

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA


**RECEIVED**

JUN 09 2026

Clerk, U.S. District and  
Bankruptcy Courts

Holding a Criminal Term

Grand Jury Sworn in on December 16, 2025

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO.</b>
	:	
	:	<b>GRAND JURY ORIGINAL</b>
	:	
<b>v.</b>	:	<b>VIOLATIONS:</b>
	:	
	:	<b>21 U.S.C. §§ 846 and 860(a)</b>
	:	<b>(Conspiracy to Distribute and Possess with</b>
<b>TEVIN MOODY,</b>	:	<b>Intent to Distribute 280 Grams or More of a</b>
<b>also known as "FATS,"</b>	:	<b>Mixture or Substance Containing a</b>
	:	<b>Detectable Amount of Cocaine Base and 500</b>
<b>GERALDO LANDY,</b>	:	<b>Grams or More of a Mixture or Substance</b>
<b>also known as "NARDO,"</b>	:	<b>Containing a Detectable Amount of Cocaine</b>
	:	<b>within 1,000 Feet of a Protected Location)</b>
	:	
<b>NORMAN MOORE,</b>	:	<b>21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), 860(a)</b>
<b>also known as "LEE,"</b>	:	<b>(Distribution of 28 Grams or More of a</b>
	:	<b>Mixture or Substance Containing a</b>
<b>LENON WRIGHT,</b>	:	<b>Detectable Amount of Cocaine Base within</b>
<b>also known as "PENNY,"</b>	:	<b>1,000 Feet of a Protected Location)</b>
	:	
<b>ALI MCSHAY,</b>	:	<b>21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii),</b>
<b>also known as "CHE,"</b>	:	<b>(b)(1)(C), 860(a)</b>
	:	<b>(Distribution of 28 Grams or More of a</b>
<b>LONNELL THOMAS,</b>	:	<b>Mixture or Substance Containing a</b>
<b>also known as "SYC,"</b>	:	<b>Detectable Amount of Cocaine Base and a</b>
	:	<b>Mixture or Substance Containing a</b>
<b>MARQUETTE PARIS,</b>	:	<b>Detectable Amount of Cocaine within 1,000</b>
<b>also known as "Q,"</b>	:	<b>Feet of a Protected Location)</b>
	:	
<b>JEREMIAH PRINCE,</b>	:	<b>21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), 860(a)</b>
<b>also known as "MY MY,"</b>	:	<b>(Possession with Intent to Distribute 28</b>
	:	<b>Grams or More of a Mixture or Substance</b>
	:	<b>Containing a Detectable Amount of Cocaine</b>
	:	<b>Base within 1,000 Feet of a Protected</b>
<b>JOSEPH MOORE,</b>	:	<b>Location)</b>
<b>also known as "JOE,"</b>	:	
	:	
<b>KIVARRIE GREENE,</b>	:	

<p>also known as "VARRIE,"</p> <p>DE'LONTE JACKSON, also known as "TAY,"</p> <p>DERRICK MANUEL, also known as "D," and</p> <p>MALIK HEARD, also known as "LEEK,"</p> <p style="text-align: center;">Defendants.</p>	<p>: 18 U.S.C. § 922(g)(1)</p> <p>: (Unlawful Possession of a Firearm and</p> <p>: Ammunition by a Person Convicted of a</p> <p>: Crime Punishable by Imprisonment for a</p> <p>: Term Exceeding One Year)</p> <p>: 22 D.C. Code § 4503(a)(1)</p> <p>: (Unlawful Possession of a Firearm</p> <p>: (Prior Conviction))</p> <p>: <b>FORFEITURE:</b></p> <p>: 21 U.S.C. §§ 853(a) and (p)</p> <p>: 18 U.S.C. § 924(d)</p> <p>: 28 U.S.C. § 2461(c)</p>
---	---

**INDICTMENT**

The Grand Jury charges that:

