

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION

FILED-CLERK
U.S. DISTRICT COURT
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TEXAS-EASTERN

UNITED STATES OF AMERICA

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§
§
§
§

V.

NO. 5:13CR 25
JUDGES SCHNEIDER/CRAVEN

JONATHAN JURUSO LEE

BY _____

INDICTMENT

SEALED

THE UNITED STATES GRAND JURY CHARGES:

Count 1

Violation: 21 U.S.C. § 841(a)(1)
(Possession with intent to distribute
cocaine)

On or about May 19, 2011, in the Eastern District of Texas, **Jonathan Juruso Lee**, Defendant herein, knowingly and intentionally possessed with intent to distribute approximately 474 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule I controlled substance.

In violation of 21 U.S.C. § 841(a)(1).

Count 2

Violation: 18 U.S.C. § 924(c) (Use, carrying and possession of firearms and ammunition during and in furtherance of a drug trafficking crime)

On or about May 19, 2011, in the Eastern District of Texas, **Jonathan Jaruso**

Lee, Defendant herein, did knowingly and intentionally use and carry and possess firearms and ammunition, to wit:

1. a CMMG AR15-type .223 or 5.56mm caliber semi-automatic rifle;
2. a Taurus PT140 .40S&W caliber semi-automatic handgun;
3. multiple rounds of .223 or 5.56mm caliber ammunition; and
4. multiple rounds of .40S&W caliber ammunition;

during and in relation to and in furtherance of a felony drug trafficking crime for which he may be prosecuted in a court of the United States, that is possession with intent to distribute cocaine, all in violation of 21 U.S.C. § 841(a)(1), as alleged in Count 1.

In violation of 18 U.S.C. § 924(c).

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

Pursuant to 21 U.S.C. § 853 and 28 U.S.C. § 2461

As the result of committing one or more of the foregoing offenses alleged in this indictment, the defendants herein shall forfeit to the United States pursuant to 21 U.S.C. § 853 and 28 U.S.C. § 2461:

1. any property constituting, or derived from, and proceeds the defendants obtained, directly or indirectly, as the result of such violation;
2. any of the defendants' property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation, and/or,
3. any and all firearms, ammunition and accessories seized from defendants, including but not limited to the following:

Firearms:

1. CMMG AR15-type semi-automatic rifle, serial number A4797;
2. Taurus PT140 semi-automatic handgun, serial number SCU59726;
3. Various rounds of .223 or 5.56mm ammunition; and
4. Various rounds of 40S&W ammunition.

CASH PROCEEDS

\$50,000.00 in United States currency and all interest and proceeds traceable thereto, in that such sum in aggregate is proceeds obtained directly or indirectly as a result of the commission of the aforesaid violations.

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:

1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with a third person;
3. has been placed beyond the jurisdiction of the court;
4. has been substantially diminished in value; or
5. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of defendants up to the value of the above forfeitable property, including but not limited to all property, both real and personal owned by defendants.

By virtue of the commission of the offenses alleged in this indictment, any and all interest the defendants have in the above-described property is vested in the United States and hereby forfeited to the United States pursuant to 21 U.S.C. § 853 and 28 U.S.C. § 2461.

A TRUE BILL,

11-20-13
Date

K
FOREPERSON OF THE GRAND JURY

JOHN M. BALES
UNITED STATES ATTORNEY

D. Ryan Locker
RYAN LOCKER
ASSISTANT U.S. ATTORNEY

NOTICE OF PENALTY

Count One

Violation: 21 U.S.C. § 841(a)(1) (Possession with intent to distribute less than 500 grams of cocaine)

Penalty: Imprisonment not more than 20 years; a fine not to exceed \$1,000,000, or both; and a term of supervised release of at least 3 years.

Special Assessment: \$100.00

Count Two

Violation: 18 U.S.C. § 924(c) (Use, carrying and possession of a firearm during and in furtherance of a drug trafficking crime)

Penalty: Imprisonment for not less than 5 years which must be served consecutively to any other term of imprisonment; a fine not to exceed \$250,000, or both; and a term of supervised release of not more than 3 years.

Special Assessment: \$100.00