

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
CLERK USDC ESW  
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UNITED STATES OF AMERICA,

2021 OCT -5 P 1:09

Plaintiff,

**21-CR-204**

v.

Case No. 21-Cr-  
[18 U.S.C §§ 2(a) & 1952(a)(3); 21  
U.S.C. §§ 841(a)(1), (b)(1)(A),  
(b)(1)(B), (b)(1)(C) & 846, 856(a)(1);  
and 31 U.S.C § 5324(a)(3)]

GERARDO LARA, a.k.a. "MIGO," a.k.a. "DINEROO,"  
SARAH A. BECKIUS,  
BRIAN L. PHILLIPS, a.k.a. "B," a.k.a. "BRITTLE,"  
JASMINE J. GONZALES,  
DEBRA J. URNESS,  
MARQUAN L. WASHINGTON, a.k.a. "MUNCH,"  
MARIO M. JOHNSON, a.k.a. "RO," a.k.a. "ROEGOTTI,"  
ASHLEY M. WESTMORELAND,  
MICHAEL D. HARDIN, a.k.a. "MOJO,"  
TERRY BRUMBY, JR., a.k.a. "T-NICE,"  
CARL GRAYSON, a.k.a. "POPS,"  
PLAZE E. ANDERSON,  
MICHAEL A. WRIGHT, JR., and  
JERI L. BALDERAS,

**SEALED**

Defendants.

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**INDICTMENT**

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**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. Beginning in at least January 2020 and continuing until on or about October 5, 2021, in the State and Eastern District of Wisconsin, the Northern District of Illinois, and elsewhere,

**GERARDO LARA, a.k.a. "MIGO," a.k.a. "DINEROO,"  
SARAH A. BECKIUS,**

**BRIAN L. PHILLIPS, a.k.a. "B," "BRITTLE,"  
JASMINE J. GONZALES,  
DEBRA J. URNESS,  
MARQUAN L. WASHINGTON, a.k.a. "MUNCH,"  
MARIO M. JOHNSON, a.k.a. "RO," a.k.a. "ROEGOTTI,"  
ASHLEY M. WESTMORELAND,  
MICHAEL D. HARDIN, a.k.a "MOJO,"  
TERRY BRUMBY, JR., a.k.a "T-NICE,"  
CARL GRAYSON, a.k.a "POPS,"  
PLAZE E. ANDERSON, and  
MICHAEL A. WRIGHT, JR.**

knowingly and intentionally conspired with each other and with persons known and unknown to the grand jury to possess with intent to distribute and distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

2. The amount of controlled substances involved in the conspiracy attributed to each defendant as a result of his and her own conduct, and the conduct of other conspirators reasonably foreseeable to each of them, included 280 grams or more of a mixture and substance containing cocaine base, in the form of "crack" cocaine, and 5 kilograms or more of a mixture and substance containing cocaine, Schedule II controlled substances.

All in violation of Title 21, United States Code, Sections 846, 841(b)(1)(A)(ii)(II) and 841(b)(1)(A)(iii), and Title 18, United States Code, Section 2(a).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 3, 2020, in the State and Eastern District of Wisconsin,

**PLAZE E. ANDERSON**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing cocaine base, in the form of "crack" cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 21, 2021, in the State and Eastern District of Wisconsin,

**MARQUAN L. WASHINGTON, a.k.a. "MUNCH," and  
CARL GRAYSON**

knowingly distributed a mixture and substance containing cocaine base, in the form of "crack" cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2(a).

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. On or about June 4, 2021, in the State and Eastern District of Wisconsin,

**MICHAEL D. HARDIN, a.k.a. "MOJO," and  
MARIO M. JOHNSON, a.k.a. "RO," a.k.a. "ROEGOTTI,"**

knowingly and intentionally distributed a controlled substance.

2. The offense involved 28 grams or more of a mixture and substance containing cocaine base, in the form of "crack" cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2(a).

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. On or about June 7, 2021, in the State and Eastern District of Wisconsin,

**MARIO M. JOHNSON, a.k.a. "RO," a.k.a. "ROEGOTTI," and  
ASHLEY M. WESTMORELAND**

knowingly and intentionally distributed a controlled substance.

2. The offense involved 28 grams or more of a mixture and substance containing cocaine base, in the form of "crack" cocaine, a Schedule II controlled substance

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2(a).

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 30, 2021, in the State and Eastern District of Wisconsin,

**BRIAN L. PHILLIPS, a.k.a. "B," a.k.a. "BRITTLE,"**

knowingly distributed a mixture and substance containing cocaine base, in the form of "crack" cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 10, 2021, in the State and Eastern District of Wisconsin,

**SARAH A. BECKIUS**

knowingly distributed a mixture and substance containing cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).



