOWEN and SIMPSON traveled to the residence of defendant STANLEY at 16692 Irby Lane, Huntington Beach, California, and went inside.
- 22. On November 12, 2015, defendant SIMPSON carried a box containing drugs into the residence of defendant STANLEY at 16692 Irby Lane, Huntington Beach, California.
- 23. On November 19, 2015, defendant SIMPSON received from China approximately 28 kilograms (61 pounds) of sodium sulfate, which is used in the manufacture of drugs.
- 24. On January 13, 2016, defendants RESNIK, BOWEN, and SIMPSON travelled to the residence of defendant STANLEY at 16692 Irby Lane, Huntington Beach, California, and went inside.
- 25. On January 13, 2016, defendant SIMPSON drove away from the residence of defendant STANLEY at 16692 Irby Lane, Huntington Beach, California, travelled to the area of Apple and Zinnia Streets in Fountain Valley, California, and parked his car.
- 26. On January 13, 2016, defendant SIMPSON met with an unindicted co-conspirator.

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- 27. On January 13, 2016, defendant SIMPSON provided the unindicted co-conspirator with 4,024 tablets containing acetylfentanyl, 100 tablets containing MDMA, and 456 tablets containing alprazolam.
- On January 26, 2016, defendant BOWEN traveled from his residence at 939 South Hill Street, Apartment 248, Los Angeles, California, to a house at 4151 Harlan Avenue, Baldwin Park, California ("the Baldwin Park house"), for the purpose of manufacturing drugs.
- On January 26, 2016, defendant BOWEN, over a period of several hours, manufactured drugs at the Baldwin Park house.
- On February 4, 2016, defendant SIMPSON traveled to the Baldwin Park house and received drugs.
- On February 12, 2016, defendant BOWEN, over a period of several hours, manufactured drugs at the Baldwin Park house.
- On February 20, 2016, defendant SIMPSON traveled to the Baldwin Park house and received drugs.
- On February 24, 2016, defendant BOWEN, over a period 33. of several hours, manufactured drugs at the Baldwin Park house.
- On February 25, 2016, defendant RESNIK received from China a 1,000 milliliter two-neck flask, which is used in the manufacture of drugs.
- On February 26, 2016, defendant BOWEN received from China approximately 25 kilograms (55 pounds) of sodium hypophosphite, which is used in the manufacture of drugs.
- On March 15, 2016, defendants RESNIK, STANLEY, BOWEN, and SIMPSON possessed tablets and powders containing acetylfentanyl at the Baldwin Park house.

- 37. On March 15, 2016, defendants RESNIK, STANLEY, BOWEN, and SIMPSON possessed four table-top tablet presses, a grain mill and mixing machine, a tablet counter, heat sealers, and other equipment used in the manufacture of drugs at the Baldwin Park House.
- 38. On March 15, 2016, defendants RESNIK, STANLEY, BOWEN, and SIMPSON possessed tablets containing acetylfentanyl at defendant STANLEY's residence at 16692 Irby Lane, Huntington Beach, California.
- 39. On March 15, 2016, defendants RESNIK, STANLEY, BOWEN, and SIMPSON possessed tablets containing acetylfentanyl at defendant BOWEN's residence at 939 South Hill Street, Apartment 248, Los Angeles, California.
- 40. On March 15, 2016, defendants RESNIK, STANLEY, BOWEN, and SIMPSON possessed tablets containing acetylfentanyl at defendant SIMPSON's residence at 16536 Filbert Street, Fountain Valley, California.
- 41. On March 15, 2016, defendant SIMPSON possessed a Raven Arms .25 caliber handgun, a Sig Saur .38 caliber handgun, a Sig Saur .45 caliber handgun, and a Del-Ton AR15 .56 caliber rifle at his residence at 16356 Filbert Street, Fountain Valley, California.
- 42. On March 15, 2016, defendants RESNIK, STANLEY, BOWEN, and SIMPSON possessed tablets containing acetylfentanyl at a storage facility at 17300 Newhope Street, Unit 201C, Fountain Valley, California.