**COUNT ONE**

Between on or about August 1, 2024 through June 9, 2026, within the District of Columbia and elsewhere, **TEVIN MOODY** also known as "FATS," **GERALDO LANDY** also known as "NARDO," **NORMAN MOORE** also known as "LEE," **LENON WRIGHT** also known as "PENNY," **ALI MCSHAY** also known as "CHE," **LONNELL THOMAS** also known as "SYC," **MARQUETTE PARIS** also known as "Q," **JEREMIAH PRINCE** also known as "MY MY," [REDACTED] **JOSEPH MOORE** also known as "JOE," **KIVARRIE GREENE** also known as "VARRIE," **DE'LONTE JACKSON** also known as "TAY," **DERRICK MANUEL** also known as "D," **MALIK HEARD** also known as "LEEK," did knowingly and willfully combine, conspire, confederate, and agree together and with other persons both known and unknown to the Grand Jury, to unlawfully, knowingly, and intentionally distribute and possess with intent to distribute 280 grams or more of a mixture or substance containing a detectable amount of cocaine base, also known as "crack" and 500 grams or more of a mixture or substance containing a detectable amount of cocaine, both

Schedule II narcotic drug controlled substances, within one thousand feet of a protected location, that is, Hendley Elementary School, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(iii), (b)(1)(B)(ii), 860(a), and 846.

Quantity of Narcotics Involved in the Conspiracy:

With respect to **TEVIN MOODY also known as "FATS,"** his conduct as a member of the narcotics conspiracy charged in Count One, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged in Count One, involved 280 grams or more of a mixture or substance containing a detectable amount of cocaine base, also known as "crack," and 500 grams or more of a mixture or substance containing a detectable amount of cocaine, both Schedule II narcotic drug controlled substances, within one thousand feet of a protected location, that is, Hendley Elementary School, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(iii), (b)(1)(B)(ii), and 860(a).

With respect to **GERALDO LANDY also known as "NARDO,"** his conduct as a member of the narcotics conspiracy charged in Count One, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged in Count One, involved 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(ii).

With respect to **NORMAN MOORE also known as "LEE,"** his conduct as a member of the narcotics conspiracy charged in Count One, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged in Count One, involved 28 grams or more of a mixture or substance containing a detectable amount of cocaine base, also known as "crack," a Schedule II narcotic drug controlled substance, within one thousand feet of a protected location, that is, Hendley Elementary School, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), and 860(a).

With respect to **LENON WRIGHT also known as "PENNY,"** his conduct as a member of the narcotics conspiracy charged in Count One, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged in Count One, involved 280 grams or more of a mixture or substance containing a detectable amount of cocaine base, also known as "crack," a Schedule II narcotic drug controlled substance, within one thousand feet of a protected location, that is, Hendley Elementary School, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(iii), and 860(a).

