

Jan 3, 2020
ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S.D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
20-20001-CR-COOKE/GOODMAN
CASE NO. _____

21 U.S.C. § 846
21 U.S.C. § 841(a)(1)
18 U.S.C. § 1956(h)
18 U.S.C. § 982(a)
21 U.S.C. § 853(a)

UNITED STATES OF AMERICA

v.

MICHAEL SEQUEIRA,
a/k/a "leftcoastenv,"

Defendant.

INDICTMENT

The Grand Jury charges that:

COUNT 1
Conspiracy to Distribute a Controlled Substance
(21 U.S.C. § 846)

Beginning in or around January of 2017, and continuing through in and around July of 2018, with the exact dates being unknown to the Grand Jury, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

MICHAEL SEQUEIRA,
a/k/a "leftcoastenv,"

did knowingly and willfully combine, conspire, confederate, and agree with other persons unknown to the Grand Jury, to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846.

The controlled substance involved in the conspiracy attributable to the defendant as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 50

grams or more of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance in violation of Title 21, United States Code, Section 841(b)(1)(A)(viii).

COUNT 2
Distribution of Methamphetamine
(21 U.S.C. § 841(a)(1))

On or about February 13, 2018, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

MICHAEL SEQUEIRA,
a/k/a “leftcoastenv,”

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that this violation involved 5 grams or more of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance in violation of Title 21, United States Code, Section 841(b)(1)(B)(viii).

COUNT 3
Distribution of Methamphetamine
(21 U.S.C. § 841(a)(1))

On or about July 24, 2018, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

MICHAEL SEQUEIRA,
a/k/a “leftcoastenv,”

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that this violation involved 50 grams or more of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance in violation of Title 21, United States Code, Section 841(b)(1)(A)(viii).

COUNT 4
Conspiracy to Commit Money Laundering
(18 U.S.C. §1956(h))

Beginning in and around February 2018, and continuing through in and around July of 2018, with the exact dates being unknown to the Grand Jury, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

MICHAEL SEQUEIRA,
a/k/a “leftcoastenv,”

did knowingly and willfully combine, conspire, confederate, and agree with other persons unknown to the Grand Jury, to commit certain offenses against the United States, that is, to knowingly conduct a financial transaction affecting interstate and foreign commerce, which transaction involved the proceeds of specified unlawful activity, knowing that the property involved in the transaction represented the proceeds of some form of unlawful activity, and knowing that the transaction was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

It is further alleged that the specified unlawful activity is the felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise dealing in a controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), punishable under the laws of the United States.

All in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE ALLEGATIONS
(21 U.S.C. § 853)
(18 U.S.C. § 982(a)(1))

1. The allegations of this Indictment are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendant, **MICHAEL SEQUEIRA, a/k/a “leftcoastenv,”** has an interest.

2. Upon conviction of a violation of Title 21, United States Code, Sections 846 and/or 841, as alleged in this Indictment, the defendant shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation, pursuant to Title 21, United States Code, Section 853(a).

3. Upon conviction of a conspiracy to violate Title 18, United States Code, Section 1956, as alleged in this Indictment, the defendant shall forfeit to the United States of America any property, real or personal, involved in such offense, and any property traceable to such property, pursuant to Title 18, United States Code, Section 982(a)(1).

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

- 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).

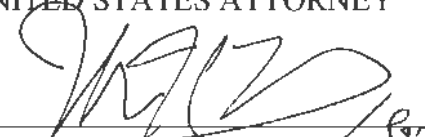
All pursuant to Title 18, United States Code, Section 982(a)(1) and Title 21, United States Code, Section 853, as incorporated by Title 18, United States Code, Section 982(b)(1).

A TRUE BILL

FOREPERSON



ARIANA FAJARDO ORSHAN
UNITED STATES ATTORNEY



MONIQUE BOTERO
ASSISTANT UNITED STATES ATTORNEY