

KAREN L. LOEFFLER
United States Attorney

JAMES BARKELEY
THOMAS C. BRADLEY
Assistant U.S. Attorneys
Federal Building & U.S. Courthouse
222 West Seventh Avenue, #9, Room 253
Anchorage, Alaska 99513-7567
Tel: (907) 271-5071
Fax: (907) 271-1500
E-mail: jim.barkeley@usdoj.gov
thomas.bradley@usdoj.gov

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)	No.
)	
Plaintiff,)	<u>COUNT 1:</u>
)	CONSPIRACY TO
vs.)	UNLAWFULLY IMPORT
)	SCHEDULE I CONTROLLED
ROBIN GATTIS, CHAD JOSEPH)	SUBSTANCE (METHYLONE)
CAMERON and STEPHEN KIMBRELL,)	Vio. 21 U.S.C. §§ 963, 952(a) &
)	960(a)(1) & (b)(3)
Defendants.)	
)	<u>COUNTS 2-3:</u>
)	UNLAWFUL IMPORTATION OF
)	SCHEDULE I CONTROLLED
)	SUBSTANCE (METHYLONE)
)	Vio. 21 U.S.C. §§ 952(a),
)	960(a)(1) & (b)(3)
)	
)	<u>COUNTS 4-5 :</u>
)	POSSESSION WITH INTENT TO
)	DISTRIBUTE METHYLONE
)	Vio. 21 U.S.C. §§ 841(a)(1) &
)	(b)(1)(C)

INDICTMENT

The Grand Jury charges that:

COUNT 1

1. Beginning at some exact time unknown but at least on or about October 1, 2011, and continuing until at least on or about July 31, 2012, both dates being approximate and inclusive, in the District of Alaska and elsewhere, defendants ROBIN GATTIS, CHAD JOSEPH CAMERON, and STEPHEN KIMBRELL, together with other co-conspirators, both known and unknown to the grand jury, did unlawfully and knowingly combine, conspire, confederate, and agree with each other to import 3,4 methylenedioxy-N-methylcathinone, a synthetic cathinone also known as methylone and “molly,” a Schedule I controlled substance, into the United States from China, in violation of Title 21, United States Code, §§ 952(a) and 960(a)(1) and (b)(3).

All of which is in violation of Title 21, United States Code, Sections 963, 952(a), and 960(a)(1) & (b)(3).

COUNT 2

Between on or about February 3 and February 6, 2012, in the District of Alaska and elsewhere, defendant ROBIN GATTIS knowingly and intentionally imported into the United States from China 3,4 methylenedioxy-N-methylcathinone, a synthetic cathinone also known as methylone and “molly,” a Schedule I controlled substance.

All of which is in violation of Title 21, United States Code, Sections 952(a) and 960(a)(1) & (b)(3).

COUNT 3

On or about July 24, 2012, in the District of Alaska and elsewhere, defendant ROBIN GATTIS knowingly and intentionally imported into the United States from China 3,4 methylenedioxy-N-methylcathinone, a synthetic cathinone also known as methylone and “molly,” a Schedule I controlled substance.

All of which is in violation of Title 21, United States Code, Sections 952(a) and 960(a)(1) & (b)(3).

COUNT 4

On or about February 6, 2012, in the District of Alaska, defendant ROBIN GATTIS did knowingly and intentionally possess with intent to distribute 3,4 methylenedioxy-N-methylcathinone, a synthetic cathinone also known as methylone and “molly,” a Schedule I controlled substance.

All of which is in violation of Title 21, United States Code, Section 841(a)(1) & (b)(1)(C).

COUNT 5

On or about July 30, 2012, in the District of Alaska, defendants ROBIN GATTIS, CHAD JOSEPH CAMERON, and STEPHEN KIMBRELL did knowingly and intentionally possess with intent to distribute 3,4 methylenedioxy-N-methylcathinone, a

//

//

//

synthetic cathinone also known as methylone and “molly,” a Schedule I controlled substance.

All of which is in violation of Title 21, United States Code, Section 841(a)(1) & (b)(1)(C).

A TRUE BILL.

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

s/ Thomas C. Bradley for:
JAMES N. BARKELEY
Assistant U.S. Attorney
United States of America

s/ Thomas C. Bradley
THOMAS C. BRADLEY
Assistant U.S. Attorney
United States of America

s/ Kevin Feldis for:
KAREN L. LOEFFLER
United States Attorney
United States of America

DATE: 8/21/12