

FILED

AUG -2 2022

U.S. DISTRICT COURT-WVND
WHEELING, WV 26003

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA

UNITED STATES OF AMERICA,

v.

SOLOMON ELI WATTERS, and
CHELSEA MARION BANKS.

Defendants.

Criminal No: 5:22-CR-30

Violations: 18 U.S.C. § 922(g)(1)
18 U.S.C. § 924(a)(2)
21 U.S.C. § 841(a)(1)
21 U.S.C. § 841(b)(1)(A)(vi)
21 U.S.C. § 841(b)(1)(C)
21 U.S.C. § 846

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Conspiracy to Distribute and Possess with the Intent to Distribute
Cocaine Base and 400 Grams or More of Fentanyl)

During a period commencing on or about March 8, 2021, and ending on or about February 9, 2022, in Ohio County, within the Northern District of West Virginia, and elsewhere, defendants **SOLOMON ELI WATTERS and CHELSEA MARION BANKS**, did unlawfully, knowingly and intentionally combine, conspire, confederate, agree and have a tacit understanding to violate Title 21, United States Code, Section 841(a)(1). It was a purpose and object of the conspiracy to possess with intent to distribute and distribute a mixture and substance containing a detectable amount of cocaine base, also known as "crack," a Schedule II controlled substance, and 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(b)(1)(A)(vi), and 841(b)(1)(C).

COUNT TWO

(Unlawful Possession of a Firearm)

On or about February 8, 2022, in Ohio County, in the Northern District of West Virginia, defendant **SOLOMON ELI WATTERS**, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, that is the felony offense of Aggravated Assault, on August 20, 2020, in the Court of Common Pleas, Cuyahoga County, Ohio, in case number CR-19-644872-A, did knowingly possess a firearm, that is a Walther, model PK380, .380 caliber pistol, serial number WB100646, said firearm having been shipped and transported in interstate commerce; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT THREE

(Possession with Intent to Distribute Cocaine Base)

On or about February 8, 2022, in Ohio County, in the Northern District of West Virginia, defendants **SOLOMON ELI WATTERS and CHELSEA MARION BANKS**, did unlawfully, knowingly, intentionally, and without authority, possess with the intent to distribute a mixture and substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FOUR

(Unlawful Possession of a Firearm)

On or about February 8, 2022, in Ohio County, in the Northern District of West Virginia, defendant **SOLOMON ELI WATTERS**, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, that is the felony offense of Aggravated Assault, on August 20, 2020, in the Court of Common Pleas, Cuyahoga County, Ohio, in case number CR-19-644872-A, did knowingly possess a firearm, that is a Beretta, model PAX, 9x19mm caliber pistol, serial number A105971X, and a Glock, model 19, 9x19mm caliber pistol, serial number BATS707, said firearms having been shipped and transported in interstate commerce; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

FORFEITURE ALLEGATION

Controlled Substance Act

Pursuant to Title 21, United States Code, Section 853 and Title 21, United States Code, Section 841, the government will seek the forfeiture of property as part of the sentence imposed in this case; that is, the forfeiture of any property used, or intended to be used, to commit or to facilitate the commission of the above referenced offenses, and any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such offenses, including, but not limited to, the following specified property:

1. \$208,860 in United States Currency seized during the execution of a search warrant at Guardian Storage in Washington, Pennsylvania, on February 9, 2022;
2. \$3,556 in United States Currency seized from SOLOMON ELI WATTERS on February 8, 2022; and
3. 2012 White Audi A7, Ohio Registration JMR 2527, Vehicle Identification Number WAUYGAFC8CN146334.

Gun Control Act

Pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d)(1), the government will seek the forfeiture of any firearm and any ammunition involved in or used in any knowing violation of Title 18, United States Code, Section 922(g)(1), Unlawful Possession of a Firearm, including, but not limited to, the following specified property:

1. Walther, model PK380, .380 caliber pistol, serial number WB100646, and accompanying magazine and ammunition seized during a traffic stop on February 8, 2022;

2. Beretta, model PAX, 9x19mm caliber pistol, serial number A105971X, and accompanying magazine and ammunition seized during a residential search on February 8, 2022;
3. 50-round, 9mm magazine seized during a residential search on February 8, 2022;
4. One (1) box of Hornady Critical Defense 9mm ammunition (11 rounds) seized during a residential search on February 8, 2022;
5. One (1) box of “Bronze” ammunition (50 rounds) seized during a residential search on February 8, 2022; and
6. One (1) round of Blazer 9mm ammunition seized during a residential search on February 8, 2022.

A True Bill,

/s/
Grand Jury Foreperson

/s/William Ihlenfeld
WILLIAM IHLENFELD
United States Attorney

Shawn M. Adkins
Assistant United States Attorney