

2010-TC-000032

IN THE DISTRICT COURT OF JEFFERSON COUNTY, KANSAS

STATE OF KANSAS
JEFFERSON COUNTY
FILED

STATE OF KANSAS

Plaintiff

2011 JAN 5 PM 4 07

vs.

Case No. 11023

CONNIE D. MILNER
CLERK OF DIST COURT

CLARK SLOAN
15952 S. Clairborne
Olathe, KS 66062

Defendant

U.S. District Court

White/Male HAIR: WHI EYE: GRE
 HGT: 6'0 WGT: 180

AGENCY: Kansas Bureau of Investigations
AGENCY CASE NUMBER: KB109-437

COMPLAINT / INFORMATION

Caleb Stegall, Jefferson County Attorney, for Complaint/Information against the above shown Defendant, alleges and states:

COUNT I: That on or about the 4th day of February, 2010, the said CLARK SLOAN within the above named County and State, then and there being, contrary to the statutes of the State of Kansas, did unlawfully, willfully and feloniously aid and abet another to distribute or possess with the intent to distribute the following controlled substances to wit: *Mescaline*, a Schedule I controlled substance pursuant to 65-4105(d)(17), in violation of K.S.A. 21-3205 and K.S.A. 21-36a05(a)(4), **Aiding and Abetting Another to Commit Unlawful Cultivation or Distribution of Controlled Substances, a Level 3 Drug Felony.**

COUNT II: That on or about the 4th day of February, 2010, the said CLARK SLOAN within the above named County and State, then and there being, contrary to the statutes of the State of Kansas, did unlawfully, willfully and feloniously aid and abet another to distribute or possess with the intent to distribute the following controlled substances to wit: *Buprenorphine*, a Schedule I controlled substance pursuant to 65-4105(d)(11), in violation of K.S.A. 21-3205 and K.S.A. 21-36a05(a)(4), **Aiding and Abetting Another to Commit Unlawful Cultivation or Distribution of Controlled Substances, a Level 3 Drug Felony.**

COUNT III: That on or about the 4th day of February, 2010, the said CLARK SLOAN within the above named County and State, then and there being, contrary to the statutes of the State of Kansas, did unlawfully, willfully and feloniously aid and abet another to distribute or possess with the intent to distribute the following controlled substances to wit: *Dimethyltryptamine*, a Schedule I controlled substance pursuant to 65-4105(d)(13), in violation of K.S.A. 21-3205 and K.S.A. 21-36a05(a)(4), **Aiding and Abetting Another to Commit Unlawful Cultivation or Distribution of Controlled Substances, a Level 3 Drug Felony.**

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COUNT IV: That on or about the 4th day of February, 2010, the said **CLARK SLOAN** within the above named County and State, then and there being, contrary to the statutes of the State of Kansas, did unlawfully, willfully and feloniously distribute or possess with the intent to distribute the following controlled substances to wit: *Lysergic Acid Amide*, a Schedule III controlled substance pursuant to 65-4109(b)(6), in violation of K.S.A. 21-3205 and K.S.A. 21-36a05(a)(2), **Aiding and Abetting Another to Commit Unlawful Cultivation or Distribution of Controlled Substances**, a Level 3 Drug Felony.

COUNT V: That on or about the 4th day of February, 2010, the said **CLARK SLOAN** within the above named County and State, then and there being, contrary to the statutes of the State of Kansas, did unlawfully, willfully and feloniously distribute or possess with the intent to distribute the following controlled substances to wit: *5-methoxy-N,N-dimethyltryptamine*, a controlled substance analog of *Bufofenine*, *5-hydroxy-N,N-dimethyltryptamine*, a Schedule I controlled substance pursuant to 65-4105(d)(11), in violation of K.S.A. 21-3205 and K.S.A. 21-36a05(a)(4), **Aiding and Abetting Another to Commit Unlawful Cultivation or Distribution of Controlled Substances**, a Level 3 Drug Felony.

COUNT VI: That on or about the 4th day of February, 2010, the said **CLARK SLOAN** within the above named County and State, then and there being, contrary to the statutes of the State of Kansas, did unlawfully, willfully and feloniously use a communication facility in committing, causing, or facilitating the commission of a felony under K.S.A. 21-36a05 to wit: **Distribution or Possession with the Intent to Distribute a Controlled Substance**, to wit: *Mescaline*, in violation of K.S.A. 21-36a07(a)(1), **Using Communication Facility in Drug Dealing**, a Level 8 Nondrug Felony.

