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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

**3:16-cr-00029-MMD-WGC**

UNITED STATES OF AMERICA,

Case No.

Plaintiff,

**INDICTMENT FOR VIOLATIONS OF:**

v.

21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), and 846;  
21 CFR § 1306.04 – Conspiracy to Distribute  
and Possess with Intent to Distribute Controlled  
Substances (Count 1)

ROBERT GENE RAND,  
RICHARD WINSTON WEST II,  
a/k/a Richie West,  
OMAR AHSAN AHMAD,  
JOSHUA ROSS GREEN,  
CLINT MITCHELL BLOODWORTH,  
KATHLEEN GRIFFIN,  
RYAN DANIEL SMITH,  
ALAN RUSSEL MARTINEZ,  
and  
BRADEN KYLE RILEY,

21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C) –  
Distribution of a Controlled Substance  
(Counts 2, 3, and 4)

21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C);  
21 CFR § 1306.04 – Distribution of a Controlled  
Substance (Count 5)

18 U.S.C. § 924(c)(1)(A) – Possession of  
Firearms During and In Relation to a Drug  
Trafficking Crime (Counts 6 and 10)

21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C) –  
Possession with Intent to Distribute a Controlled  
Substance (Counts 7-9, 11-13)

21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C);  
21 CFR § 1306.04 – Distribution of a Controlled  
Substance Resulting in Death (Count 14)

Defendants.

THE GRAND JURY CHARGES THAT:

**COUNT ONE**

(Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances –  
21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), and 846; 21 CFR § 1306.04)

Beginning on an unknown date, but not later than on or about November 13, 2012, and  
continuing to on or about April 28, 2016, in the State and District of Nevada, and elsewhere,

ROBERT GENE RAND,  
RICHARD WINSTON WEST II, a/k/a Richie West,  
OMAR AHSAN AHMAD,  
JOSHUA ROSS GREEN,  
CLINT MITCHELL BLOODWORTH,  
KATHLEEN GRIFFIN,  
RYAN DANIEL SMITH,  
ALAN RUSSEL MARTINEZ, and  
BRADEN KYLE RILEY,

defendants herein, knowingly and intentionally combined, conspired, confederated and agreed together  
and with each other, and with other persons known and unknown, to distribute and possess with intent  
to distribute controlled substances, such as oxycodone, a Schedule II controlled substance, which were  
prescribed not for a legitimate medical purpose and by an individual practitioner not acting in the usual  
course of professional practice, in violation of Title 21, United States Code, Sections 841(a)(1),  
841(b)(1)(C), and 846; and Title 21, Code of Federal Regulations (“CFR”), Section 1306.04.

**COUNT TWO**

(Distribution of a Controlled Substance –  
21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about November 13, 2015, in the State and District of Nevada,

RICHARD WINSTON WEST II, a/k/a Richie West,

defendant herein, knowingly and intentionally distributed a controlled substance, namely, oxycodone, a  
Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and  
841(b)(1)(C).

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**COUNT THREE**

(Distribution of a Controlled Substance –  
21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about December 3, 2015, in the State and District of Nevada,

RICHARD WINSTON WEST II, a/k/a Richie West,

defendant herein, knowingly and intentionally distributed a controlled substance, namely, oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT FOUR**

(Distribution of a Controlled Substance –  
21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about March 16, 2016, in the State and District of Nevada,

RICHARD WINSTON WEST II, a/k/a Richie West,

defendant herein, knowingly and intentionally distributed a controlled substance, namely, oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT FIVE**

(Distribution of a Controlled Substance –  
21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C); 21 CFR § 1306.04)

Between on or about April 6, 2016, and on or about April 28, 2016, in the District of Nevada,

ROBERT GENE RAND,

defendant herein, knowingly and intentionally distributed a controlled substance, to wit: subsys, which contains fentanyl, a Schedule II controlled substance, to Richard Winston West II, a/k/a Richie West, not for a legitimate medical purpose and by an individual practitioner not acting in the usual course of professional practice, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 21, Code of Federal Regulations, Section 1306.04.

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**COUNT SIX**

(Possession of Firearms During and In Relation to a Drug Trafficking Crime –  
18 U.S.C. § 924(c)(1)(A))

On or about April 28, 2016, in the State and District of Nevada,

RICHARD WINSTON WEST II, a/k/a Richie West,

defendant herein, knowingly possessed firearms, namely, a Sig Sauer P938 .9 millimeter pistol, bearing serial number 52A002932, a STI Tactical .45 caliber pistol, bearing serial number SAS10799, and an AR DTI .223 caliber rifle, bearing serial number B-41363, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States; that is, Possession with Intent to Distribute a Controlled Substance, as set forth in Counts Seven, Eight, and Nine of this Indictment, each incorporated fully by reference herein; all in violation of 18 U.S.C. § 924(c)(1)(A).