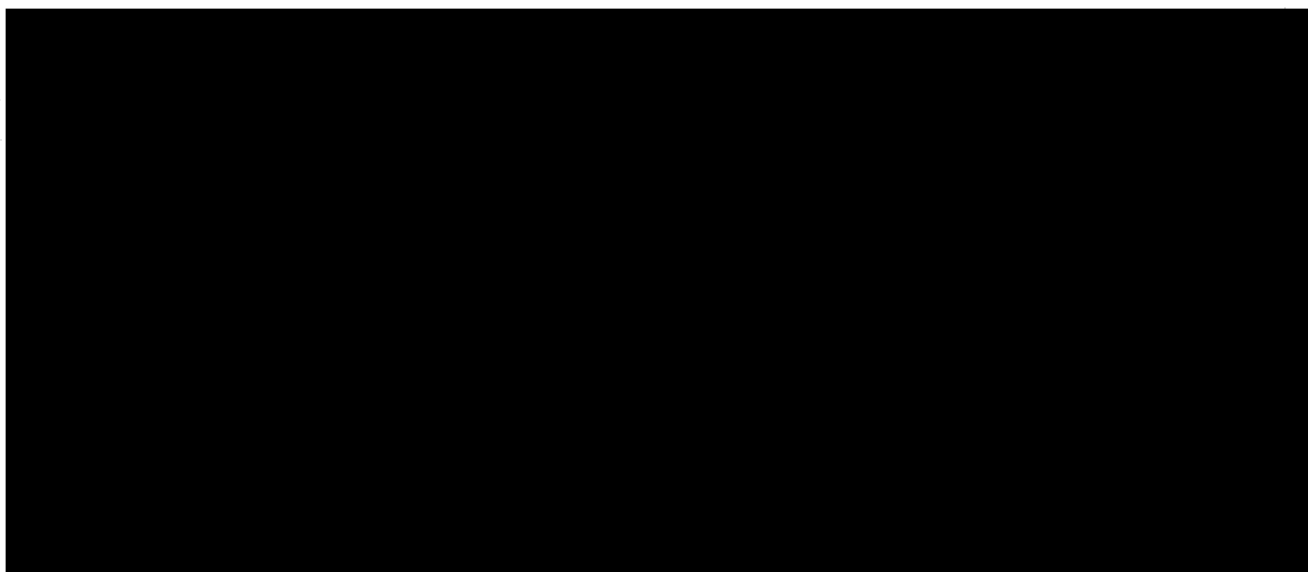
With respect to **ALI MCSHAY also known as "CHE,"** his conduct as a member of the narcotics conspiracy charged in Count One, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged in Count One, involved 28 grams or more of a mixture or substance containing a detectable amount of cocaine base, also known as "crack," a Schedule II narcotic drug controlled substance, within one thousand feet of a protected location, that is, Hendley Elementary School, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), and 860(a).

With respect to **LONNELL THOMAS also known as "SYC,"** his conduct as a member of the narcotics conspiracy charged in Count One, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged in Count One, involved 280 grams or more of a mixture or substance containing a detectable amount of cocaine base, also known as "crack," a Schedule II narcotic drug controlled substance, within one thousand feet of a protected location, that is, Hendley Elementary School, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(iii), and 860(a).

With respect to **MARQUETTE PARIS also known as "Q,"** his conduct as a member of the narcotics conspiracy charged in Count One, which includes the reasonably foreseeable conduct

of other members of the narcotics conspiracy charged in Count One, involved 280 grams or more of a mixture or substance containing a detectable amount of cocaine base, also known as "crack," a Schedule II narcotic drug controlled substance, within one thousand feet of a protected location, that is, Hendley Elementary School, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(iii), and 860(a).

With respect to **JEREMIAH PRINCE also known as "MY MY,"** his conduct as a member of the narcotics conspiracy charged in Count One, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged in Count One, involved 28 grams or more of a mixture or substance containing a detectable amount of cocaine base, also known as "crack," a Schedule II narcotic drug controlled substance, within one thousand feet of a protected location, that is, Hendley Elementary School, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), and 860(a).



With respect to **JOSEPH MOORE also known as "JOE,"** his conduct as a member of the narcotics conspiracy charged in Count One, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged in Count One, involved 28 grams or more

of a mixture or substance containing a detectable amount of cocaine base, also known as "crack," a Schedule II narcotic drug controlled substance, within one thousand feet of a protected location, that is, Hendley Elementary School, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), and 860(a).

With respect to **KIVARRIE GREENE also known as "VARRIE,"** his conduct as a member of the narcotics conspiracy charged in Count One, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged in Count One, involved a mixture or substance containing a detectable amount of cocaine base, also known as "crack," a Schedule II narcotic drug controlled substance, within one thousand feet of a protected location, that is, Hendley Elementary School, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(C), and 860(a).

With respect to **DE'LONTE JACKSON also known as "TAY,"** his conduct as a member of the narcotics conspiracy charged in Count One, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged in Count One, involved 28 grams or more of a mixture or substance containing a detectable amount of cocaine base, also known as "crack," a Schedule II narcotic drug controlled substance, within one thousand feet of a protected location, that is, Hendley Elementary School, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), and 860(a).

