

1 Presented to the Court by the foreman of the  
2 Grand Jury in open Court, in the presence of  
3 the Grand Jury and FILED in The U.S.  
DISTRICT COURT at Seattle, Washington.

4 MARCH 26 2009  
BRUCE RIFKIN, Clerk

5 By:  Deputy

7 UNITED STATES DISTRICT COURT  
8 WESTERN DISTRICT OF WASHINGTON  
9 AT SEATTLE

10 UNITED STATES OF AMERICA,

11 Plaintiff,

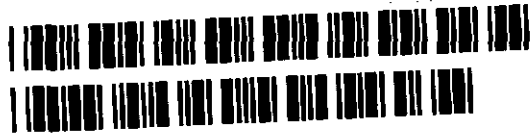
12 v.

13 ADAM CHRISTIAN J. SERRANO,  
14 JAMES GREGORY CAMERON and  
15 JEREMY SNOW,

Defendants.

CR08-244RSL

SUPERSEDING  
INDICTMENT



08-CR-00244-INDI

16 The Grand Jury charges that:

17 **COUNT 1**

18 **(Conspiracy to Possess with the Intent to Distribute Controlled Substances)**

19 Beginning at a time unknown but within the past five years and continuing through  
20 March 13, 2009, in Seattle within the Western District of Washington, and elsewhere,  
21 ADAM CHRISTIAN J. SERRANO, JAMES GREGORY CAMERON, JEREMY  
22 SNOW and others, known and unknown, knowingly and intentionally did conspire to  
23 possess with the intent to distribute controlled substances, including marijuana, a  
24 substance controlled under Schedule I, Title 21, Schedule I; 3,4-  
25 Methylenedioxyamphetamine, also known as MDMA or Ecstasy, a substance  
26 controlled under Schedule I, Title 21, United States Code, Section 812; and cocaine, a  
27 substance controlled under Schedule II, Title 21, United States Code, Section 812.  
28

1           **Manner and Means of the Conspiracy**

2           It was part of the conspiracy that non-commercial helicopters were flown from  
3 Canada across the international border into Northwestern United States to deliver  
4 marijuana and 3,4- Methylenedioxymethamphetamine (MDMA) for distribution in the  
5 United States.

6           It was part of the conspiracy that those helicopters delivered the controlled  
7 substances from Canada to coconspirators who waited in the United States to receive the  
8 loads for distribution in the United States.

9           It was part of the conspiracy that coconspirators picked up loads of cocaine in the  
10 Southwestern United States and drove vehicles with the cocaine to designated helicopter  
11 landing sites in the United States near the international border.

12           It was part of the conspiracy that coconspirators loaded the cocaine onto the  
13 helicopters and pilots flew the helicopters back into Canada with cocaine for distribution  
14 in that country.

15           **Overt Acts of the Conspiracy**

16           In furtherance of the conspiracy, ADAM CHRISTIAN J. SERRANO, JAMES  
17 GREGORY CAMERON, JEREMY SNOW and others, known and unknown, performed  
18 one or more of the following overt acts, including but not limited to:

19           1. Canadian coconspirators purchased a helicopter from a Texas company for  
20 \$900,000 and sent a pilot to take delivery of the helicopter in Texas. In November 2007,  
21 the pilot flew the helicopter to coconspirators in Malakwa, British Columbia, Canada.

22           2. In January 2008, JAMES GREGORY CAMERON and ADAM CHRISTIAN  
23 J. SERRANO communicated, using Blackberry devices, about a possible sale of  
24 thousands of MDMA pills.

25           3. On January 14, 2008, ADAM CHRISTIAN J. SERRANO talked about his  
26 ability to deliver thousands of MDMA pills at a time, to deliver British Columbia  
27 marijuana in the United States, and said the he and his coconspirators paid \$14,000 per  
28 kilogram for cocaine which they smuggled to Canada on a weekly basis. SERRANO

1 | estimated that he and his coconspirators smuggled as many as 300 kilograms of cocaine a  
2 | week from the United States into Canada.

3 | 4. On or about March 5, 2008, coconspirators, including Samuel Lindsay-Brown,  
4 | loaded a helicopter in Canada with approximately 200,000 MDMA pills. A coconspirator  
5 | flew the helicopter into Washington State and delivered the MDMA pills.

6 | 5. On March 6, 2008, two coconspirators, Wayne Coates and Lucretia James,  
7 | possessed the approximately 200,000 MDMA pills in Tukwila, Washington, prior to an  
8 | attempt to distribution the pills to another.

9 | 6. On March 8, 2008, coconspirators possessed a shipment of cocaine in the  
10 | Southwestern United States. One coconspirator, Lucretia James, began driving to  
11 | Washington State with 72 kilograms of the cocaine, until her car was stopped in Northern  
12 | California and the cocaine was seized by law enforcement.

13 | 7. On February 21, 2009, two coconspirators, Ross Legge and Leonard Ferris,  
14 | drove a car in Utah on their way to deliver cocaine to a helicopter in Washington State.  
15 | They possessed 83 kilograms of cocaine, intended for distribution in Canada, in the car.  
16 | Legge and Ferris were stopped by a Utah State Patrol Trooper and the cocaine was seized.

17 | 8. On February 23, 2009, a helicopter piloted by Samuel Lindsey Brown flew  
18 | from Canada into Washington State. He had a load of 420 pounds of marijuana to deliver  
19 | and intended to pick up the 83 kilograms cocaine which had been seized.

20 | 9. Following this helicopter trip, coconspirators communicated using Blackberry  
21 | devices about the lost cocaine, the arrests and their future plans.

22 | 10. On February 28, 2009, a coconspirator possessed a shipment of 20 kilograms  
23 | of cocaine in the Southwestern United States. The coconspirator delivered the shipment  
24 | to another for delivery to a helicopter in Northern Idaho.

25 | 11. On March 5, 2009, a helicopter piloted by coconspirator Jeremy Snow flew  
26 | from Canada into Northern Idaho. That day he intended to deliver approximately 325  
27 | pounds of marijuana as well as approximately 40,000 MDMA pills and to pick up the 20  
28 | kilograms of cocaine which had been seized.

1 It is further alleged that this offense involves 100 kilograms or more of a mixture  
2 or substance containing a detectable amount of marijuana.

3 It is further alleged that this offense involves five kilograms or more of a mixture  
4 or substance containing a detectable amount of cocaine.

5 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)  
6 and Section 846.

7 A TRUE BILL:

8 DATED: 3/26/09

9 Signature of Foreperson Redacted Pursuant to  
10 Policy of Ninth Circuit Judicial Conference

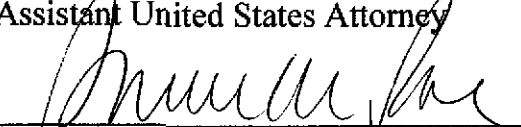
11 FOREPERSON

12  
13  
14 

15 JEFFREY C. SULLIVAN  
16 United States Attorney

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18 DOUGLAS B. WHALLEY  
19 Assistant United States Attorney

20 

21 SUSAN M. ROE  
22 Assistant United States Attorney