**COUNT SEVEN**

(Possession with Intent to Distribute a Controlled Substance –  
21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about April 28, 2016, in a white Ford pickup truck bearing dealer plate 64745, in the State and District of Nevada,

RICHARD WINSTON WEST II, a/k/a Richie West,

defendant herein, knowingly and intentionally possessed with intent to distribute a controlled substance, namely, oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

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**COUNT EIGHT**

(Possession with Intent to Distribute a Controlled Substance –  
21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about April 28, 2016, in a white Ford pickup truck bearing dealer plate 64745, in the State and District of Nevada,

RICHARD WINSTON WEST II, a/k/a Richie West, defendant herein, knowingly and intentionally possessed with intent to distribute a controlled substance, namely, fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT NINE**

(Possession with Intent to Distribute a Controlled Substance –  
21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about April 28, 2016, in a white Ford pickup truck bearing dealer plate 64745, in the State and District of Nevada,

RICHARD WINSTON WEST II, a/k/a Richie West, defendant herein, knowingly and intentionally possessed with intent to distribute a controlled substance, namely, psilocyn, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT TEN**

(Possession of Firearms During and In Relation to a Drug Trafficking Crime –  
18 U.S.C. § 924(c)(1)(A))

On or about April 28, 2016, in the State and District of Nevada,

RICHARD WINSTON WEST II, a/k/a Richie West, defendant herein, knowingly possessed firearms, namely, a Sig Sauer .45 caliber pistol, bearing serial number GS48418, a Sig Sauer .9 millimeter caliber pistol, bearing serial number UU729879, with a suppressor, and a Kel-Tec KSG 12 gauge shotgun, bearing serial number X3370, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States; that is,

1 Possession with Intent to Distribute a Controlled Substance, as set forth in Counts Eleven, Twelve, and  
2 Thirteen of this Indictment, each incorporated fully by reference herein; all in violation of 18 U.S.C. §  
3 924(c)(1)(A).

4 **COUNT ELEVEN**

(Possession with Intent to Distribute a Controlled Substance –  
5 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

6 On or about April 28, 2016, at 14265 Via Contento Court, Reno, State and District of Nevada,

7 RICHARD WINSTON WEST II, a/k/a Richie West,

8 defendant herein, knowingly and intentionally possessed with intent to distribute a controlled  
9 substance, namely, oxycodone, a Schedule II controlled substance, in violation of Title 21, United  
10 States Code, Sections 841(a)(1) and 841(b)(1)(C).

11 **COUNT TWELVE**

(Possession with Intent to Distribute a Controlled Substance –  
12 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

13 On or about April 28, 2016, at 14265 Via Contento Court, Reno, State and District of Nevada,

14 RICHARD WINSTON WEST II, a/k/a Richie West,

15 defendant herein, knowingly and intentionally possessed with intent to distribute a controlled  
16 substance, namely, fentanyl, a Schedule II controlled substance, in violation of Title 21, United States  
17 Code, Sections 841(a)(1) and 841(b)(1)(C).

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**COUNT THIRTEEN**

(Possession with Intent to Distribute a Controlled Substance –  
21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about April 28, 2016, at 14265 Via Contento Court, Reno, State and District of Nevada,

RICHARD WINSTON WEST II, a/k/a Richie West,

defendant herein, knowingly and intentionally possessed with intent to distribute a controlled substance, namely, psilocyn, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT FOURTEEN**

(Distribution of a Controlled Substance Resulting in Death –  
21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C); 21 CFR § 1306.04)

Beginning at an unknown date, but not later than on or about September 30, 2015, in the State and District of Nevada,

ROBERT GENE RAND,

defendant herein, knowingly and intentionally distributed a controlled substance, to wit: by issuing a prescription of oxycodone, a Schedule II controlled substance, to an individual whose name bears the initials M.Y., prescribed not for a legitimate medical purpose and by an individual practitioner not acting in the usual course of professional practice, with the use of that oxycodone resulting in the death of the individual whose name bears the initials M.Y., in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 21, Code of Federal Regulations, Section 1306.04.

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**FORFEITURE ALLEGATION ONE**

The allegations of Count Six of this Indictment are hereby realleged and incorporated fully herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

Upon conviction of Count Six of this Indictment,

RICHARD WINSTON WEST II, a/k/a Richie West, defendant herein, shall forfeit to the United States of America, any firearm or ammunition involved in or used in any knowing violation of Title 18, United States Code, Section 924(c)(1)(A)(ii):

- a. a Sig Sauer P938 .9 millimeter pistol, bearing serial number 52A002932,
- b. a STI Tactical .45 caliber pistol, bearing serial number SAS10799,
- c. an AR DTI .223 caliber rifle, bearing serial number B-41363, and
- d. any and all ammunition (collectively, the “property”).

All pursuant to Title 18, United States Code, Section 924(c)(1)(A)(ii); Title 18, United States Code, Section 924(d)(1); and Title 28, United States Code, Section 2461(c).

**FORFEITURE ALLEGATION TWO**

The allegations of Count Ten of this Indictment are hereby realleged and incorporated fully herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

Upon conviction of Count Ten of this Indictment,

RICHARD WINSTON WEST II, a/k/a Richie West, defendant herein, shall forfeit to the United States of America, any firearm or ammunition involved in or used in any knowing violation of Title 18, United States Code, Section 924(c)(1)(A)(ii):

- a. a Sig Sauer .45 caliber pistol, bearing serial number GS48418,



**DATED this \_\_\_\_ day of May, 2016.**

FOREPERSON OF THE GRAND JURY

**JAMES E. KELLER**  
Assistant United States Attorney