With respect to **DERRICK MANUEL also known as "D,"** his conduct as a member of the narcotics conspiracy charged in Count One, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged in Count One, involved 28 grams or more of a mixture or substance containing a detectable amount of cocaine base, also known as "crack," a Schedule II narcotic drug controlled substance, within one thousand feet of a protected location, that is, Hendley Elementary School, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), and

860(a).

With respect to **MALIK HEARD also known as "LEEK,"** his conduct as a member of the narcotics conspiracy charged in Count One, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged in Count One, involved a mixture or substance containing a detectable amount of cocaine base, also known as "crack," a Schedule II narcotic drug controlled substance, within one thousand feet of a protected location, that is, Hendley Elementary School, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(C), and 860(a).

**(Conspiracy to Distribute and Possess with Intent to Distribute 280 Grams or More of Cocaine Base And 500 Grams or More of Cocaine within 1,000 Feet of a Protected Location,** in violation of 21 U.S.C. §§ 846, 860(a))

### **COUNT TWO**

On or about June 12, 2025, within the District of Columbia, **TEVIN MOODY also known as "FATS,"** did unlawfully, knowingly, and intentionally distribute 28 grams or more of a mixture or substance containing a detectable amount of cocaine base, also known as "crack," a Schedule II narcotic controlled substance, within one thousand feet of a protected location, that is, Hendley Elementary School, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), and 860(a).

**(Distribution of 28 grams or More of a Mixture or Substance Containing a Detectable Amount of Cocaine Base within 1,000 Feet of a Protected Location,** in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), and 860(a)).

### **COUNT THREE**

On or about August 13, 2025, within the District of Columbia, **TEVIN MOODY also known as "FATS,"** did unlawfully, knowingly, and intentionally distribute 28 grams or more of a mixture or substance containing a detectable amount of cocaine base, also known as "crack," a Schedule II narcotic controlled substance, within one thousand feet of a protected location, that is, Hendley Elementary School, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), and 860(a).

**(Distribution of 28 grams or More of a Mixture or Substance Containing a Detectable Amount of Cocaine Base within 1,000 Feet of a Protected Location, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), and 860(a)).**

**COUNT FOUR**

On or about November 10, 2025, within the District of Columbia, **LENON WRIGHT also known as "PENNY,"** did unlawfully, knowingly, and intentionally distribute 28 grams or more of a mixture or substance containing a detectable amount of cocaine base, also known as "crack," a Schedule II narcotic controlled substance, within one thousand feet of a protected location, that is, Hendley Elementary School, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), and 860(a).

**(Distribution of 28 grams or More of a Mixture or Substance Containing a Detectable Amount of Cocaine Base within 1,000 Feet of a Protected Location, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), and 860(a)).**

**COUNT FIVE**

On or about December 3, 2025, within the District of Columbia, **LENON WRIGHT also known as "PENNY,"** did unlawfully, knowingly, and intentionally distribute 28 grams or more of a mixture or substance containing a detectable amount of cocaine base, also known as "crack," a Schedule II narcotic controlled substance, within one thousand feet of a protected location, that is, Hendley Elementary School, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), and 860(a).

**(Distribution of 28 grams or More of a Mixture or Substance Containing a Detectable Amount of Cocaine Base within 1,000 Feet of a Protected Location, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), and 860(a)).**

**COUNT SIX**

On or about January 22, 2026, within the District of Columbia, **LENON WRIGHT also known as "PENNY,"** did unlawfully, knowingly, and intentionally distribute 28 grams or more of a mixture or substance containing a detectable amount of cocaine base, also known as "crack," a Schedule II narcotic controlled substance, within one thousand feet of a protected location, that is, Hendley Elementary School, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), and 860(a).

**(Distribution of 28 grams or More of a Mixture or Substance Containing a Detectable Amount of Cocaine Base within 1,000 Feet of a Protected Location, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), and 860(a).**

**COUNT SEVEN**

On or about July 21, 2025, within the District of Columbia, **ALI MCSHAY** also known as **“CHE,”** did unlawfully, knowingly, and intentionally distribute 28 grams or more of a mixture or substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II narcotic controlled substance, within one thousand feet of a protected location, that is, Hendley Elementary School, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), and 860(a).

