

FILED

FEB 19 2020

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY ac, DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

No.

CR-20 049 J

TODD MATHEW STRAND,

a/k/a Taz,

a/k/a Chihua,

a/k/a Zat,

a/k/a Zzz,

a/k/a Dude,

HUGO GONZALEZ, JR.,

a/k/a Gordo,

PATTI RENEE MELTON,

a/k/a P,

TODD ALLEN WILLIS,

JENNIFER ANN BRADY,

a/k/a Muskogee Jen,

ANDY JOE HODGES,

ASHLEY MARIE ENDECOTT,

ASHLEY NICOLE NORMAN,

a/k/a Silver,

a/k/a Ashley Nicole Hoots,

a/k/a Ashley Norman Gould,

KENNETH WILLIAM MITCHELL,

HEATHER MARIE CORTEZ, and

TERESA SALAZAR,

Defendants.

Violations: 21 U.S.C. § 846

21 U.S.C. § 841(a)(1)

18 U.S.C. § 2

21 U.S.C. § 843(b)

21 U.S.C. § 856(a)(1)

18 U.S.C. § 1956(h)

18 U.S.C. § 1956(a)(2)(A)

21 U.S.C. § 853

INDICTMENT

The Federal Grand Jury charges:

COUNT 1
(Drug Conspiracy)

From in or about 2017, the exact date being unknown to the Grand Jury, and continuing thereafter through on or about January 2020, the exact dates being unknown to the Grand Jury, in the Western District of Oklahoma and elsewhere,

----- **TODD MATHEW STRAND,**
 a/k/a Taz,
 a/k/a Chihua,
 a/k/a Zat,
 a/k/a Zzz,
 a/k/a Dude,
 HUGO GONZALEZ, JR.,
 a/k/a Gordo,
 PATTI RENEE MELTON,
 a/k/a P,
 TODD ALLEN WILLIS,
 JENNIFER ANN BRADY,
 a/k/a Muskogee Jen,
 ANDY JOE HODGES,
 ASHLEY MARIE ENDECOTT,
 ASHLEY NICOLE NORMAN,
 a/k/a Silver,
 a/k/a Ashley Nicole Hoots,
 a/k/a Ashley Norman Gould,
 KENNETH WILLIAM MITCHELL,
 HEATHER MARIE CORTEZ, and
 TERESA SALAZAR -----

knowingly and intentionally conspired, combined, confederated, and agreed with each other and others, both known and unknown to the Grand Jury, to interdependently possess with intent to distribute and to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

MANNER AND MEANS OF THE CONSPIRACY

The objects of the conspiracy were accomplished by the following means, among others:

1. During the period of the conspiracy, **TODD MATHEW STRAND, HUGO GONZALEZ, JR.**, and others arranged with sources of supply in Texas, Oklahoma, and elsewhere to transport methamphetamine to Oklahoma City, Oklahoma, for the purpose of distributing said drugs.

2. During the period of the conspiracy, members of the conspiracy, including **TODD MATHEW STRAND** and **HUGO GONZALEZ, JR.**, were incarcerated by the Oklahoma Department of Corrections and coordinated the aforementioned drug activities by way of contraband cell phones. Utilizing text messages, smart phone applications like Facebook Messenger, and phone calls, **TODD MATHEW STRAND** and **HUGO GONZALEZ, JR.** directed the importation of methamphetamine into Oklahoma City from the aforementioned areas and arranged for further distribution of that methamphetamine both in and outside of Oklahoma City.

3. Once the drugs arrived in the Oklahoma City area, members of the conspiracy, including **PATTI RENEE MELTON, TODD ALLEN WILLIS, JENNIFER ANN BRADY, ASHLEY NICOLE NORMAN, KENNETH WILLIAM MITCHELL, HEATHER MARIE CORTEZ, TERESA SALAZAR**, and others, stored, maintained, and distributed the drugs.

4. Other individuals, including **PATTI RENEE MELTON, TODD**

ALLEN WILLIS, and others, maintained houses or storage units where drugs, money, and firearms were stored. Such houses would often receive bulk shipments of methamphetamine arranged by **TODD MATHEW STRAND** and **HUGO GONZALEZ, JR.** Other individuals, including **ASHLEY NICOLE NORMAN**, **HEATHER MARIE CORTEZ**, **TODD ALLEN WILLIS**, and **PATTI RENEE MELTON**, would pick up a portion of that methamphetamine for further distribution and simultaneously deliver money or firearms as payment for the methamphetamine.

5. **TODD MATHEW STRAND** and **HUGO GONZALEZ, JR.** would also direct where the money and firearms earned from the distribution of methamphetamine would be taken, including sending bulk cash by the U.S. Postal Service, sending wire transfers to individuals in Mexico, and organizing the transport of firearms across the border into Mexico.