COUNT VII: That on or about the 4th day of February, 2010, the said **CLARK SLOAN** within the above named County and State, then and there being, contrary to the statutes of the State of Kansas, did unlawfully, willfully and feloniously use a communication facility in committing, causing, or facilitating the commission of a felony under K.S.A. 21-36a05 to wit: **Distribution or Possession with the Intent to Distribute Controlled Substances**, to wit: *Bufofenine*, in violation of K.S.A. 21-36a07(a)(1), **Using Communication Facility in Drug Dealing**, a Level 8 Nondrug Felony.

COUNT VIII: That on or about the 4th day of February, 2010, the said **CLARK SLOAN** within the above named County and State, then and there being, contrary to the statutes of the State of Kansas, did unlawfully, willfully and feloniously use a communication facility in committing, causing, or facilitating the commission of a felony under K.S.A. 21-36a05 to wit: **Distribution or Possession with the Intent to Distribute Controlled Substances**, to wit: *Dimethyltryptamine*, in violation of K.S.A. 21-36a07(a)(1), **Using Communication Facility in Drug Dealing**, a Level 8 Nondrug Felony.

2010-TC-000092

COUNT IX: That on or about the 4th day of February, 2010, the said **CLARK SLOAN** within the above named County and State, then and there being, contrary to the statutes of the State of Kansas, did unlawfully, willfully and feloniously use a communication facility in committing, causing, or facilitating the commission of a felony under K.S.A. 21-36a05 to wit: Distribution or Possession with the Intent to Distribute a Controlled Substance, to wit: *Lysergic Acid Amide*, in violation of K.S.A. 21-36a07(a)(1), **Using Communication Facility in Drug Dealing**, a Level 8 Nondrug Felony.

COUNT X: That on or about the 4th day of February, 2010, the said **CLARK SLOAN** within the above named County and State, then and there being, contrary to the statutes of the State of Kansas, did unlawfully, willfully and feloniously use a communication facility in committing, causing, or facilitating the commission of a felony under K.S.A. 21-36a05 to wit: Distribution or Possession with the Intent to Distribute a Controlled Substance, to wit: *5-methoxy-N,N-dimethyltryptamine, a controlled substance analog of Bufotenine, 5-hydroxy-N,N-dimethyltryptamine*, in violation of K.S.A. 21-36a07(a)(1), **Using Communication Facility in Drug Dealing**, a Level 8 Nondrug Felony.

COUNT XI: That on or about the 4th day of February, 2010, the said **CLARK SLOAN** within the above named County and State, then and there being, contrary to the statutes of the State of Kansas, did unlawfully and intentionally agree with another person, to-wit: Brad Miller and Clark Sloan, to commit or to assist in committing a felony, to wit: Unlawful Cultivation or Distribution of a Controlled Substance, to wit: *Mescaline*; a level 3 Drug Felony under K.S.A. 21-36a05; and the following overt acts in furtherance of the conspiracy were committed by the conspirators, to wit: Jonathan Sloan performed day-to-day business operations as co-owner and manager for BBB including purchasing and maintaining a warehouse in which BBB's business activities were conducted, writing payroll checks, and managing, directing, and assisting staff in taking, processing, packaging, and shipping orders for BBB's ethnobotanical and animal products; Clark Sloan developed and maintained the internet websites for Bouncing Bear Botanicals which included an online storefront for purchasing controlled substances and extensive online forums for customers to discuss topics related to the possession and illicit use of controlled substances; Brad Miller manufactured the K2 that BBB sold to customers, received a share of BBB's total proceeds in exchange for his ownership interest in the business, and solicited and paid Krystle Cole \$500 in cash in both 2008 and 2009 for her to advertise for BBB on her website and to produce "how to" videos intended to increase BBB sales of controlled substances, in violation of K.S.A. 21-3302(d), **Conspiracy to Commit the Unlawful Cultivation or Distribution of Controlled Substances**, a Level 3 Drug Felony.