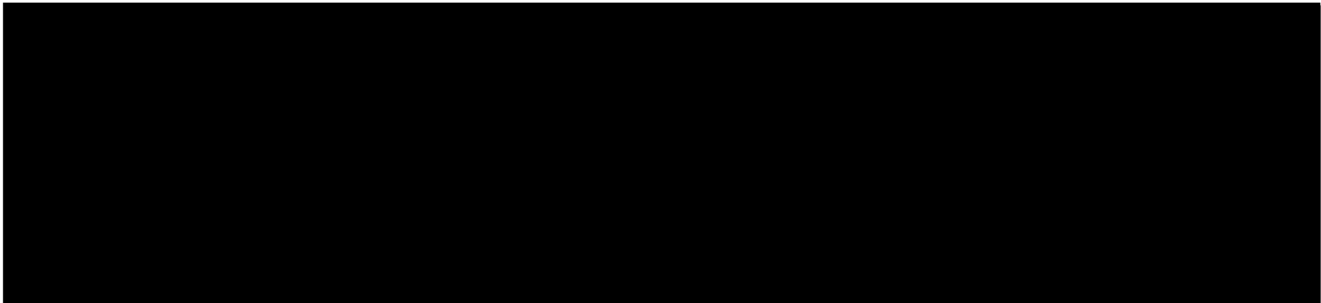
**(Distribution of 28 grams or More of a Mixture or Substance Containing a Detectable Amount of Cocaine Base within 1,000 Feet of a Protected Location, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), 860(a).**

**COUNT EIGHT**

On or about November 21, 2025, within the District of Columbia, **JEREMIAH PRINCE** also known as **“MY MY,”** did unlawfully and knowingly possess with intent to distribute 28 grams or more of a mixture and substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II narcotic controlled substance, within one thousand feet of a protected location, that is, Hendley Elementary School, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), and 860(a).

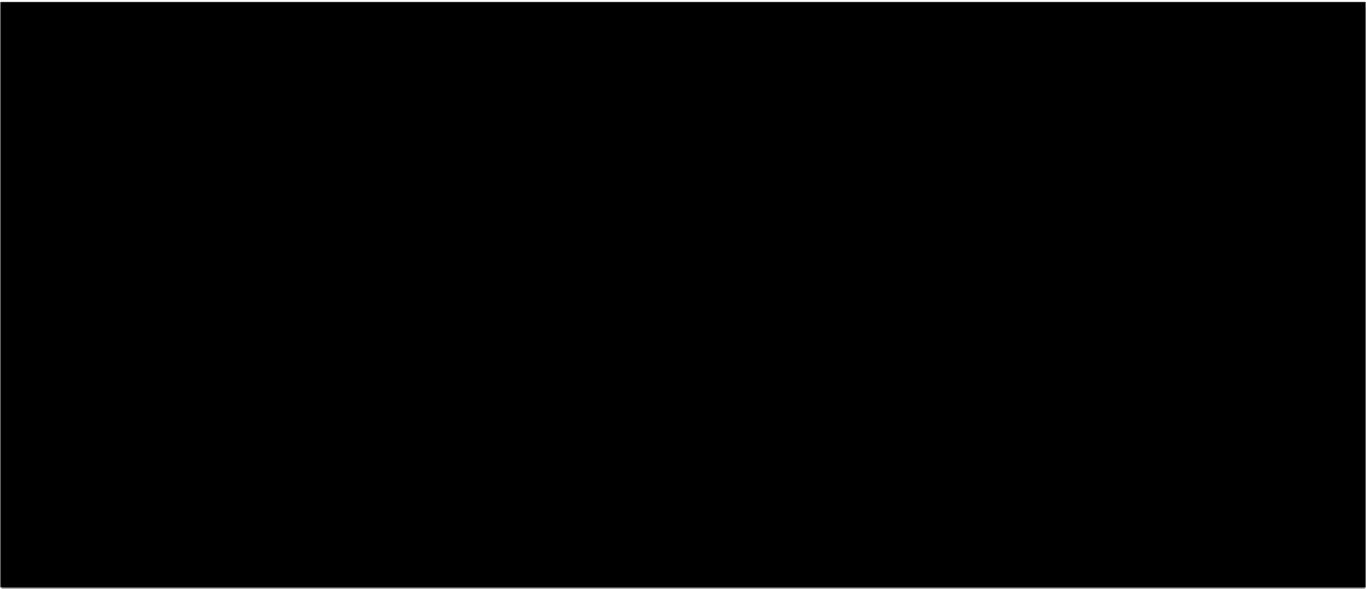
**(Possession With Intent to Distribute 28 grams or More of a Mixture or Substance Containing a Detectable Amount of Cocaine Base within 1,000 Feet of a Protected Location, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), 860(a).**

