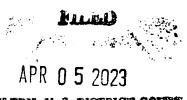
UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA TAMPA DIVISION



UNITED STATES OF AMERICA

TERK, U. S. DISTRICT COURT TOUDLE DESTRUCT DE SLORIMA TOUTER SUSIENA

v.

CASE NO. 8:23-cr-120-VHC-AEP 21 U.S.C. § 846

21 U.S.C. § 841

CIERA ANDERSON and, TEQUAN RAMSEY

INDICTMENT

The Grand Jury charges:

COUNT ONE

Beginning on an unknown date, but not later than on or about December 8, 2022, and continuing through on or about March 3, 2023, in the Middle District of Florida, and elsewhere, the defendants,

CIERA ANDERSON and TEQUAN RAMSEY,

did knowingly and willfully conspire with other persons, both known and unknown to the Grand Jury, to possess with intent to distribute a controlled substance. The violation involved 100 grams or more of heroin, and 50 grams or more of methamphetamine, both Schedule II controlled substances.

All in violation of 21 U.S.C. §§ 846 and 841(b)(1)(A) and (b)(1)(B).

COUNT TWO

On or about September 13, 2022, in the Middle District of Florida, the defendant,

CIERA ANDERSON,

did knowingly and intentionally distribute and possess with intent to distribute a controlled substance. The violation involved a mixture or substance with a detectable amount of heroin, and a mixture or substance with a detectable amount of cocaine, both Schedule II controlled substances.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C) and 18 U.S.C. § 2.

COUNT THREE

On or about September 21, 2022, in the Middle District of Florida, the defendant,

CIERA ANDERSON,

did knowingly and intentionally distribute and possess with intent to distribute a controlled substance. The violation involved a mixture or substance containing a detectable amount of heroin, a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C) and 18 U.S.C. § 2.

COUNT FOUR

On or about December 8, 2022, in the Middle District of Florida, the defendants,

CIERA ANDERSON and TEQUAN RAMSEY,

did knowingly and intentionally distribute, and possess with intent to distribute, a controlled substance. The violation involved a mixture or substance containing a detectable amount of heroin, a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C) and 18 U.S.C. § 2.

COUNT FIVE

On or about January 13, 2023, in the Middle District of Florida, the defendants,

CIERA ANDERSON and TEQUAN RAMSEY,

did knowingly and intentionally distribute and possess with intent to distribute, a controlled substance. The violation involved a mixture or substance containing 50 grams or more of methamphetamine, and a mixture or substance containing a detectable amount of heroin, both Schedule II controlled substances.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)and(C), and 18 U.S.C. § 2.

COUNT SIX

On or about March 3, 2023, in the Middle District of Florida, the defendants, CIERA ANDERSON and TEQUAN RAMSEY,

did knowingly and intentionally distribute and possess with intent to distribute, a controlled substance. The violation involved 50 grams or more of methamphetamine, a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B) and 18 U.S.C. § 2.

FORFEITURE

- 1. The allegations contained in Counts One through Six are incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of 21 U.S.C. § 853.
- 2. Upon conviction of a violation of 21 U.S.C. §§ 841 and/or 846, the defendants, shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a)(1) and (2), any property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as a 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.
- 3. If any of the property described above, as a result of any acts or omissions 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).

A TRUE BILL,

Foreperson

ROGER B. HANDBERG United States Attorney

By:

Maria Guzman

Assistant United States Attorney

By:

James C. Preston, Jr.

Assistant United States Attorney Chief, Violent Crimes and Narcotics

Section

Clerk

Bail \$____