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COUNT XII: That on or about the 4th day of February, 2010, the said **CLARK SLOAN** within the above named County and State, then and there being, contrary to the statutes of the State of Kansas, did unlawfully and intentionally agree with another person, to-wit: Brad Miller and Clark Sloan, to commit or to assist in committing a felony, to wit: Unlawful Cultivation or Distribution of a Controlled Substance, to wit: *Bufo tenine*; a level 3 Drug Felony under K.S.A. 21-36a05; and the following overt acts in furtherance of the conspiracy were committed by the conspirators, to wit: Jonathan Sloan performed day-to-day business operations as co-owner and manager for BBB including purchasing and maintaining a warehouse in which BBB's business activities were conducted, writing payroll checks, and managing, directing, and assisting staff in taking, processing, packaging, and shipping orders for BBB's ethnobotanical and animal products; Clark Sloan developed and maintained the internet websites for Bouncing Bear Botanicals which included an online storefront for purchasing controlled substances and extensive online forums for customers to discuss topics related to the possession and illicit use of controlled substances; Brad Miller manufactured the K2 that BBB sold to customers, received a share of BBB's total proceeds in exchange for his ownership interest in the business, and solicited and paid Krystle Cole \$500 in cash in both 2008 and 2009 for her to advertise for BBB on her website and to produce "how to" videos intended to increase BBB sales of controlled substances, in violation of K.S.A. 21-3302(d), Conspiracy to Commit the Unlawful Cultivation or Distribution of Controlled Substances, a Level 3 Drug Felony.

COUNT XIII: That on or about the 4th day of February, 2010, the said **CLARK SLOAN** within the above named County and State, then and there being, contrary to the statutes of the State of Kansas, did unlawfully and intentionally agree with another person, to-wit: Brad Miller and Clark Sloan, to commit or to assist in committing a felony, to wit: Unlawful Cultivation or Distribution of a Controlled Substance, to wit: *Dimethyltryptamine*; a level 3 Drug Felony under K.S.A. 21-36a05; and the following overt acts in furtherance of the conspiracy were committed by the conspirators, to wit: Jonathan Sloan performed day-to-day business operations as co-owner and manager for BBB including purchasing and maintaining a warehouse in which BBB's business activities were conducted, writing payroll checks, and managing, directing, and assisting staff in taking, processing, packaging, and shipping orders for BBB's ethnobotanical and animal products; Clark Sloan developed and maintained the internet websites for Bouncing Bear Botanicals which included an online storefront for purchasing controlled substances and extensive online forums for customers to discuss topics related to the possession and illicit use of controlled substances; Brad Miller manufactured the K2 that BBB sold to customers, received a share of BBB's total proceeds in exchange for his ownership interest in the business, and solicited and paid Krystle Cole \$500 in cash in both 2008 and 2009 for her to advertise for BBB on her website and to produce "how to" videos intended to increase BBB sales of controlled substances, in violation of K.S.A. 21-3302(d), Conspiracy to Commit the Unlawful Cultivation or Distribution of Controlled Substances, a Level 3 Drug Felony.

2010-TC-000032

COUNT XIV: That on or about the 4th day of February, 2010, the said **CLARK SLOAN** within the above named County and State, then and there being, contrary to the statutes of the State of Kansas, did unlawfully and intentionally agree with another person, to-wit: Brad Miller and Clark Sloan, to commit or to assist in committing a felony, to wit: Unlawful Cultivation or Distribution of a Controlled Substance, to wit: *Lysergic Acid Amide*; a level 3 Drug Felony under K.S.A. 21-36a05; and the following overt acts in furtherance of the conspiracy were committed by the conspirators, to wit: Jonathan Sloan performed day-to-day business operations as co-owner and manager for BBB including purchasing and maintaining a warehouse in which BBB's business activities were conducted, writing payroll checks, and managing, directing, and assisting staff in taking, processing, packaging, and shipping orders for BBB's ethnobotanical and animal products; Clark Sloan developed and maintained the internet websites for Bouncing Bear Botanicals which included an online storefront for purchasing controlled substances and extensive online forums for customers to discuss topics related to the possession and illicit use of controlled substances; Brad Miller manufactured the K2 that BBB sold to customers, received a share of BBB's total proceeds in exchange for his ownership interest in the business, and solicited and paid Krystle Cole \$500 in cash in both 2008 and 2009 for her to advertise for BBB on her website and to produce "how to" videos intended to increase BBB sales of controlled substances, in violation of K.S.A. 21-3302(d), Conspiracy to Commit the Unlawful Cultivation or Distribution of Controlled Substances, a Level 3 Drug Felony.