6. The following are some specific examples of some of the ways in which these co-conspirators contributed to the conspiracy: **PATTI RENEE MELTON** maintained a residence located at 420 S Stewart, Norman, Oklahoma, where she would store bulk methamphetamine received from **TODD MATHEW STRAND** and **HUGO GONZALEZ, JR.** She would then distribute methamphetamine, often from local hotels, and transmit money earned from that distribution as directed by **TODD MATHEW STRAND**, **HUGO GONZALEZ, JR.**, and others. **PATTI RENEE MELTON** also maintained a storage unit where drugs and firearms were stored while she was waiting for further instructions from

TODD MATHEW STRAND and **HUGO GONZALEZ, JR.** as to where those items would be sent. Often firearms collected and stored in this manner were transported to Mexico under the direction of **TODD MATHEW STRAND** and **HUGO GONZALEZ, JR.**

7. **TODD ALLEN WILLIS** also maintained multiple houses where methamphetamine was stored on behalf of **TODD MATHEW STRAND** and **HUGO GONZALEZ, JR.** and further distributed bulk quantities of methamphetamine to other individuals.

8. Other members of the conspiracy, including **JENNIFER ANN BRADY, ANDY JOE HODGES, ASHLEY NICOLE NORMAN,** and **KENNETH WILLIAM MITCHELL,** would transport or deliver quantities of methamphetamine to other parts of the state of Oklahoma, including Spiro, Idabel, Ada, and other areas where that methamphetamine would be further re-distributed in street-level quantities. For instance, in November 2018, **KENNETH WILLIAM MITCHELL** and **ASHLEY NICOLE NORMAN** were distributing methamphetamine in the Ada, Oklahoma area, which they had previously obtained from sources connected to **TODD MATHEW STRAND** in the Oklahoma City area. They also made regular trips to Idabel to distribute methamphetamine to distributors there.

9. Still other members of the conspiracy, including **ASHLEY NICOLE NORMAN, HEATHER MARIE CORTEZ,** and others, would assist in collecting money and other goods in payment for methamphetamine supplied by **TODD**

MATHEW STRAND and HUGO GONZALEZ, JR. ASHLEY NICOLE NORMAN, ASHLEY MARIE ENDECOTT, PATTI RENEE MELTON, HEATHER MARIE CORTEZ, and others would also transmit money both directly to **TODD MATHEW STRAND, HUGO GONZALEZ, JR.,** and others, and wire money to individuals, including individuals in Mexico, as directed by **TODD MATHEW STRAND and HUGO GONZALEZ, JR.**

10. During the period of the conspiracy, methamphetamine was stored, maintained, and distributed at various locations. These locations included, but were not limited to: 417 Aniol Avenue, Norman, Oklahoma; 420 S Stewart Street, Norman, Oklahoma; and 2652 SW Grand, Oklahoma City, Oklahoma.

11. During a period of the conspiracy, members of the conspiracy would contact **TODD MATHEW STRAND and HUGO GONZALEZ, JR.** through their contraband cell phones to coordinate the details of the movement of drugs, money, and firearms all as alleged herein.

The Grand Jury incorporates by reference all statements and allegations contained in Counts 2-7 and 9-12 inclusive, as though fully set forth herein.

All in violation of Title 21, United States Code, Section 846, the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(A).

COUNT 2
(Possession of Methamphetamine with Intent to Distribute)

On or about July 9, 2019, in the Western District of Oklahoma and elsewhere,

----- **TODD MATHEW STRAND,**
a/k/a Taz,

**a/k/a Chihua,
a/k/a Zat,
a/k/a Zzz,
a/k/a Dude,
PATTI RENEE MELTON,
a/k/a P,
JENNIFER ANN BRADY,
a/k/a Muskogee Jen, and
ANDY JOE HODGES -----**

knowingly and intentionally possessed with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(A), and Title 18, United States Code, Section 2.