**COUNT NINE**

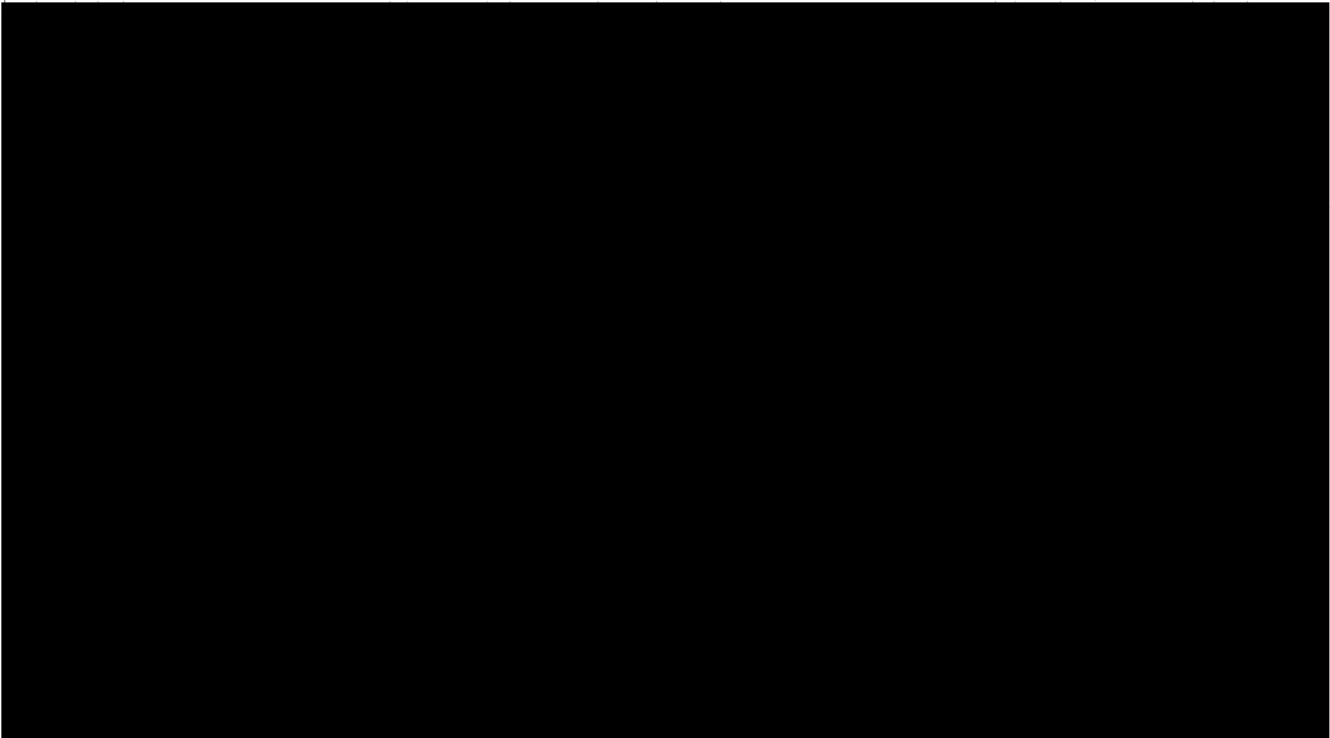




**COUNT TEN**



**COUNT ELEVEN**



### COUNT TWELVE

On or about November 14, 2025, within the District of Columbia, **LONNELL THOMAS**, also known as “**SYC**,” did unlawfully, knowingly, and intentionally distribute 28 grams or more of a mixture or substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II narcotic controlled substance, within one thousand feet of a protected location, that is, Hendley Elementary School, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), and 860(a).

**(Distribution of 28 grams or More of a Mixture or Substance Containing a Detectable Amount of Cocaine Base within 1,000 Feet of a Protected Location**, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), 860(a)).

### COUNT THIRTEEN

On or about December 4, 2025, within the District of Columbia, **LONNELL THOMAS**, also known as “**SYC**,” did unlawfully, knowingly, and intentionally distribute 28 grams or more of a mixture or substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II narcotic controlled substance, within one thousand feet of a protected location, that is, Hendley Elementary School, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), and 860(a).

**(Distribution of 28 grams or More of a Mixture or Substance Containing a Detectable Amount of Cocaine Base within 1,000 Feet of a Protected Location**, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), 860(a)).

### COUNT FOURTEEN

On or about January 22, 2026, within the District of Columbia, **LONNELL THOMAS**, also known as “**SYC**,” did unlawfully, knowingly, and intentionally distribute 28 grams or more of a mixture or substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II narcotic controlled substance, within one thousand feet of a protected location, that is, Hendley Elementary School, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), and 860(a).

**(Distribution of 28 grams or More of a Mixture or Substance Containing a Detectable Amount of Cocaine Base within 1,000 Feet of a Protected Location**, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), 860(a)).

### COUNT FIFTEEN

On or about June 25, 2025, within the District of Columbia, **MARQUETTE PARIS also known as "Q,"** did unlawfully, knowingly, and intentionally distribute 28 grams or more of a mixture or substance containing a detectable amount of cocaine base, also known as "crack," a Schedule II narcotic controlled substance, within one thousand feet of a protected location, that is, Hendley Elementary School, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), and 860(a).