COUNT XV: That on or about the 4th day of February, 2010, the said **CLARK SLOAN** within the above named County and State, then and there being, contrary to the statutes of the State of Kansas, did unlawfully and intentionally agree with another person, to-wit: Brad Miller and Clark Sloan, to commit or to assist in committing a felony, to wit: Unlawful Cultivation or Distribution of a Controlled Substance, to wit: *5-methoxy-N,N-dimethyltryptamine, a controlled substance analog of Bufotenine, 5-hydroxy-N,N-dimethyltryptamine*; a level 3 Drug Felony under K.S.A. 21-36a05; and the following overt acts in furtherance of the conspiracy were committed by the conspirators, to wit: Jonathan Sloan performed day-to-day business operations as co-owner and manager for BBB including purchasing and maintaining a warehouse in which BBB's business activities were conducted, writing payroll checks, and managing, directing, and assisting staff in taking, processing, packaging, and shipping orders for BBB's ethnobotanical and animal products; Clark Sloan developed and maintained the internet websites for Bouncing Bear Botanicals which included an online storefront for purchasing controlled substances and extensive online forums for customers to discuss topics related to the possession and illicit use of controlled substances; Brad Miller manufactured the K2 that BBB sold to customers, received a share of BBB's total proceeds in exchange for his ownership interest in the business, and solicited and paid Krystle Cole \$500 in cash in both 2008 and 2009 for her to advertise for BBB on her website and to produce "how to" videos intended to increase BBB sales of controlled substances, in violation of K.S.A. 21-3302(d), Conspiracy to Commit the Unlawful Cultivation or Distribution of Controlled Substances, a Level 3 Drug Felony.

COUNT XVI: That on or about the 4th day of February, 2010, the said **CLARK SLOAN** within the above named County and State, then and there being, contrary to the statutes of the State of Kansas, did unlawfully and intentionally agree with another person, to-wit: Brad Miller and Clark Sloan, to commit or to assist in committing a felony, to wit: Use of a Communication Facility in Drug Dealing a controlled substance, to wit: *Mescaline*; a level 8 nondrug felony under K.S.A. 21-36a07(a)(1); and the following overt acts in furtherance of the conspiracy were committed by the conspirators, to wit: Jonathan Sloan performed day-to-day business operations as co-owner and manager for BBB including purchasing and maintaining a warehouse in which BBB's business activities were conducted, writing payroll checks, and managing, directing, and assisting staff in taking, processing, packaging, and shipping orders for BBB's ethnobotanical and animal products; Clark Sloan developed and maintained the internet websites for Bouncing Bear Botanicals which included an online storefront for purchasing controlled substances and extensive online forums for customers to discuss topics related to the possession and illicit use of controlled substances; Brad Miller manufactured the K2 that BBB sold to customers, received a share of BBB's total proceeds in exchange for his ownership interest in the business, and solicited and paid Krystle Cole \$500 in cash in both 2008 and 2009 for her to advertise for BBB on her website and to produce "how to" videos intended to increase BBB sales of controlled substances, in violation of K.S.A. 21-3302(d), Conspiracy to Commit the Use of a Communication Facility in Drug Dealing, a Level 10 Nondrug Felony.

