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U.S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA

JUL - 2 2025

DANIEL J. McCOY, CLERK
BY:_____

IN THE UNITED STATES DISTRICT COURT

FOR THE WESTERN DISTRICT OF LOUISIANA

ALEXANDRIA DIVISION

UNITED STATES OF AMERICA		*
		*
VERSUS		*
		*
CHANDRAKANT PATEL		*
aka "Lala"	(01)	*
CHAD DOYLE	(02)	*
MICHAEL SLANEY		*
aka "Freck"	(03)	*
GLYNN DIXON	(04)	*
TEBO ONISHEA	(05)	*
		*

1:25-cr-00173
Judge Edwards
Magistrate Judge Perez-Montes

THE GRAND JURY CHARGES:

Count One
Conspiracy to Commit Visa Fraud
[18 U.S.C. §§ 371, 1546(a)]

At times material to this Indictment:

The Process of Applying for a U-Visa

1. Congress created the U nonimmigrant status ("U-Visa") with the passage of the Victims of Trafficking and Violence Protection Act in October 2000. The legislation was intended to strengthen the ability of law enforcement agencies to investigate and prosecute certain crimes while also protecting victims of crimes who are willing to help law enforcement authorities in the investigation or prosecution of the criminal activity.

2. Foreign nationals are eligible for a U-Visa if they (1) were the victim of qualifying criminal activity that occurred in the United States or violated U.S. laws, (2) suffered substantial physical or mental abuse as a result of having been a victim of the criminal activity; (3) possessed information about the criminal activity, (4) were helpful

or were likely to be helpful to law enforcement in the investigation or prosecution of the crime, and (5) were admissible to the United States. Qualifying criminal activities included, among other crimes, extortion, false imprisonment, unlawful criminal restraint, and felonious assault. Certain qualifying family members are also eligible for derivative U-Visa status based upon their relationship to the principal filing for the U-Visa.

3. Qualifying crime victims could apply for U-Visa status by submitting a United States Citizenship and Immigration Services ("USCIS") Form I-918, Petition for U Nonimmigrant Status; a Form I-918, Supplement B, U Nonimmigrant Status Certification; and evidence to establish each eligibility requirement.

4. The Form I-918 asks applicants if they were a victim of qualifying criminal activity, suffered substantial physical or mental abuse as a result of having been a victim of the criminal activity, and possess information concerning the criminal activity. The Form I-918 further requires applicants to attach a personal narrative statement describing the criminal activity, along with supporting documentation. The Form I-918 further requires applicants to certify, under penalty of perjury, that all the information in their petition and any documents submitted with it are complete, true, and correct.

5. The Form I-918, Supplement B requires the signature of an authorized official of a certifying law enforcement agency confirming that the individual was a victim of a qualifying crime and had been or would be helpful in the investigation or prosecution of any resulting case.

6. **Chandrakant Patel** was a resident of Oakdale, Louisiana, and owner of G&G Superette, a convenient store in Glenmore, Louisiana, and EZ Shop, a convenient

store in Oakdale, Louisiana. **Patel** also operated a fast-food restaurant franchise in Oakdale, Louisiana. **Patel** was granted a U-Visa in 2023, based on his alleged status as a victim of armed robbery.

7. **Chad Doyle** was the Chief of Police for the City of Oakdale, Louisiana Police Department.

8. **Michael Slaney** was the Marshal of the Ward 5 Marshal's Office in Oakdale, Louisiana.

9. **Glynn Dixon** was the Chief of Police for the City of Forest Hill, Louisiana Police Department.

10. **Tebo Onishea** was the Chief of Police for the City of Glenmora, Louisiana Police Department.

11. Beginning no later than on or about December 26, 2015, and continuing until at least July 15, 2025, in the Western District of Louisiana and elsewhere, **Chandrakant Patel**, **Chad Doyle**, **Michael Slaney**, **Glynn Dixon**, and **Tebo Onishea** defendants herein, knowingly conspired with each other and others known and unknown to the grand jury (a) to obtain a document prescribed by statute and regulation for entry into and as evidence of authorized stay and employment in the United States, namely, a nonimmigrant U-Visa, which defendants knew to be procured by means of false claims and statements and otherwise procured by fraud and unlawfully obtained, and (b) knowingly make under oath and subscribe as true under penalty of perjury under Title 28, United States Code, Section 1746, a false statement with respect to a material fact in an application, affidavit, and document required by the immigration laws and

regulations prescribed thereunder, and which statement defendants then and there knew as false, in violation of Title 18, United States Code, Section 1546(a).