**(Distribution of 28 grams or More of a Mixture or Substance Containing a Detectable Amount of Cocaine Base within 1,000 Feet of a Protected Location,** in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), 860(a)).

### COUNT SIXTEEN

On or about July 16, 2025, within the District of Columbia, **MARQUETTE PARIS also known as "Q,"** did unlawfully, knowingly, and intentionally distribute 28 grams or more of a mixture or substance containing a detectable amount of cocaine base, also known as "crack," a Schedule II narcotic controlled substance, within one thousand feet of a protected location, that is, Hendley Elementary School, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), and 860(a).

**(Distribution of 28 grams or More of a Mixture or Substance Containing a Detectable Amount of Cocaine Base within 1,000 Feet of a Protected Location,** in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), 860(a)).

### COUNT SEVENTEEN

On or about August 15, 2025, within the District of Columbia, **MARQUETTE PARIS also known as "Q,"** did unlawfully, knowingly, and intentionally distribute 28 grams or more of a mixture or substance containing a detectable amount of cocaine base, also known as "crack," a Schedule II narcotic controlled substance, within one thousand feet of a protected location, that is, Hendley Elementary School, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), and 860(a).

**(Distribution of 28 grams or More of a Mixture or Substance Containing a Detectable Amount of Cocaine Base within 1,000 Feet of a Protected Location,** in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), 860(a)).

### COUNT EIGHTEEN

On or about October 22, 2025, within the District of Columbia, **JOSEPH MOORE** also known as “**JOE**,” did unlawfully, knowingly, and intentionally possess with intent to distribute 28 grams or more of a mixture or substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II narcotic controlled substance, within one thousand feet of a protected location, that is, Hendley Elementary School, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), and 860(a).

