FILED

UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA FORT MYERS DIVISION

2022 JUL 13 PM 5: 06

UNITED STATES OF AMERICA

V.

MIDDLE DISTRICT OF FLORIDA FORT MYERS, FLORIDA CASE NO. 2: 22 CRUPT-SPC-KCL 18 U.S.C. § 1958(a)

MARVIN HARRIS, JR., aka MESH, and LATREL JACKSON, aka KOBE

INDICTMENT

The Grand Jury charges:

COUNT ONE

Beginning on an unknown date, but no later than on or about October 28, 2019, and continuing through on or about November 2, 2019, in the Middle District of Florida and elsewhere, the defendants,

MARVIN HARRIS, JR., aka MESH, and LATREL JACKSON, aka KOBE,

an individual D.S., and others known and unknown to the Grand Jury, conspired to travel and cause another to travel in interstate commerce from the State of Illinois to the State of Florida, with the intent that the murder of another person be committed in violation of the laws of the State of Florida as consideration for a promise and agreement to pay money and other items of pecuniary value. The foregoing resulted in the death and murder of the individual K.U. on or about November 2, 2019, within the Middle District of Florida.

In violation of 18 U.S.C. § 1958(a).

COUNT TWO

On or about October 28, 2019, in the Middle District of Florida and elsewhere, the defendant,

MARVIN HARRIS, JR., aka MESH,

did cause another to travel in interstate commerce from the State of Illinois to the State of Florida, with the intent that the murder of another person be committed in violation of the laws of the State of Florida as consideration for a promise and agreement to pay money and other items of pecuniary value. The foregoing resulted in the death and murder of the individual K.U. on or about November 2, 2019, within the Middle District of Florida.

In violation of 18 U.S.C. § 1958(a).

COUNT THREE

On or about October 28, 2019, in the Middle District of Florida and elsewhere, the defendant,

LATREL JACKSON, aka KOBE,

traveled in interstate commerce from the State of Illinois to the State of Florida, with the intent that the murder of another person be committed in violation of the laws of the State of Florida as consideration for a promise and agreement to pay money and other items of pecuniary value. The foregoing resulted in the death and murder of the individual K.U. on or about November 2, 2019, within the Middle District of Florida.

In violation of 18 U.S.C. § 1958(a).

FORFEITURE

- 1. The allegations contained in Counts One through Three are incorporated by reference for the purpose of alleging forfeiture, pursuant to provisions of 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).
- 2. Upon conviction of a violation of 18 U.S.C. § 1958, the defendants shall forfeit to the United States of America, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds

traceable to the violation, and pursuant to 18 U.S.C. § 924 and 28 U.S.C. § 2461(c), any firearms and ammunition involved or used in the violation.

- 3. If any of the property described above, 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 person;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or
 - has been commingled with other property which cannot be subdivided without difficulty;

the United States shall be entitled to forfeiture of substitute property under the provisions of 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

A TRUE BILL,

Foreperson

ROGER B. HANDBERG

United States Attorney

By: $\underline{\checkmark}$

Michael V. Leeman

Assistant United States Attorney

By:

Jesus M. Casas

Assistant United States Attorney

Chief, Fort Myers Division

No. 2:22-cr-

| UNITED STATES DISTRICT COURT Middle District of Florida Fort Myers Division | |
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| THE UNITED STATES OF AMERICA | |
| vs. | |
| MARVIN HARRIS, JR., aka MESH, and LATREL JACKSON, aka KOBE | |
| INDICTMENT | |
| Violations: | |
| 18 U.S.C. § 1958(a) | |
| A true bill, | |
| roreperson | |
| Filed in open court this 13th day | |
| of July, 2022. | |
| Clerk | |
| Bail \$ | |