COUNT XVII: That on or about the 4th day of February, 2010, the said **CLARK SLOAN** within the above named County and State, then and there being, contrary to the statutes of the State of Kansas, did unlawfully and intentionally agree with another person, to-wit: Brad Miller and Clark Sloan, to commit or to assist in committing a felony, to wit: Use of a Communication Facility in Drug Dealing a controlled substance, to wit: *Bufotenine*; a level 8 nondrug felony under K.S.A. 21-36a07(a)(1); and the following overt acts in furtherance of the conspiracy were committed by the conspirators, to wit: Jonathan Sloan performed day-to-day business operations as co-owner and manager for BBB including purchasing and maintaining a warehouse in which BBB's business activities were conducted, writing payroll checks, and managing, directing, and assisting staff in taking, processing, packaging, and shipping orders for BBB's ethnobotanical and animal products; Clark Sloan developed and maintained the internet websites for Bouncing Bear Botanicals which included an online storefront for purchasing controlled substances and extensive online forums for customers to discuss topics related to the possession and illicit use of controlled substances; Brad Miller manufactured the K2 that BBB sold to customers, received a share of BBB's total proceeds in exchange for his ownership interest in the business, and solicited and paid Krystle Cole \$500 in cash in both 2008 and 2009 for her to advertise for BBB on her website and to produce "how to" videos intended to increase BBB sales of controlled substances, in violation of K.S.A. 21-3302(d), Conspiracy to Commit the Use of a Communication Facility in Drug Dealing, a Level 10 Nondrug Felony.

2010-TC-000032

COUNT XVIII: That on or about the 4th day of February, 2010, the said **CLARK SLOAN** within the above named County and State, then and there being, contrary to the statutes of the State of Kansas, did unlawfully and intentionally agree with another person, to-wit: Brad Miller and Clark Sloan, to commit or to assist in committing a felony, to wit: Use of a Communication Facility in Drug Dealing a controlled substance, to wit: *Dimethyltryptamine*; a level 8 nondrug felony under K.S.A. 21-36a07(a)(1); and the following overt acts in furtherance of the conspiracy were committed by the conspirators, to wit: Jonathan Sloan performed day-to-day business operations as co-owner and manager for BBB including purchasing and maintaining a warehouse in which BBB's business activities were conducted, writing payroll checks, and managing, directing, and assisting staff in taking, processing, packaging, and shipping orders for BBB's ethnobotanical and animal products; Clark Sloan developed and maintained the internet websites for Bouncing Bear Botanicals which included an online storefront for purchasing controlled substances and extensive online forums for customers to discuss topics related to the possession and illicit use of controlled substances; Brad Miller manufactured the K2 that BBB sold to customers, received a share of BBB's total proceeds in exchange for his ownership interest in the business, and solicited and paid Krystle Cole \$500 in cash in both 2008 and 2009 for her to advertise for BBB on her website and to produce "how to" videos intended to increase BBB sales of controlled substances, in violation of K.S.A. 21-3302(d), Conspiracy to Commit the Use of a Communication Facility in Drug Dealing, a Level 10 Nondrug Felony.

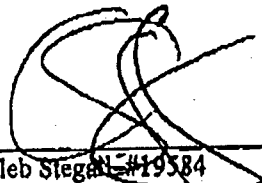
COUNT XIX: That on or about the 4th day of February, 2010, the said **CLARK SLOAN** within the above named County and State, then and there being, contrary to the statutes of the State of Kansas, did unlawfully and intentionally agree with another person, to-wit: Brad Miller and Clark Sloan, to commit or to assist in committing a felony, to wit: Use of a Communication Facility in Drug Dealing a controlled substance, to wit: *Lysergic Acid Amide*; a level 8 nondrug felony under K.S.A. 21-36a07(a)(1); and the following overt acts in furtherance of the conspiracy were committed by the conspirators, to wit: Jonathan Sloan performed day-to-day business operations as co-owner and manager for BBB including purchasing and maintaining a warehouse in which BBB's business activities were conducted, writing payroll checks, and managing, directing, and assisting staff in taking, processing, packaging, and shipping orders for BBB's ethnobotanical and animal products; Clark Sloan developed and maintained the internet websites for Bouncing Bear Botanicals which included an online storefront for purchasing controlled substances and extensive online forums for customers to discuss topics related to the possession and illicit use of controlled substances; Brad Miller manufactured the K2 that BBB sold to customers, received a share of BBB's total proceeds in exchange for his ownership interest in the business, and solicited and paid Krystle Cole \$500 in cash in both 2008 and 2009 for her to advertise for BBB on her website and to produce "how to" videos intended to increase BBB sales of controlled substances, in violation of K.S.A. 21-3302(d), Conspiracy to Commit the Use of a Communication Facility in Drug Dealing, a Level 10 Nondrug Felony.

