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U.S. COURTS

03 SEP 23 AM 10: 59

FILED
CLERK OF S. BURKE

CLERK, IDAHO

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF IDAHO

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 vs.

12 AMY RENEE FLUCKINGER a.k.a.
13 AMY BROWN

14 Defendants.

Case **CR 03- 217 E BLW**

INDICTMENT

21 U.S.C. § 841(a)(1)(B)
21 U.S.C. § 846
18 U.S.C. § 2

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16 **The Grand Jury charges:**

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18 **COUNT ONE**
19 **CONSPIRACY TO POSSESS/DISTRIBUTE A CONTROLLED SUBSTANCE**
20 **(21 U.S.C. § 846, 841(a)(1)(B))**

21 From on or about May 10, 2001 to January 18, 2002, within the District of Idaho and
22 elsewhere, the defendant herein, AMY RENEE FLUCKINGER a.k.a. AMY BROWN, did
23 knowingly and intentionally combine, conspire, confederate and agree with other persons both
24 known and unknown to the Grand Jury to possess with the intent to distribute and distribute a
25 controlled substance, that is, 50 grams or more of a mixture or substance containing a detectable
26 amount of methamphetamine, its salts, isomers, or salts of its isomers in violation of Title 21, United
27 States Code, Sections, 846 and 841(a)(1).
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Acts in Furtherance of the Conspiracy

In furtherance of the criminal conspiracy and to effect the object thereof, in the District of Idaho and elsewhere and on or about the dates set forth below, the defendant and other associates and/or coconspirators, both known and unknown to the Grand Jury, committed and/or caused to be committed acts in furtherance of the conspiracy, including, but not limited to, the following:

(a) Acts Category No. 1 –

On or about May 10, 2001, within Bannock County, in the District of Idaho, the defendant, AMY RENEE FLUCKINGER a.k.a. AMY BROWN, was contacted by co-conspirator Benjamin Quinonez and the two agreed to meet the next day for Quinonez to supply the defendant with methamphetamine for distribution to other persons.

(b) Acts Category No. 2 –

On or between May 11, 2001, and January 9, 2002, within Bannock County, in the District of Idaho, the defendant, AMY RENEE FLUCKINGER a.k.a. AMY BROWN, received 50 grams or more of methamphetamine from co-conspirators, including Benjamin Quinonez, for further distribution to other persons.

(a) Acts Category No. 3 –

On or about January 18, 2002, within Bannock County, in the District of Idaho, the defendant, AMY RENEE FLUCKINGER a.k.a. AMY BROWN, met with co-conspirator Gloria Barajas for purposes of making payment for methamphetamine supplied to her by co-defendant Quinonez for distribution to other persons.

COUNT TWO

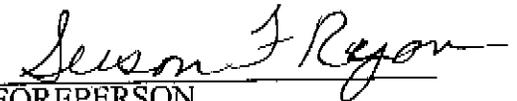
**DRUG POSSESSION/DISTRIBUTION
(21 U.S.C. §§ 841(a)(1) AND (b)(1)(B), 18 U.S.C. § 2)**

On or between May 10, 2001, and January 18, 2002, within Bannock County, in the District of Idaho, the defendant, AMY RENEE FLUCKINGER a.k.a. AMY BROWN, did knowingly and intentionally possess with intent to distribute, and distribute, 50 grams or more of a mixture or

1 substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its
2 isomers, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B), and Title 18,
3 United States Code, Section 2.

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5 DATED this 23 day of September, 2003.

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7 A TRUE BILL:

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9 FOREPERSON

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11 THOMAS E. MOSS
12 United States Attorney
13 By:

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15 MICHAEL J. FICA
16 Assistant United States Attorney
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CRIMINAL COVERSHEET

DEFENDANT'S NAME: Amy Renee Fluckinger
aka Amy Brown

Juvenile: No

DEFENDANT'S
STREET ADDRESS:

Service
Type: Non-Secret /Warrant

DEFENSE ATTORNEY:
Address

Interpreter: No
If yes, language:

Telephone No.:

CR 03- 217 E BLW

INVESTIGATING AGENCY & AGENT: Gary Brush
Idaho State Police

CASE INFORMATION: (List any miscellaneous, magistrate, CVB or other related defendants/case numbers.)

CRIMINAL CHARGING INFORMATION

Complaint Indictment Information Superseding Indictment
X Felony Class A Misdemeanor Class B or C Misdemeanor (Petty Offense)
County of Offense: Bannock Estimated Trial Time: 5 days

TITLE/SECTION	COUNTS	BRIEF DESCRIPTION	PENALTIES (Include Supervised Release and Special Assessments)
21 U.S.C. §§ 846, 841(a)(1)(B)	1	Conspiracy to Possess/Distribute a Controlled Substance	Between 5-40 years incarceration and/or \$2,000,000 fine, 5 years supervised release, and \$100 special assessment
21 U.S.C. §§ 841(a)(1) and (b)(1)(B), 18 U.S.C. § 2	2	Drug Possession/Distribution	Between 5-40 years incarceration and/or \$2,000,000 fine, 5 years supervised release, and \$100 special assessment

Date: September 22, 2003

AUSA: Michael J. Fica
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