COUNT TWO

[21 U.S.C. §§ 813, 841(a)(1), (b)(1)(C)]

On or about June 24, 2015, in Los Angeles County, within the Central District of California, and elsewhere, defendants GARY RESNIK, JOSEPH STANLEY, CHRISTOPHER BOWEN, and DYLAN SIMPSON knowingly and intentionally possessed with intent to distribute for human consumption a detectable amount of acetylfentanyl, knowing that acetylfentanyl was a controlled substance analogue and which substance was, in fact, a controlled substance analogue of fentanyl, a Schedule II controlled substance.

COUNT THREE

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii)]

On or about June 24, 2015, in Los Angeles County, within the Central District of California, and elsewhere, defendants GARY RESNIK, JOSEPH STANLEY, CHRISTOPHER BOWEN, and DYLAN SIMPSON knowingly and intentionally possessed with intent to distribute at least five grams, that is, approximately 7.1 grams, of methamphetamine, a Schedule II controlled substance.

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COUNT FOUR

[21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

On or about June 24, 2015, in Los Angeles County, within the Central District of California, and elsewhere, defendants GARY RESNIK, JOSEPH STANLEY, CHRISTOPHER BOWEN, and DYLAN SIMPSON knowingly and intentionally possessed with intent to distribute a detectable amount of 3-4-methylenedioxyethylcathinone, also known as "methylone," a Schedule I controlled substance.

COUNT FIVE

[21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

On or about June 24, 2015, in Los Angeles County, within the Central District of California, and elsewhere, defendants GARY RESNIK, JOSEPH STANLEY, CHRISTOPHER BOWEN, and DYLAN SIMPSON knowingly and intentionally possessed with intent to distribute a-pyrrolidinovalerophenone, also known as "PVP," a Schedule I controlled substance.

COUNT SIX

[21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

On or about June 24, 2015, in Los Angeles County, within the Central District of California, and elsewhere defendants GARY RESNIK, JOSEPH STANLEY, CHRISTOPHER BOWEN, and DYLAN SIMPSON knowingly and intentionally possessed with intent to distribute a detectable amount of 2,2,3,3-tetramethylcyclopropyl, also known as "XLR11," a Schedule I controlled substance.

1 COUNT SEVEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

On or about January 13, 2016, in Orange County, within the Central District of California, and elsewhere, defendants GARY RESNIK, JOSEPH STANLEY, CHRISTOPHER BOWEN, and DYLAN SIMPSON knowingly and intentionally distributed a detectable amount of acetylfentanyl, a Schedule I controlled substance.

COUNT EIGHT

[21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

On or about January 13, 2016, in Orange County, within the Central District of California, and elsewhere, defendants GARY RESNIK, JOSEPH STANLEY, CHRISTOPHER BOWEN, and DYLAN SIMPSON knowingly and intentionally distributed a detectable amount of 3, 4-methylenedioxymethamphetamine, also known as "MDMA" and "Ecstasy," a Schedule I controlled substance.

COUNT NINE

[21 U.S.C. §§ 841(a)(1), (b)(2)]

On or about January 13, 2016, in Orange County, within the Central District of California, and elsewhere, defendants GARY RESNIK, JOSEPH STANLEY, CHRISTOPHER BOWEN, and DYLAN SIMPSON knowingly and intentionally distributed a detectable amount of alprazolam, also known as "Xanax," a Schedule IV controlled substance.

COUNT TEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

On or about March 15, 2016, in Orange County, within the Central District of California, and elsewhere, defendants GARY RESNIK, JOSEPH STANLEY, CHRISTOPHER BOWEN, and DYLAN SIMPSON knowingly and intentionally possessed with intent to distribute a detectable amount of acetylfentanyl, a Schedule I controlled substance, at 16692 Irby Lane, Huntington Beach, California.

