

FILED

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Heidi D. Campbell, Clerk
U.S. DISTRICT COURT

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

UNITED STATES OF AMERICA,

Case No. 23-CR-333-SEH-1

Plaintiff,

INFORMATION

v.

[COUNT ONE: 21 U.S.C. §§ 331(a) and 333(a)(2) – Introduction of a Misbranded Drug into Interstate Commerce;

AARON MICHAEL THOMAS,

COUNT TWO: 21 U.S.C. §§ 856(a)(1) and 856(b) – Maintaining a Drug-Involved Premises;

Defendant.

COUNT THREE: 18 U.S.C. §§ 2252(a)(4)(B) and 2252(b)(2) – Possession of Child Pornography

Forfeiture Allegation: 18 U.S.C. § 982(a)(7), 18 U.S.C. § 2253 and 21 U.S.C. § 853 – Drug and Child Exploitation Forfeiture]

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

[21 U.S.C. 331(a) and §§ 333(a)(2)]

From on or about August 1, 2020, to on or about October 24, 2023, in the Northern District of Oklahoma and elsewhere, the defendant, **AARON MICHAEL THOMAS**, 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 TWO
[21 U.S.C. §§ 856(a)(1) and 856(b)]

From on or about August 1, 2020, to on or about October 24, 2023, in the Northern District of Oklahoma, the defendant, **AARON MICHAEL THOMAS**, 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 THREE
[18 U.S.C. §§ 2252(a)(4)(B) and 2252(b)(2)]

On or about October 24, 2023, in the Northern District of Oklahoma, the defendant, **AARON MICHAEL THOMAS**, knowingly possessed any visual depiction that had been shipped and transported using any means and facility of interstate and foreign commerce, including by computer, the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction was of such conduct. The visual depictions involved at least one prepubescent minor and at least one minor who had not attained 12 years of age engaging in sexually explicit conduct.

All in violation of Title 18, United States Code Sections 2252(a)(4)(B) and 2252(b)(2).

FORFEITURE ALLEGATION
[18 U.S.C. § 982(a)(7), 18 U.S.C. § 2253 and 21 U.S.C. § 853]

The allegations contained in this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(7), Title 18, United States Code, Section 2253 and Title 21, United States Code, Section 853.

Upon conviction of the offenses alleged in this Information, as a part of his sentence, the defendant, **AARON MICHAEL THOMAS**, 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 violation of federal law. The property to be forfeited includes, but is not limited to:

CURRENCY

1. Approximately \$2,296 in United States currency;

DIGITAL CURRENCY

2. Contents of Feather Wallet, Address: 49VW1ikHg44VDZ3MF9eFkden2YP7gM3oiaDRxzyXmNtHE2Rb1edK8dr3BLG9jAz7qHDAREV3gku5cTHa2qYMLRR42tt75SF;
3. Contents of Feather Wallet, Address: 88CzaPsMquaRbr774BLFQUiJoDEFiXNCXBi7zkyNkfeFJGCjPNwA59U6vJAaNbhkX3FRtwSKpr9RggVt3qE2h6ydMDnh4W7;
4. Contents of Feather Wallet, Address: 86wVfUvt2KCFyNKhUfEFW9Lyc8FcJcLidYXwt7DfkdToKW6uvFwd8tGiXzoDMzSLTQZXpB2uEKQLKUXUm9zZuKtiJAuBAtr;

5. Contents of Feather Wallet, Address: 82dF7GC8yc2L1HRyqzYNSLb15gNiyevL9R9qh2F8PaQ3KJXjUs5mJ94K4VN7uatZSEJCHSwcUywdZPSeAQhM37NE6pXuDR;
6. Contents of Feather Wallet, Address: 83oC5yxQ4KhCSmMaJQ4xqQ7kHbu9eUN7a45EYo7beFU23M9MSdcxq2nRp9GBTov6dGX8eb2Hv9S8r9u8SJb4jjV78cz7swy;
7. Contents of Feather Wallet, Address: 457bJ6wMFxwTSSBevMnVaUeN55DdegpyuGoZY1PPnqH8d7YVuujuwxFga9VTd5KbpzSciDVQKws96cGN23RSwqbuTSovpDw9;
8. Contents of Polkadot.js Wallet, Address: 13UVJyLnbVp77Z2t6qswWUQp3MAixTD adn2EjjG8iBcSdi79;
9. Contents of Polkadot.js Wallet, Address: 136VFGm9ssVv2t5GAG9keKRmYwRwo sp1phf1DF89kp7oQoZo;
10. Contents of “Mnemonic 1” Trust Wallet, Address: 0x06884E8FB446352aFba58bce270c9365D5511d51; and
11. Contents of “Mnemonic 2” Trust Wallet, Address: 0x14f5108d44854b254fECA519144743676765b928.

Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1) and 1028(g), and Title 28, United States Code, Section 2461(c), the defendant shall forfeit substitute property, up to the value of the property described above if, by any act or omission of the defendant, the property described above, or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

All pursuant to Title 18, United States Code, Section 982(a)(7), Title 18, United States Code, Section 2253 and Title 21, United States Code, Section 853.

CLINTON J. JOHNSON
United States Attorney



NATHAN E. MICHEL
Assistant United States Attorney