**(Possession with Intent to Distribute 28 grams or More of a Mixture or Substance Containing a Detectable Amount of Cocaine Base within 1,000 Feet of a Protected Location, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii), 860(a)).**

### COUNT NINETEEN

On or about April 14, 2025, within the District of Columbia, **KIVARRIE GREENE** also known as “**VARRIE**,” knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, in the Superior Court for the District of Columbia Criminal Case Number 2024 CF2 005353, did unlawfully and knowingly possess 18 rounds of 9mm ammunition, which had been possessed, shipped and transported in and affecting interstate and foreign commerce.

**(Unlawful Possession of Ammunition by a Person Convicted of a Crime Punishable by Imprisonment for a Term Exceeding One Year, in violation of Title 18, United States Code, Section 922(g)(1)).**

### COUNT TWENTY

On or about April 14, 2025, within the District of Columbia, **KIVARRIE GREENE** also known as “**VARRIE**,” knowing he had previously been convicted in any court of a crime punishable by imprisonment for a term exceeding one year, that is, in the Superior Court for the District of Columbia Criminal Case No. 2024 CF2 005353, owned, kept, and had within his possession and control, a firearm, that is, a Polymer 80 9mm firearm with no serial number.

**(Unlawful Possession of a Firearm (Prior Conviction)),** in violation of Title 22, D.C. Code, Section 4503(a)(1))

**COUNT TWENTY-ONE**

On or about July 29, 2025, within the District of Columbia, **KIVARRIE GREENE also known as "VARRIE,"** knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, in the Superior Court for the District of Columbia Criminal Case Number 2024 CF2 005353, did unlawfully and knowingly receive and possess firearms, that is, one tan in color Glock 19X with serial number CAHN192 and one black in color Glock 17 with serial number BSHM014, and did unlawfully and knowingly receive and possess 40 rounds of 9mm ammunition, all of which had been possessed, shipped and transported in and affecting interstate and foreign commerce.

**(Unlawful Possession of a Firearm and Ammunition by a Person Convicted of a Crime Punishable by Imprisonment for a Term Exceeding One Year,** in violation of Title 18, United States Code, Section 922(g)(1)).

**FORFEITURE ALLEGATION**

Upon conviction of the offenses alleged in Counts One through Eighteen of this Indictment, the defendants shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a), any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of these offenses; and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of these offenses.

Upon conviction of the offenses alleged in Counts Nineteen through Twenty-One of this Indictment, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in or used in the knowing commission of the offense.

### SPECIFIC PROPERTY SUBJECT TO FORFEITURE

The property subject to forfeiture includes, but is not limited to, the following:

- 1) One Polymer 80 9mm firearm with no serial number;
- 2) One tan in color Glock 19X firearm, serial number CAHN192;
- 3) One black in color Glock 17 firearm, serial number BSHM014;
- 4) 58 rounds of 9mm ammunition.

### MONEY JUDGMENT

The United States will also seek a forfeiture money judgment against the defendants equal to the value of any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of these offenses.

### SUBSTITUTE ASSETS

If any of the property described above as being subject to forfeiture, 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 that cannot be divided without difficulty;

the defendants shall forfeit to the United States any other property of the defendants, up to the value of the property described above, pursuant to 21 U.S.C. § 853(p).

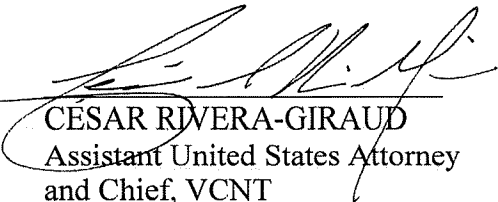
**(Criminal Forfeiture, pursuant to Title 18, United States Code, Section 924(d), Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c))**

**A TRUE BILL:**

**FOREPERSON.**

**JEANINE FERRIS PIRRO  
UNITED STATES ATTORNEY**

By:

  
**CÉSAR RIVERA-GIRAUD**  
Assistant United States Attorney  
and Chief, VCNT