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COUNT XX: That on or about the 4th day of February, 2010, the said **CLARK SLOAN** within the above named County and State, then and there being, contrary to the statutes of the State of Kansas, did unlawfully and intentionally agree with another person, to-wit: Brad Miller and Clark Sloan, to commit or to assist in committing a felony, to wit: Use of a Communication Facility in Drug Dealing a controlled substance, to wit: *5-methoxy-N,N-dimethyltryptamine, a controlled substance analog of Bufotenine, 5-hydroxy-N,N-dimethyltryptamine*; a level 8 nondrug felony under K.S.A. 21-36a07(a)(1); and the following overt acts in furtherance of the conspiracy were committed by the conspirators, to wit: Jonathan Sloan performed day-to-day business operations as co-owner and manager for BBB including purchasing and maintaining a warehouse in which BBB's business activities were conducted, writing payroll checks, and managing, directing, and assisting staff in taking, processing, packaging, and shipping orders for BBB's ethnobotanical and animal products; Clark Sloan developed and maintained the internet websites for Bouncing Bear Botanicals which included an online storefront for purchasing controlled substances and extensive online forums for customers to discuss topics related to the possession and illicit use of controlled substances; Brad Miller manufactured the K2 that BBB sold to customers, received a share of BBB's total proceeds in exchange for his ownership interest in the business, and solicited and paid Krystle Cole \$500 in cash in both 2008 and 2009 for her to advertise for BBB on her website and to produce "how to" videos intended to increase BBB sales of controlled substances, in violation of K.S.A. 21-3302(d), Conspiracy to Commit the Use of a Communication Facility in Drug Dealing, a Level 10 Nondrug Felony.

2010-TC-000032

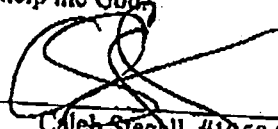
- WITNESSES:** Kansas Bureau of Investigation SA Kerry Hommertzhelm
 Kansas Bureau of Investigation SA Jim Schieferecke, Jr.
 Kansas Bureau of Investigation SA Traci Fruit
 Kansas Bureau of Investigation SsA James Carmack
 Kansas Bureau of Investigation SA Amanda Young
 Kansas Bureau of Investigation SA Cindy Smith
 Kansas Bureau of Investigation SA Dave Schroeder
 Kansas Bureau of Investigation William Smith
 Kansas Bureau of Investigation Tim Leaky
 Kansas Bureau of Investigation, SA John Martino
 Johnson County Drug Crime Lab, Jeremiah Morris
 DEA, TFO Chris Farkes
 Kansas Department of Revenue, Darcy Hamilton
 Kansas Department of Revenue, Christy Weller
 FDA, Todd Blair
 Heart of America Chapter Reg. Computer Forensic Lab, SA Keith Hall
 Leavenworth Police Department SIU, Officer Neil Vogel
 Allen County Sheriff's Department, Deputy Timothy Beckham
 Garnet Police Department, Det. Kurt King
 Douglas County Nature Center, Martha Birnell
 Jefferson County Sheriff's Department, Det. Jerry Greene
 Jefferson County Sheriff's Department, Det. Kirk Vernon
 Jefferson County Sheriff's Department, Det. Troy Frost
 Jefferson County Sheriff's Department, Det. Ramon Gonzalez
 Jefferson County Sheriff's Department, Evidence Custodian Robert Hefner
 Jefferson County Sheriff's Department, Deputy Tom Ryan
 Miller Hardware Store Owner, Michael Blaufuss
 Thomas Thorp
 Ryan Vanchieri
 Scott Norris
 Patricia Blanchat
 * Krystle Cole
 Dena Neivert
 Coleta McCarter
 Larry McCarter
 Dottie Harries
 Everado Cazares
 Christopher Haley
 Dennis Schultz
 June Schultz




 Caleb Stegall #19584
 Jefferson County Attorney
 ATTORNEY FOR PLAINTIFF

STATE OF KANSAS)
COUNTY OF JEFFERSON) ss:

I, Caleb Stegall, do solemnly swear, that the matters set forth in the within Complaint are true to the best of my information and belief, so help me God.


Caleb Stegall, #19584
Jefferson County Attorney

Subscribed and sworn to before me this 5th day of January, 2011.


Kathy Edmonds
Notary Public

My Appointment Expires:

