

UNITED STATES OF AMERICA

v.

WALTER HARTWELL WHITE

CRIMINAL COMPLAINT

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge.

COUNT ONE: CONSPIRACY TO DISTRIBUTE CONTROLLED SUBSTANCES

(21 U.S.C. 846)

From on or about January 2008, and continuing until on or about September 2010, in the District of New Mexico and elsewhere, WALTER HARTWELL WHITE, also known as "Heisenberg," did knowingly and intentionally conspire with others to manufacture and distribute methamphetamine, a Schedule II controlled substance.

COUNT TWO: MONEY LAUNDERING

(18 U.S.C. 1956(a)(1)(B)(i))

From on or about January 2008, and continuing until on or about September 2010, WALTER HARTWELL WHITE did conduct financial transactions involving proceeds of specified unlawful activity, knowing that the transactions were designed to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity.

The defendant used various methods to launder approximately \$80 million in drug proceeds, including but not limited to:

- A1A Car Wash operations
- Saul Goodman & Associates attorney trust accounts
- Offshore shell company transactions
- Cash purchases of gambling chips

Sworn to before me and subscribed in my presence,

DEA Special Agent Hank Schrader

Badge #2187