

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

OCT - 7 2020

UNITED STATES OF AMERICA

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BY
No. 1:20 CR _____
Judge 1:20cr82
Heartfield

v.

JEREMY KLINTMAN
a.k.a. "SHAMROCK," (1)
EULALIO TORRES-CADENAS
a.k.a. "YAYO," (2)
SHANE LOUQUE (3)
BREANNA BECKLEY (4)

INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

Count One

Violation: 21 U.S.C. § 846
(Conspiracy to Possess with the Intent to
Distribute a Controlled Substance
(Methamphetamine))

That from in or about May 2016, the exact date being unknown to the Grand Jury, and continuing thereafter until at least in or about August 2016, the exact date being unknown to the Grand Jury, in the Eastern District of Texas and elsewhere, **Jeremy Klintman, a.k.a. "Shamrock," Eulalio Torres-Cadenas, a.k.a. "Yayo," Shane Louque, and Breanna Beckley**, defendants, did knowingly, willfully and unlawfully conspire and agree with persons known and unknown to the Grand Jury to distribute and to possess with the intent to distribute at least 500 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, all in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A).

All in violation of 21 U.S.C. § 846.

NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE

Criminal Forfeiture Pursuant to 21 U.S.C. § 853

Upon conviction of the offenses alleged in Count One of this indictment, pursuant to 21 U.S.C. § 853, **Jeremy Klintman a.k.a. "Shamrock," Eulalio Torres-Cadenas a.k.a. "Yayo," Shane Louque, and Breanna Beckley**, defendants, shall forfeit to the United States pursuant to 21 U.S.C. § 853 any property constituting, or derived from, proceeds obtained directly, or indirectly, as a result of the said violation, and any property used, or intended to be used in any manner or part, to commit or to facilitate the commission of the said violation, including but not limited to:

MONEY JUDGMENT

A sum of money equal to eighty thousand dollars in United States currency, representing the minimum known amount of proceeds obtained as a result of the offenses alleged in Count One, conspiracy to distribute and to possess with the intent to distribute at least 500 grams of a mixture or substance containing a detectable amount of amount of a Schedule II controlled substance, namely: methamphetamine , in violation of 21 U.S.C. § 846, for which each defendant is personally responsible in the following allocations:

a. Jeremy Klintman	\$25,000
b. Eulalio Torres-Cadenas	\$25,000
c. Shane Louque	\$25,000
d. Breanna Beckley	\$5,000

If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s):

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;