**COUNT 3
(Unlawful Use of a Communication Facility)**

On or about July 9, 2019, in the Western District of Oklahoma and elsewhere,

----- **TODD MATHEW STRAND,
a/k/a Taz,
a/k/a Chihua,
a/k/a Zat,
a/k/a Zzz,
a/k/a Dude,
PATTI RENEE MELTON,
a/k/a P, and
JENNIFER ANN BRADY,
a/k/a Muskogee Jen, -----**

knowingly and intentionally used a communication facility, that is, a telephone, to facilitate the distribution of methamphetamine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 4
(Possession of Methamphetamine with Intent to Distribute)

On or about July 17, 2019, in the Western District of Oklahoma and elsewhere,

----- **TODD MATHEW STRAND,**
 a/k/a Taz,
 a/k/a Chihua,
 a/k/a Zat,
 a/k/a Zzz,
 a/k/a Dude,
 PATTI RENEE MELTON,
 a/k/a P, and
 TODD ALLEN WILLIS -----

knowingly and intentionally possessed with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT 5
(Unlawful Use of a Communication Facility)

On or about July 17, 2019, in the Western District of Oklahoma and elsewhere,

----- **TODD MATHEW STRAND,**
 a/k/a Taz,
 a/k/a Chihua,
 a/k/a Zat,
 a/k/a Zzz,
 a/k/a Dude, and
 PATTI RENEE MELTON,
 a/k/a P, -----

knowingly and intentionally used a communication facility, that is, a telephone, to facilitate the distribution of methamphetamine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 6
(Possession of Methamphetamine with Intent to Distribute)

On or about July 31, 2019, in the Western District of Oklahoma and elsewhere,

----- **TODD MATHEW STRAND,**
 a/k/a Taz,
 a/k/a Chihua,
 a/k/a Zat,
 a/k/a Zzz,
 a/k/a Dude, and
 TERESA SALAZAR -----

knowingly and intentionally possessed with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT 7
(Maintaining a Drug-Involved Premises)

From in or about May 2019 through in or about July 2019, in the Western District of Oklahoma,

----- **PATTI RENEE MELTON,**
 a/k/a P, -----

knowingly and intentionally opened, leased, rented, used, or maintained a place at 420 S Stewart Street, Norman, Oklahoma, for the purpose of storing and distributing methamphetamine, a Schedule II controlled substance.

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

COUNT 8
(Money Laundering Conspiracy)

From on or about 2017, the exact date being unknown to the Grand Jury, and continuing thereafter through on or about January 2020, the exact date being unknown to the Grand Jury, in the Western District of Oklahoma and elsewhere,

----- **TODD MATHEW STRAND,**
 a/k/a Taz,
 a/k/a Chihua,
 a/k/a Zat,
 a/k/a Zzz,
 a/k/a Dude,
 HUGO GONZALEZ, JR.,
 a/k/a Gordo,
 PATTI RENEE MELTON,
 a/k/a P, and
 HEATHER MARIE CORTEZ -----

knowingly and intentionally combined, conspired, and agreed with others, both known and unknown to the Grand Jury, to interdependently transport, transmit, and transfer monetary instruments and funds from a place in the United States to a place outside the United States with the intent to promote the carrying on of a specified unlawful activity—that is, the felonious buying, selling, and dealing in controlled substances and conspiring to do the same, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, both specified unlawful activities. These acts are in violation of Title 18, United States Code,

Section 1956(a)(2)(A).

MANNER AND MEANS OF THE CONSPIRACY

The objects of the conspiracy were to be accomplished and were accomplished by the following means, among others:

1. During the period of the conspiracy, **TODD MATHEW STRAND** and **HUGO GONZALEZ, JR.** were directing the distribution of methamphetamine throughout Oklahoma, including within Oklahoma City. The individuals working for **TODD MATHEW STRAND** and **HUGO GONZALEZ, JR.** also amassed significant amounts of U.S. currency earned from the further distribution of methamphetamine belonging to or controlled by **TODD MATHEW STRAND** and **HUGO GONZALEZ, JR.**

2. During the period of the conspiracy, **PATTI RENEE MELTON, HEATHER MARIE CORTEZ,** and others would sell the methamphetamine that they acquired from **TODD MATHEW STRAND** and **HUGO GONZALEZ, JR.** and collect money from those sales.

3. During the period of the conspiracy, **TODD MATHEW STRAND** and **HUGO GONZALEZ, JR.** would direct **PATTI RENEE MELTON, HEATHER MARIE CORTEZ,** and others to wire a portion of the proceeds from the methamphetamine distribution to individuals in Mexico to pay debts that **TODD MATHEW STRAND** and **HUGO GONZALEZ, JR.** owed for the methamphetamine they had previously purchased, and/or to enable them to acquire additional methamphetamine for additional distribution. **PATTI RENEE**

MELTON, HEATHER MARIE CORTEZ, and others would either wire the money to Mexico themselves, or use third parties, to send the money.

4. In addition, individuals working for **TODD MATHEW STRAND** and **HUGO GONZALEZ, JR.** would regularly transmit money to **TODD MATHEW STRAND** and **HUGO GONZALEZ, JR.** by way of Green Dot, Pay Pal and other methods. In addition to directing others to send wires to individuals in Mexico, both **TODD MATHEW STRAND** and **HUGO GONZALEZ, JR.** would also send wires directly to individuals in Mexico. Again, these funds were designed to promote the continuation of the distribution of controlled substances, including paying for controlled substances previously purchased and/or to enable the acquisition of additional controlled substances.