Manner and Means of the Conspiracy

12. It was part of the conspiracy that **Chandrakant Patel**, **Chad Doyle**, **Michael Slaney**, **Glynn Dixon**, **Tebo Onishea**, and others known and unknown to the grand jury, authored, facilitated, produced, and authenticated false police reports in several central Louisiana parishes. Each report listed several victims of purported armed robberies in the central Louisiana area. The co-conspirators produced these false police reports so that the purported victims of the robberies could apply for U-Visas.

13. It was further part of the conspiracy that individuals seeking U-Visas ("Aliens") contacted **Chandrakant Patel** — or another facilitator who would then contact **Chandrakant Patel** — to be named as "victims" in police reports alleging that an armed robbery had occurred, so that they could submit applications for U-Visas. Aliens paid **Patel** thousands of dollars to participate, and in exchange, **Patel** would ask the co-conspirators, including **Doyle**, **Slaney**, **Dixon**, and **Onishea** to write a false police report naming the Aliens as victims of alleged armed robberies.

14. The majority of the Aliens were non-Louisiana residents.

15. It was also part of the conspiracy that **Doyle**, **Slaney**, **Dixon**, and **Onishea** provided certification and attestation of U-Visa I-918B supporting documents as representatives of their respective law enforcement agencies.

16. It was further part of the conspiracy that, in exchange for generating false police reports, **Patel** paid **Doyle**, **Slaney**, **Dixon**, and **Onishea** approximately $5,000 United States Dollars (USD) for each Alien placed on a law enforcement incident report.

Patel's payment of $5,000 USD was in exchange for the generation of the report, the placing of an individual Alien in the report, and the subsequent U-Visa I-918B certification required for each Alien to apply for a U-Visa.

17. It was further part of the conspiracy that following the generation of fraudulent incident reports, Aliens submitted a completed Form I-918 to USCIS predicated upon their alleged status as a victim of an armed robbery that never occurred.

18. It was further part of the conspiracy that **Patel**, **Doyle**, **Slaney**, **Dixon**, **Onishea**, and others known and unknown to the grand jury concealed, and caused to be concealed, acts taken in furtherance of the conspiracy.

Overt Acts

19. In furtherance of the conspiracy and to affect the object of the conspiracy, the defendants committed the following overt acts, among others, in the Western District of Louisiana, and elsewhere:

a. Counts 2 through 25 are incorporated herein as separate overt acts in furtherance of the conspiracy set forth above, all in violation of Title 18, United States Code, Section 371.

Counts Two through Twenty-Five
Visa Fraud
[18 U.S.C. § 1546(a)]

1. The allegations contained in paragraphs 1 through 18 of Count One of this Indictment are re-alleged as if stated in full herein.

2. From approximately September 27, 2023 until on or about December 26, 2024, in the Western District of Louisiana and elsewhere the defendants, **Chad Doyle**, **Michael Slaney**, **Glynn Dixon**, and **Tebo Onishea** did knowingly

subscribe as true under penalty of perjury under 28 U.S.C. § 1746, false statements with respect to material facts in immigration applications in violation of Title 18, United States Code, Section 1546(a), that is: signed, as certifying officials, I-918B forms stating that individuals were cooperating victims of crimes, which statements the defendants knew then and there were false, in that the individuals were never victims of the crimes alleged in the I-918B forms as follows:

Count	Defendant	Date of Certification	Agency Case Number	Alleged Crime Victim	Date of Alleged Offense	I-918 Form Number
2	**Chad Doyle**	September 17, 2024	24-02505	D. Patel	August 10, 2024	LIN-25-070-50694
3	**Chad Doyle**	May 8, 2024	22-004433	H. Patel	November 1, 2022	LIN-25-033-51387
4	**Chad Doyle**	October 21, 2024	24-02738	P. Patel	September 4, 2024	LIN-25-115-50757
5	**Chad Doyle**	November 18, 2024	24-03287	A. Patel	November 1, 2024	LIN-25-128-50678
6	**Chad Doyle**	December 21, 2024	24-03445	N. Patel	November 15, 2024	LIN-25-140-50170
7	**Chad Doyle**	November 27, 2024	24-03176	K. Patel	October 20, 2024	LIN-25-150-51271
8	**Michael Slaney**	November 1, 2024	0092-24	A. Patel	April 9, 2024	LIN-25-153-51252
9	**Michael Slaney**	November 30, 2024	0015-24	P. Patel	August 27, 2024	LIN-25-150-50028
10	**Michael Slaney**	September 25, 2024	00251-25	G. Patel	August 17, 2024	LIN-25-065-51551
11	**Michael Slaney**	July 15, 2024	001-3250	D. Patel	June 22, 2024	EAC-24-310-50371
12	**Michael Slaney**	January 24, 2024	23-00236	N. Patel	November 3, 2023	EAC-24-127-50440
13	**Michael Slaney**	September 27, 2023	00-32601	J. Patel	March 25, 2023	EAC-24-109-50546
14	**Glynn Dixon**	December 26, 2024	24057	N. Patel	November 26, 2024	LIN-25-151-50816
15	**Glynn Dixon**	October 2, 2024	24036	C. Patel	September 14, 2024	LIN-25-142-50360
16	**Glynn Dixon**	September 12, 2024	24-031	H. Patel	July 13, 2024	LIN-25-132-50307

17	**Glynn Dixon**	June 3, 2024	24-015	M. Patel	March 15, 2024	IOE-84-871-31893
18	**Glynn Dixon**	June 25, 2024	24-022	S. Patel	April 13, 2024	EAC-24-309-50362
19	**Glynn Dixon**	April 12, 2024	24-012	S. Patel	February 25, 2024	EAC-24-291-50062
20	**Tebo Onishea**	September 11, 2024	0624-0117	C. Patel	June 17, 2024	LIN-25-132-50505
21	**Tebo Onishea**	November 14, 2024	0624-0020	M. Patel	June 7, 2024	LIN-25-128-50103
22	**Tebo Onishea**	June 17, 2024	0524-1639	C. Patel	May 3, 2024	LIN-25-058-51225
23	**Tebo Onishea**	September 27, 2024	0124-0027	K. Patel	January 27, 2024	LIN-25-055-50520
24	**Tebo Onishea**	August 21, 2024	0224-01	P. Patel	February 3, 2024	LIN-25-037-50882
25	**Tebo Onishea**	June 26, 2024	05241640	N. Patel	April 30, 2024	LIN-25-015-51234

All in violation of Title 18, United States Code, Section 1546(a).

Count Twenty-Six
Bribery
[18 U.S.C. § 666(a)(2)]

1. The allegations contained in paragraphs 1 through 18 of Count One of this Indictment are re-alleged as if stated in full herein as constituting background information for this count.

2. Additionally, at all times material to this indictment, the Rapides Parish Sheriff's Office was a local government agency that received federal assistance in excess of $10,000 during the one-year period beginning July 1, 2024, and ending June 30, 2025.

3. W.H. was an agent of the Rapides Parish Sheriff's Office, whose duties included investigating crimes, identifying crime victims, gathering victim information, and drafting incident reports.

4. On the date listed below, in the Western District of Louisiana, the defendant **Chandrakant Patel** did corruptly give, offer, and agree to give a thing of

value to W.H. intending to influence and reward W.H. in connection with a transaction and series of transactions of the Rapides Parish Sheriff's Office involving $5,000 USD or more:

Count	Date	Defendant	Item of Value
26	February 18, 2025	**Chandrakant Patel**	$5,000 USD in exchange for a fraudulent police report

All in violation of Title 18, United States Code, Section 666(a)(2).

Counts Twenty-Seven through Fifty
Mail Fraud
[18 U.S.C. § 1341]

1. The allegations contained in paragraphs 1 through 18 of Count One of this Indictment are re-alleged as if stated in full herein, as constituting a scheme and artifice to defraud.

2. On or about the dates set forth below, in the Western District of Louisiana and elsewhere, the defendants, **Chandrakant Patel**, **Chad Doyle**, **Michael Slaney**, **Glynn Dixon**, **Tebo Onishea,** and others known and unknown to the grand jury, for the purpose of executing the above-described scheme and artifice to defraud, and in attempting to do so, did knowingly place, or caused to be placed, in an authorized depository for mail matter, to be sent and delivered by the United States Postal Service, a private interstate carrier, or a commercial interstate carrier, false I-918, Supplement B forms as follows:

Count	Date	Defendants	Mailing	Destination
27	September 17, 2024	**Chandrakant Patel** and **Chad Doyle**	FedEx shipment (USCIS receipt number LIN-25-070-50694)	USCIS Nebraska Service Center in Lincoln, Nebraska
28	May 8, 2024,	**Chandrakant Patel** and **Chad Doyle**	FedEx shipment (USCIS receipt number LIN-25-033-51387)	USCIS Nebraska Service Center in Lincoln, Nebraska
29	October 21, 2024	**Chandrakant Patel** and **Chad Doyle**	FedEx shipment (USCIS receipt number LIN-25-115-50757)	USCIS Nebraska Service Center in Lincoln, Nebraska
30	November 18, 2024	**Chandrakant Patel** and **Chad Doyle**	United States Postal Service shipment (USCIS receipt number LIN-25-128-50678)	USCIS Nebraska Service Center in Lincoln, Nebraska
31	December 21, 2024	**Chandrakant Patel** and **Chad Doyle**	FedEx shipment (USCIS receipt number LIN-25-140-50170)	USCIS Nebraska Service Center in Lincoln, Nebraska
32	November 27, 2024	**Chandrakant Patel** and **Chad Doyle**	UPS shipment (USCIS receipt number LIN-25-150-51271)	USCIS Nebraska Service Center in Lincoln, Nebraska
33	November 1, 2024	**Chandrakant Patel** and **Michael Slaney**	United States Postal Service shipment (USCIS receipt number LIN-25-153-51252)	USCIS Nebraska Service Center in Lincoln, Nebraska
34	November 30, 2024	**Chandrakant Patel** and **Michael Slaney**	United States Postal Service shipment (USCIS receipt number LIN-25-150-50028)	USCIS Nebraska Service Center in Lincoln, Nebraska

35	September 25, 2024	**Chandrakant Patel** and **Michael Slaney**	United States Postal Service shipment (USCIS receipt number LIN-25-065-51551)	USCIS Nebraska Service Center in Lincoln, Nebraska
36	July 15, 2024	**Chandrakant Patel** and **Michael Slaney**	United States Postal Service shipment (USCIS receipt number EAC-24-310-50371)	USCIS Vermont Service Center in Essex Junction, Vermont
37	January 24, 2024	**Chandrakant Patel** and **Michael Slaney**	United States Postal Service shipment (USCIS receipt number EAC-24-127-50440)	USCIS Vermont Service Center in Essex Junction, Vermont
38	September 27, 2023	**Chandrakant Patel** and **Michael Slaney**	United States Postal Service shipment (USCIS receipt number EAC-24-109-50546)	USCIS Vermont Service Center in Essex Junction, Vermont
39	December 26, 2024	**Chandrakant Patel** and **Glynn Dixon**	United States Postal Service shipment (USCIS receipt number LIN-25-151-50816)	USCIS Nebraska Service Center in Lincoln, Nebraska
40	October 2, 2024	**Chandrakant Patel** and **Glynn Dixon**	United States Postal Service shipment (USCIS receipt number LIN-25-142-50360)	USCIS Nebraska Service Center in Lincoln, Nebraska
41	September 12, 2024	**Chandrakant Patel** and **Glynn Dixon**	UPS shipment (USCIS receipt number LIN-25-132-50307)	USCIS Nebraska Service Center in Lincoln, Nebraska
42	June 3, 2024	**Chandrakant Patel** and **Glynn Dixon**	FedEx shipment (USCIS receipt number IOE-84-871-31893)	USCIS Nebraska Service Center in Lincoln, Nebraska

43	June 25, 2024	**Chandrakant Patel** and **Glynn Dixon**	FedEx shipment (USCIS receipt number EAC-24-309-50362)	USCIS Vermont Service Center in Essex Junction, Vermont
44	April 12, 2024	**Chandrakant Patel** and **Glynn Dixon**	United States Postal Service shipment (USCIS receipt number EAC-24-291-50062)	USCIS Vermont Service Center in Essex Junction, Vermont
45	September 11, 2024	**Chandrakant Patel** and **Tebo Onishea**	FedEx shipment (USCIS receipt number LIN-25-132-50505)	USCIS Nebraska Service Center in Lincoln, Nebraska
46	November 14, 2024	**Chandrakant Patel** and **Tebo Onishea**	United States Postal Service shipment (USCIS receipt number LIN-25-128-50103)	USCIS Nebraska Service Center in Lincoln, Nebraska
47	June 17, 2024	**Chandrakant Patel** and **Tebo Onishea**	FedEx shipment (USCIS receipt number LIN-25-058-51225)	USCIS Nebraska Service Center in Lincoln, Nebraska
48	September 27, 2024	**Chandrakant Patel** and **Tebo Onishea**	United States Postal Service shipment (USCIS receipt number LIN-25-055-50520)	USCIS Nebraska Service Center in Lincoln, Nebraska
49	August 21, 2024	**Chandrakant Patel** and **Tebo Onishea**	United States Postal Service shipment (USCIS receipt number LIN-25-037-50882)	USCIS Nebraska Service Center in Lincoln, Nebraska
50	June 26, 2024	**Chandrakant Patel** and **Tebo Onishea**	United States Postal Service shipment (USCIS receipt number LIN-25-015-51234)	USCIS Nebraska Service Center in Lincoln, Nebraska

All in violation of Title 18, United States Code, Section 1341.

Counts Fifty-One through Sixty-Two
Engaging in Monetary Transactions in Property
Derived from Specified Unlawful Activity
[18 U.S.C. §§ 1957 and 2]

1. On or about the dates set forth below, in the Western District of Louisiana and elsewhere, **Chandrakant Patel**, **Chad Doyle**, **Glynn Dixon**, and **Michael Slaney** did knowingly engage and attempt to engage in monetary transactions by, through, and to a financial institution, affecting interstate and foreign commerce, in criminally derived property that was of a value greater than $10,000.00, that is, the deposit, withdrawal, transfer, and exchange of United States currency, funds, and monetary instruments, such property having been derived from specified unlawful activity, that is, visa fraud, conspiracy to commit visa fraud, and mail fraud, in violation of Title 18, United States Code, Sections 1546(a), 371, and 1341:

Count	Defendant	Approx. Date	Monetary Transaction
51	**Chandrakant Patel**	February 2, 2022	$25,000 check written from Sabine State Bank account x1542 made payable to Z. Patel and negotiated at JP Morgan Chase Bank
52	**Chandrakant Patel**	January 16, 2024	$50,000 wire from Sabine State Bank account x1542 to Regions Bank account x9435 for beneficiary S.Hari
53	**Chandrakant Patel**	February 14, 2024	Purchase of $47,000 cashier's check x6517 from Sabine State Bank account x1542
54	**Chandrakant Patel**	February 15, 2024	Purchase of $60,000 certificate of deposit at First Federal Bank of Louisiana account x5376 using funds originating in First Federal Bank of Louisiana account x5132
55	**Chandrakant Patel**	July 16, 2024	$13,000 wire from PNC Bank account x6664 to Peoples Bank of Alabama x8940
56	**Chandrakant Patel**	October 2, 2024	$25,000 wire from PNC Bank account x6664 to Red River Bank account x4263 for beneficiary AMO Title Services, LLC

57	**Chandrakant Patel**	October 15, 2024	Deposit of $39,000 check from PNC Bank account x4287 into First Federal Bank of Louisiana account x0116
58	**Chandrakant Patel**	October 22, 2024	Purchase of real estate in Oakdale, Louisiana, using $51,000 check drawn from First Federal Bank of Louisiana account x0116
59	**Chad Doyle**	November 21, 2024	Purchase of a 2024 Ford F-150 from Vaughn Ford-Lincoln, using $15,000 in United States currency
60	**Glynn Dixon**	October 18, 2023	Purchase of a 2019 GMC Sierra Denali from Sewell Infinity of Fort Worth, using $15,000 in United States currency
61	**Michael Slaney**	March 21, 2025	Purchase of real estate in DeRidder, Louisiana, through presenting cashier's check x1883 in the amount of $40,360 to LA Land and Title, LLC
62	**Michael Slaney**	April 5, 2025	Purchase of 2025 Cougar 29RLP Travel Trailer through presenting cashier's check x4316 in the amount of $14,000 to Primeaux RV

All in violation of Title 18, United States Code, Sections 1957 and 2.

FORFEITURE ALLEGATIONS

1. The allegations contained in this Indictment are hereby realleged and incorporated herein by this reference for the purpose of alleging forfeiture.

2. Pursuant to 18 U.S.C. § 982(a)(6)(a)(ii)(I) and 18 U.S.C. § 982(a)(6)(a)(I) and (ii)(II), upon conviction of any of the offenses alleged in Counts 1-25 of this Indictment, the allegations of which are hereby realleged and incorporated by reference for the purpose of alleging forfeitures, the defendants, **Chandrakant Patel**, **Chad Doyle**, **Michael Slaney**, **Glynn Dixon**, and **Tebo Onishea**, shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds of the

traceable offense, and/or involved in the charged offenses, with such property including, but not being limited to, the following:

A. PNC Bank account x6664,

B. PNC Bank account x4287,

C. First Federal Bank of Louisiana account x0076,

D. First Federal Bank of Louisiana account x0116,

E. First Federal Bank of Louisiana account x5132,

F. Sabine State Bank account x1542,

G. JP Morgan Chase Bank account x1556,

H. JP Morgan Chase Bank account x9941,

I. JP Morgan Chase Bank account x8469,

J. JP Morgan Chase Bank account x3164,

K. Capital One Bank account x5018,

L. Capital One Bank account x6591,

M. First Federal Bank, Safe Deposit Box No. 64, account x1959,

N. First Federal Bank of Louisiana, Certificate of Deposit x5376,

O. Barksdale Federal Credit Union account x9202,

P. Barksdale Federal Credit Union account x9201,

Q. Barksdale Federal Credit Union account x9221,

R. JP Morgan Chase Bank account x9750,

S. Barksdale Federal Credit Union, Safe Deposit Box No. 35,

T. Barksdale Federal Credit Union account x5801,

U. Capital One Bank account x5555,

V. JP Morgan Chase Bank account x8033,

W. JP Morgan Chase Bank account x6075,

X. La Capitol Federal Credit Union account x87-70,

Y. La Capitol Federal Credit Union account x87-00,

Z. Barksdale Federal Credit Union account x4901,

AA. Barksdale Federal Credit Union account x4903,

BB. Barksdale Federal Credit Union account x4921,

CC. Merchants and Farmers Bank account x2759,

DD. Real property with an address of 221 Charles Street, Oakdale, Louisiana 71463,

EE. Real property with an address of 108 Toni Circle, Oakdale, Louisiana 71463,

FF. Real property with an address of 511 W 7th Avenue, Oakdale, Louisiana 71463,

GG. Real property with an address of 417 E Pelican Highway, Oakdale, Louisiana 71463,

HH. Real property with an address of 1503 Highway 1153, Oakdale, Louisiana 71463,

II. Real property with an address of 502 W 7th Street, Oakdale, Louisiana 71463,

JJ. Real property with an address of 0 Dr Brown Road, Lots 12 and 13, DeRidder, Louisiana 70634,

KK. 2025 Land Rover LL, white in color, VIN: SALYL2EX4SA803508,

LL. 2022 Toyota Camry LE, silver in color, VIN: 4T1C11AK5NU678836,

MM. 2024 Ford F-150 Crew Pickup, gray in color, VIN: 1FTFW3L54RKD58009,

NN. 2021 Toyota Sienna Sport Van, gray in color, VIN: 5TDYRKEC6MS073710,

OO. 2019 GMC 1500 Sierra Denali 4-door, red in color, VIN: 1GTU9FELXKZ109397,

PP. 2024 Polaris Ranger Side-by-Side, white in color, VIN: 3NSTAE991RH362770,

QQ. 2025 Cougar 29RLP Travel Trailer, VIN: 4YDTCGN25SV502559,

RR. If any of the property described above, as a result of any act or omission of the defendants:

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;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

3. Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, upon conviction of any of the offenses alleged in Counts 26-50 of this Indictment, the allegations of which are hereby realleged and incorporated by reference for the purpose of alleging forfeitures, the defendants, **Chandrakant Patel**, **Chad Doyle**, **Michael Slaney**, **Glynn Dixon**, and **Tebo Onishea**, shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds of the traceable offense, with such property including, but not being limited to, the following:

A. PNC Bank account x6664,

B. PNC Bank account x4287,

C. First Federal Bank of Louisiana account x0076,

D. First Federal Bank of Louisiana account x0116,

E. First Federal Bank of Louisiana account x5132,

F. Sabine State Bank account x1542,

G. JP Morgan Chase Bank account x1556,

H. JP Morgan Chase Bank account x9941,

I. JP Morgan Chase Bank account x8469,

J. JP Morgan Chase Bank account x3164,

K. Capital One Bank account x5018,

L. Capital One Bank account x6591,

M. First Federal Bank, Safe Deposit Box No. 64, account x1959,

N. First Federal Bank of Louisiana, Certificate of Deposit x5376,

O. Barksdale Federal Credit Union account x9202,

P. Barksdale Federal Credit Union account x9201,

Q. Barksdale Federal Credit Union account x9221,

R. JP Morgan Chase Bank account x9750,

S. Barksdale Federal Credit Union, Safe Deposit Box No. 35,

T. Barksdale Federal Credit Union account x5801,

U. Capital One Bank account x5555,

V. JP Morgan Chase Bank account x8033,

W. JP Morgan Chase Bank account x6075,

X. La Capitol Federal Credit Union account x87-70,

Y. La Capitol Federal Credit Union account x87-00,

Z. Barksdale Federal Credit Union account x4901,

AA. Barksdale Federal Credit Union account x4903,

BB. Barksdale Federal Credit Union account x4921,

CC. Merchants and Farmers Bank account x2759,

DD. Real property with an address of 221 Charles Street, Oakdale, Louisiana 71463,

EE. Real property with an address of 108 Toni Circle, Oakdale, Louisiana 71463,

FF. Real property with an address of 511 W 7th Avenue, Oakdale, Louisiana 71463,

GG. Real property with an address of 417 E Pelican Highway, Oakdale, Louisiana 71463,

HH. Real property with an address of 1503 Highway 1153, Oakdale, Louisiana 71463,

II. Real property with an address of 502 W 7th Street, Oakdale, Louisiana 71463,

JJ. Real property with an address of 0 Dr Brown Road, Lots 12 and 13, DeRidder, Louisiana 70634,

KK. 2025 Land Rover LL, white in color, VIN: SALYL2EX4SA803508,

LL. 2022 Toyota Camry LE, silver in color, VIN: 4T1C11AK5NU678836,

MM. 2024 Ford F-150 Crew Pickup, gray in color, VIN: 1FTFW3L54RKD58009,

NN. 2021 Toyota Sienna Sport Van, gray in color, VIN: 5TDYRKEC6MS073710,

OO. 2019 GMC 1500 Sierra Denali 4-door, red in color, VIN: 1GTU9FELXKZ109397,

PP. 2024 Polaris Ranger Side-by-Side, white in color, VIN: 3NSTAE991RH362770,

QQ. 2025 Cougar 29RLP Travel Trailer, VIN: 4YDTCGN25SV502559,

RR. If any of the property described above, as a result of any act or omission of the defendants:

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;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

4. Pursuant to 18 U.S.C. § 982(a)(1), upon conviction of any of the offenses alleged in Counts 51-62 of this Indictment, the allegations of which are hereby realleged and incorporated by reference for the purpose of alleging forfeitures, the defendants, **Chandrakant Patel**, **Chad Doyle**, **Michael Slaney**, and **Glynn Dixon,** shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds of the traceable offense, and/or involved in the charged offense, with such property including, but not being limited to, the following:

A. PNC Bank account x6664,

B. PNC Bank account x4287,

C. Sabine State Bank account x1542,

D. First Federal Bank of Louisiana, Certificate of Deposit x5376,

E. Real property with an address of 108 Toni Circle, Oakdale, Louisiana 71463,

F. Real property with an address of 417 E Pelican Highway, Oakdale, Louisiana 71463,

G. Real property with an address of 0 Dr Brown Road, Lots 12 and 13, DeRidder, Louisiana 70634,

H. 2024 Ford F-150 Crew Pickup, gray in color, VIN: 1FTFW3L54RKD58009,

I. 2019 GMC 1500 Sierra Denali 4-door, red in color, VIN: 1GTU9FELXKZ109397,

J. 2025 Cougar 29RLP Travel Trailer, VIN: 4YDTCGN25SV502559,

K. If any of the property described above, as a result of any act or omission of the defendants:

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;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(a)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

REDACTED

GRAND JURY FOREPERSON

By:

ALEXANDER C. VAN HOOK
Acting United States Attorney

JOHN W. NICKEL, La. Bar No. 37819
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