

FILED

JAN 17 2024

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

**Mark C. McCartt, Clerk
U.S. DISTRICT COURT**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**AARON MICHAEL THOMAS,
DARREN DOIL MEANS,**

Defendants.

Case No. 23-CR-00333-GKF

SUPERSEDING INDICTMENT

**[COUNTS ONE through THREE:
21 U.S.C. §§ 331(a) and 333(a)(2) –
Introduction of a Misbranded Drug
into Interstate Commerce;
COUNT FOUR: 21 U.S.C. §§ 846,
841(a)(1), 841(b)(3), 856(a)(1), and
856(b) – Drug Conspiracy;
COUNT FIVE: 21 U.S.C.
§§ 841(a)(1) and 841(b)(3) –
Possession of Pregabalin with
Intent to Distribute;
COUNT SIX: 21 U.S.C.
§§ 856(a)(1) and 856(b) –
Maintaining a Drug-Involved
Premises;
COUNT SEVEN: 18 U.S.C.
§ 545 – Smuggling Goods into the
United States;
Forfeiture Allegation: 21 U.S.C. §
853 – Drug Forfeiture]**

THE GRAND JURY CHARGES:

COUNT ONE

[21 U.S.C. §§ 331(a) and 333(a)(2)]

On or about January 10, 2023, in the Northern District of Oklahoma and elsewhere, the defendants, **AARON MICHAEL THOMAS** and **DARREN DOIL MEANS**, with intent to defraud and mislead, introduced, delivered for introduction, and caused the introduction of, and delivery for introduction into interstate commerce of a misbranded drug, gabapentin, which was misbranded pursuant to

Title 21, United States Code, Section 352(a), because its labeling was false and misleading in any particular, pursuant to Title 21, United States Code, Section 352(f)(1), because its labeling failed to bear adequate directions for use, and pursuant to Title 21, United States Code, Section 352(o), because it was manufactured, prepared, propagated, compounded, and processed in an establishment not duly registered under Title 21, United States Code, Section 360.

All in violation of Title 21, United States Code, Sections 331(a) and 333(a)(2).

COUNT TWO
[21 U.S.C. §§ 331(a) and 333(a)(2)]

On or about March 2, 2023, in the Northern District of Oklahoma and elsewhere, the defendants, **AARON MICHAEL THOMAS** and **DARREN DOIL MEANS**, with intent to defraud and mislead, introduced, delivered for introduction, and caused the introduction of, and delivery for introduction into interstate commerce of a misbranded drug, xylazine, which was misbranded pursuant to Title 21, United States Code, Section 352(a), because its labeling was false and misleading in any particular, pursuant to Title 21, United States Code, Section 352(f)(1), because its labeling failed to bear adequate directions for use, and pursuant to Title 21, United States Code, Section 352(o), because it was manufactured, prepared, propagated, compounded, and processed in an establishment not duly registered under Title 21, United States Code, Section 360.

All in violation of 21 U.S.C. §§ 331(a) and 333(a)(2).

COUNT THREE
[21 U.S.C. §§ 331(a) and 333(a)(2)]

On or about August 15, 2023, in the Northern District of Oklahoma and elsewhere, the defendants, **AARON MICHAEL THOMAS** and **DARREN DOIL MEANS**, with intent to defraud and mislead, introduced, delivered for introduction, and caused the introduction of, and delivery for introduction into interstate commerce of a misbranded drug, pregabalin, which was misbranded pursuant to Title 21, United States Code, Section 352(a), because its labeling was false and misleading, pursuant to Title 21, United States Code, Section 352(f)(1), because its labeling failed to bear adequate directions for use, and pursuant to Title 21, United States Code, Section 352(o), because it was manufactured, prepared, propagated, compounded, and processed in an establishment not duly registered under Title 21, United States Code, Section 360.

All in violation of 21 U.S.C. §§ 331(a) and 333(a)(2).

COUNT FOUR

[21 U.S.C. §§ 846, 841(a)(1), 841(b)(3), 856(a)(1), and 856(b)]

Between on or about August 18, 2021, to on or about October 24, 2023, in the Northern District of Oklahoma and elsewhere, the defendants, **AARON MICHAEL THOMAS** and **DARREN DOIL MEANS**, knowingly, intentionally, and willfully conspired, confederated, and agreed, together and with others known and unknown to the Grand Jury, to:

(a) distribute and to possess with intent to distribute pregabalin, a Schedule V controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); and

(b) unlawfully and knowingly use and maintain a place located at 1847 West 57th Place, Tulsa, Oklahoma, for the purpose of distributing pregabalin, a Schedule V controlled substance, in violation of Title 21, United States Code, Sections 856(a)(1) and 856(b).

All in violation of Title 21, United States Code, Sections 846, 841(a)(1), 841(b)(3), 856(a)(1), and 856(b).

COUNT FIVE
[21 U.S.C. §§ 841(a)(1) and 841(b)(3)]

On or about October 24, 2023, in the Northern District of Oklahoma and elsewhere, the defendants, **AARON MICHAEL THOMAS** and **DARREN DOIL MEANS**, knowingly and intentionally possessed with intent to distribute pregabalin, a Schedule V controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(3).

COUNT SIX
[21 U.S.C. §§ 856(a)(1) and 856(b)]

From on or about August 18, 2021, to on or about October 24, 2023, in the Northern District of Oklahoma, the defendants, **AARON MICHAEL THOMAS** and **DARREN DOIL MEANS**, unlawfully and knowingly used and maintained a place located at 1847 West 57th Place, Tulsa, Oklahoma, for the purpose of distributing pregabalin, a Schedule V controlled substance.

All in violation of Title 21, United States Code, Sections 856(a)(1) and 856(b).

COUNT SEVEN
[18 U.S.C. § 545]

On or about August 18, 2021, the Northern District of Oklahoma, the defendants, **AARON MICHAEL THOMAS** and **DARREN DOIL MEANS**, fraudulently and knowingly imported and brought, and willfully caused to be imported and brought, merchandise, namely, a parcel of pregabalin, into the United States contrary to law, that is, with labeling that was false and misleading as to the parcel's contents, and labeling that did not bear adequate directions for use, contrary to Title 21, United States Code Sections 331(a), 352(a), and 352(f)(1).

All in violation of Title 18, United States Code Section 545.

FORFEITURE ALLEGATION
[21 U.S.C. § 853]

The allegations contained in this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853, and Title 21, United States Code, Section 982(a)(7).

Upon conviction of the offenses alleged in this Superseding Indictment, as a part of his sentences, the defendants, **AARON MICHAEL THOMAS** and **DARREN DOIL MEANS**, shall forfeit to the United States any property constituting, or derived from, or traceable to, the proceeds obtained, directly or indirectly, as a result of such violations and any property, real or personal, that was used or intended to be used to commit or to facilitate the violations of federal law. The property to be forfeited includes, but is not limited to:

MONEY JUDGMENT

1. A money judgment in an amount representing proceeds obtained by **AARON MICHAEL THOMAS** and **DARREN DOIL MEANS** as a result of the offenses; and

CURRENCY

2. All United States currency seized from **AARON MICHAEL THOMAS** and **DARREN DOIL MEANS** by law enforcement on October 24, 2023.

All pursuant to Title 21, United States Code, Section 853.

CLINTON J. JOHNSON
United States Attorney



NATHAN E. MICHEL
Assistant United States Attorney

A TRUE BILL

/s/ Grand Jury Foreperson
Grand Jury Foreperson