

FILED

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

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US DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO, FLORIDA

UNITED STATES OF AMERICA

v.

CASE NO. 6:18-cr-159-ORL-41-KRS
18 U.S.C. § 1956(h)

CHARLTON MORRIS

INFORMATION

The United States Attorney charges:

COUNT ONE

Beginning in or about February 2012, and continuing to in or about October 2014, in the Middle District of Florida and elsewhere, the defendant,

CHARLTON MORRIS

did knowingly and willfully combine, conspire, confederate and agree together and with others known and unknown, to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is wire fraud, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property

involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(B)(i).

All in violation of 18 U.S.C. § 1956(h).

FORFEITURE

1. The allegations contained in Count One are incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 982(a)(1).

2. Upon conviction of a violation of 18 U.S.C. § 1956(h), the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in such offense, or any property traceable to such property.


3. The property to be forfeited includes, but is not limited to, the following: a 2014 Mercedes Benz C250 Coupe, VIN #WDDGJ4HB4EG2989372008, Toshiba laptop computer (S/N 6C320384Q), and a forfeiture money judgment in the amount of \$388,104, representing the amount of proceeds the defendant obtained from the offense.

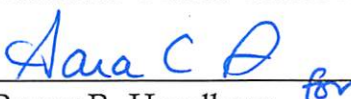
4. If any of the property described above, as a result of any act or omission of the defendant:

- 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 shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1).

MARIA CHAPA LOPEZ
United States Attorney

By: 
Karen L. Gable
Assistant United States Attorney

By: 
Roger B. Handberg
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Chief, Orlando Division