5. During the period of the conspiracy, **TODD MATHEW STRAND, HUGO GONZALEZ, JR., PATTI RENEE MELTON, and HEATHER MARIE CORTEZ** would use cell phones to discuss the transfer of money, including by sharing confirmatory receipts indicating that the money had been successfully wired to Mexico.

The Grand Jury incorporates by reference all statements and allegations contained in Counts 9–12 as though fully set forth herein.

All in violation of Title 18, United States Code, Section 1956(h).

COUNT 9
(Money Laundering)

On or about the date listed below, in the Western District of Oklahoma,

----- **TODD MATHEW STRAND,**

**a/k/a Taz,
a/k/a Chihua,
a/k/a Zat,
a/k/a Zzz,
a/k/a Dude,** -----

knowingly transported, transmitted, and transferred a monetary instrument and funds from a place in the United States to a place outside the United States with the intent to promote the carrying on of a specified unlawful activity—that is, the felonious buying, selling, and dealing in controlled substances and conspiring to do the same, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, both specified unlawful activities.

<u>Count</u>	<u>Date</u>	<u>Tracking Number</u>	<u>Amount</u>	<u>To</u>	<u>From</u>
9	July 14, 2019	45603232	\$200.00	Chihuahua, Mexico	Sayre, Oklahoma

All in violation of Title 18, United States Code, Section 1956(a)(2)(A).

COUNTS 10-11
(Money Laundering)

On or about the dates listed below, in the Western District of Oklahoma,

----- **PATTI RENEE MELTON,**

a/k/a P, -----

knowingly transported, transmitted, and transferred a monetary instrument and funds from a place in the United States to a place outside the United States with the intent to promote the carrying on of a specified unlawful activity—that is, the felonious buying, selling, and dealing in controlled substances and conspiring to do the same, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, both specified unlawful activities.

<u>Count</u>	<u>Date</u>	<u>Tracking Number</u>	<u>Amount</u>	<u>To</u>	<u>From</u>
10	July 15, 2019	301-956-9295	\$900.00	Chihuahua, Mexico	Norman, Oklahoma
11	July 17, 2019	746-563-190	\$800.00	Chihuahua, Mexico	Oklahoma City, Oklahoma

All in violation of Title 18, United States Code, Section 1956(a)(2)(A), and Title 18, United States Code, Section 2.

COUNT 12
(Money Laundering)

On or about the date listed below, in the Western District of Oklahoma,

----- **HEATHER MARIE CORTEZ** -----

knowingly transported, transmitted, and transferred a monetary instrument and funds from a place in the United States to a place outside the United States with the intent to promote the carrying on of a specified unlawful activity—that is, the felonious buying, selling, and dealing in controlled substances and conspiring to do the same, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, both specified unlawful activities.

<u>Count</u>	<u>Date</u>	<u>Tracking Number</u>	<u>Amount</u>	<u>To</u>	<u>From</u>
12	July 19, 2019	919-633-5057	\$400.00	Chihuahua, Mexico	Oklahoma City, Oklahoma

All in violation of Title 18, United States Code, Section 1956(a)(2)(A).

FORFEITURE

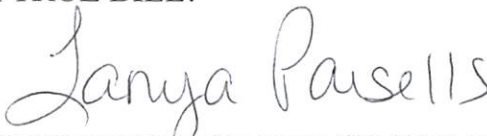
The allegations contained in this Indictment are hereby re-alleged and incorporated for the purpose of alleging forfeiture.

Upon conviction of any of the offenses set forth in Counts 1-7 of this Indictment, **TODD MATHEW STRAND, HUGO GONZALEZ, JR., PATTI RENEE MELTON, TODD ALLEN WILLIS, JENNIFER ANN BRADY, ANDY JOE HODGES, ASHLEY MARIE ENDECOTT, ASHLEY NICOLE NORMAN, KENNETH WILLIAM MITCHELL, HEATHER MARIE CORTEZ, and TERESA SALAZAR,** shall forfeit to the United States any property constituting, or derived from, any proceeds obtained directly or indirectly, as a result of the commission of such offense(s); and any property used, or intended to be used, in any manner or part, to commit or facilitate the commission of such offense(s).


The property subject to forfeiture includes, but is not limited to \$10,797.00 in U.S. currency.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:


FOREPERSON OF THE GRAND JURY


TIMOTHY J. DOWNING
United States Attorney


THOMAS B. SNYDER
DAVID P. PETERMANN
Assistant United States Attorneys