COUNT ELEVEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

On or about March 15, 2016, in Los Angeles County, within the Central District of California, and elsewhere, defendants GARY RESNIK, JOSEPH STANLEY, CHRISTOPHER BOWEN, and DYLAN SIMPSON knowingly and intentionally possessed with intent to distribute a detectable amount of acetylfentanyl, a Schedule I controlled substance, at 939 South Hill Street, Apartment 248, Los Angeles, California.

COUNT TWELVE

[21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

On or about March 15, 2016, in Orange County, within the Central District of California, and elsewhere, defendants GARY RESNIK, JOSEPH STANLEY, CHRISTOPHER BOWEN, and DYLAN SIMPSON knowingly and intentionally possessed with intent to distribute a detectable amount of acetylfentanyl, a Schedule I controlled substance, at 16536 Filbert Street, Fountain Valley, California.

COUNT THIRTEEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

On or about March 15, 2016, in Los Angeles County, within the Central District of California, and elsewhere, defendants GARY RESNIK, JOSEPH STANLEY, CHRISTOPHER BOWEN, and DYLAN SIMPSON knowingly and intentionally possessed with intent to distribute a detectable amount of acetylfentanyl, a Schedule I controlled substance, at 4151 Harlan Avenue, Baldwin Park, California.

COUNT FOURTEEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

On or about March 15, 2016, in Orange County, within the Central District of California, and elsewhere, defendants GARY RESNIK, JOSEPH STANLEY, CHRISTOPHER BOWEN, and DYLAN SIMPSON knowingly and intentionally possessed with intent to distribute a detectable amount of acetylfentanyl, a Schedule I controlled substance, at 17300 Newhope Street, Unit 201C, Fountain Valley, California.

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COUNT FIFTEEN

[18 U.S.C. §§ 924(c)(1)(A)(i)]

On or about March 15, 2016, in Orange County, within the Central District of California, defendant DYLAN SIMPSON knowingly possessed at least one of the following firearms in furtherance of a drug trafficking crime, namely, conspiracy to manufacture, possess with intent to distribute, and distribute controlled substances, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), (b)(1)(B)(viii), (b)(1)(C), and (b)(2), as charged in Count One of this Indictment, and possession with intent to distribute a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C), as charged in Count Twelve of this Indictment:

- (1) a Raven Arms model MP25 .25 caliber semi-automatic handgun bearing serial number 1413873;
- (2) a Del-Ton model AR15 .56 caliber semi-automatic rifle bearing serial number S044142;
- (3) a Sig Sauer model P238 .38 caliber semi-automatic handgun bearing serial number 27B097379;
- (4) a Sig Sauer model .45 caliber semi-automatic handgun bearing serial number 54B066734.

## FORFEITURE ALLEGATION

[21 U.S.C. § 853]

- 1. The allegations contained in Counts One through Fourteen of this Indictment are hereby repeated, re-alleged, and incorporated by reference herein as though fully set forth at length for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to defendants GARY RESNIK, JOSEPH STANLEY, CHRISTOPHER BOWEN, and DYLAN SIMPSON, that the United States will seek forfeiture as part of any sentence in accordance with Title 21, United States Code, Section 853, in the event of any defendant's conviction under any of Counts One through Fourteen of this Indictment.
- 2. Each defendant convicted of any of Counts One through Fourteen of this Indictment shall forfeit to the United States the following:
- a. All right, title, and interest in any and all property, real or personal - (i) constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of any such offense; and (ii) used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of any such offense; and
- b. A sum of money equal to the total value of the property described in paragraph 2.a. For each of Counts One through Fourteen of this Indictment for which more than one defendant is found guilty, each such defendant shall be jointly

and severally liable for the entire amount ordered forfeited pursuant to that Count.

3. Pursuant to Title 21, United States Code, Section 853(p), each defendant convicted of any of Counts One through Fourteen of this Indictment shall forfeit substitute property, up to the total value of the property described in the preceding paragraph if, as the result of any act or omission of a defendant, the property described in the preceding paragraph, or any portion thereof (a) cannot be located upon the exercise of due diligence; (b) has been transferred, 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 that cannot be divided without difficulty.

A TRUE BILL

Foreperson

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