**COUNT EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 23, 2021, in the State and Eastern District of Wisconsin,

**ASHLEY M. WESTMORELAND**

knowingly distributed a mixture and substance containing cocaine base, in the form of "crack" cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 8, 2021, in the State and Eastern District of Wisconsin,

**DEBRA J. URNESS**

knowingly distributed a mixture and substance containing cocaine base, in the form of "crack" cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT TEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 22, 2021, in the State and Eastern District of Wisconsin,

**JASMINE J. GONZALES**

knowingly distributed a mixture and substance containing cocaine base, in the form of “crack” cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT ELEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 24, 2021, in the State and Eastern District of Wisconsin,

**MICHAEL A. WRIGHT, JR.**

knowingly distributed a mixture and substance containing cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT TWELVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

Beginning in at least January 2020 and continuing until on or about October 5, 2021, in the State and Eastern District of Wisconsin,

**CARL GRAYSON**

did unlawfully and knowingly use and maintain a place located at XXX8 Kearney Avenue, Racine, Wisconsin for the purpose of manufacturing, distributing, and using a mixture and substance containing cocaine base, in the form of "crack" cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 856(a)(1).

**COUNT THIRTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

Beginning in at least September 2021 and continuing until on or about October 5, 2021, in the State and Eastern District of Wisconsin,

**DEBRA J. URNESS**

did unlawfully and knowingly use and maintain a place located at XXX4 DEANE Boulevard, Racine, Wisconsin for the purpose of manufacturing, distributing, and using a mixture and substance containing cocaine base, in the form of "crack" cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 856(a)(1).

**COUNT FOURTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 10, 2021, in the State and Eastern District of Wisconsin,

**GERARDO LARA, a.k.a. "MIGO," a.k.a. "DINEROO,"  
BRIAN L. PHILLIPS, a.k.a. "B," a.k.a. "BRITTLE,"  
and DEBRA J. UNRESS**

traveled from the State of Wisconsin to the State of Illinois with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, that is, the distribution of controlled substances in violation of Title 21, United States Code, Section 841(a)(1), and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment, and carrying on of such unlawful activity.

In violation of Title 18, United States Code, Sections 1952(a)(3) and 2(a).

**COUNTS FIFTEEN THROUGH NINETEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about the dates set forth below, in the State and Eastern District of Wisconsin,

**JERI L. BALDERAS**

did knowingly and for the purpose of evading the reporting requirements of Section 5331 of Title 31, United States Code, and the regulations promulgated thereunder, structure the following transactions with a domestic financial institution:

<b>Count</b>	<b>Date</b>	<b>Description of Transaction</b>
15	May 20, 2021	\$9,000 cash deposited into Educators Credit Union account ***7409
16	May 24, 2021	\$9,000 cash deposited into Educators Credit Union account ***7409
17	May 27, 2021	\$9,000 cash deposited into Educators Credit Union account ***7409
18	May 28, 2021	\$9,000 cash deposited into Educators Credit Union account ***7409
19	May 29, 2021	\$6,940 cash deposited into Educators Credit Union account ***7409

Each in violation of Title 31, United States Code, Sections 5324(a)(1), 5324(a)(3) and 5324(d), and Title 31, Code of Federal Regulations, Sections 1010.100(t), 1010.311, and 1010.313.



### FORFEITURE NOTICE

1. Upon conviction of the controlled substance offenses alleged in Counts One through Fourteen of this Indictment, the defendants shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the violation and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense. The properties subject to forfeiture include, but are not limited to, a sum of money representing the amount of proceeds obtained as a result of the offenses.

2. Upon conviction of an offense in violation of Title 21, United States Code, Section 856(a)(1), as alleged in Counts Twelve and Thirteen, pursuant to Title 21, United States Code, Section 853(a), the defendant shall forfeit to the United States of America any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the violation and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense.

3. Upon conviction of an offense in violation of Title 18, United States Code, Section 1952, as alleged in Count Fourteen, pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and Title 21 United States Code, Section 2461, the defendant shall forfeit to the United States of America any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the violation.

4. Upon conviction of an offense in violation of Title 31, United States Code, Section 5324, as alleged in Counts Fifteen through Twenty, pursuant to Title 31, United States Code, Section 5317, the defendant shall forfeit to the United States of America all property, real or personal, involved in the offense and any property traceable to such property.

5. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; 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 subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to 21 U.S.C. § 853(p).



FOREPERSON  
Date: 10/5/2021

*Kelly B. V...*  
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FR RICHARD G. FROHLING  
Acting United States Attorney