

FJN:AA/IC/JRS
F. #2022R00230

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

INDICTMENT

- against -

ARIANA CHARLES,
also known as "A" and
"Almighty A,"

Defendant.

Cr. No. 24-CR-8
(T. 18, U.S.C., §§ 371, 924(d)(1),
933(a)(1), 933(a)(2), 933(b), 934(a)(1),
2 and 3551 et seq.; T. 21, U.S.C.,
§§ 841(a)(1), 841(b)(1)(C), 846, 853(a)
and 853(p); T. 28, U.S.C., § 2461(c))

Judge Dora Lizette Irizarry
Magistrate Judge Robert M. Levy

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THE GRAND JURY CHARGES:

COUNT ONE
(Firearms Trafficking Conspiracy)

1. In or about and between March 2022 and August 2022, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ARIANA CHARLES, also known as "A" and "Almighty A," together with others, did knowingly and willfully conspire to engage in the business of dealing in firearms without being a licensed importer, licensed manufacturer or licensed dealer, and in the course of such business, to ship, transport and receive one or more firearms in interstate and foreign commerce, contrary to Title 18, United States Code, Section 922(a)(1)(A).

2. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendant ARIANA CHARLES, together with others, committed and caused to be committed, among others, the following:

OVERT ACTS

- (a) On or about May 4, 2022, CHARLES telephoned a co-conspirator (“CC-1”), an individual whose identity is known to the Grand Jury.
- (b) On or about May 17, 2022, an undercover law enforcement officer (the “UC”) met with CHARLES and CC-1 in Brooklyn, New York.
- (c) On or about May 17, 2022, CHARLES provided her telephone number to the UC.
- (d) On or about May 17, 2022, CHARLES sold two semi-automatic pistols to the UC in Brooklyn, New York.
- (e) On or about June 16, 2022, CHARLES sold a semi-automatic rifle to the UC in Brooklyn, New York.
- (f) On or about July 19, 2022, CHARLES sold a shotgun to the UC in Brooklyn, New York.
- (g) On or about August 2, 2022, CHARLES sold two semi-automatic pistols and one semi-automatic rifle to the UC in Brooklyn, New York.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNT TWO
(Firearms Trafficking)

3. In or about and between June 25, 2022 and August 2, 2022, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ARIANA CHARLES, also known as “A” and “Almighty A,” together with others, did knowingly and intentionally (a) ship, transport, transfer, cause to be transported and otherwise dispose of one or more firearms to another person, in or otherwise affecting

interstate and foreign commerce, knowing and having reasonable cause to believe that the use, carrying and possession of a firearm by the recipient would constitute a felony; and (b) receive from another person one or more firearms, in and affecting interstate and foreign commerce, knowing or having reasonable cause to believe that such receipt would constitute a felony.

(Title 18, United States Code, Sections 933(a)(1), 933(a)(2), 933(b), 2 and 3551 et seq.)

COUNT THREE

(Conspiracy to Distribute and Possess with Intent to Distribute Cocaine Base and Fentanyl)

4. In or about and between May 2022 and June 2022, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ARIANA CHARLES, also known as “A” and “Almighty A,” together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) a substance containing N-phenyl-N-[1-(2-phenylethyl)-4 piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance; and (b) a substance containing cocaine base, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Sections 846 and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT FOUR

(Distribution and Possession with Intent to Distribute Cocaine Base)

5. In or about and between May 2022 and June 2022, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ARIANA CHARLES, also known as “A” and “Almighty A,” together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT FIVE

(Distribution and Possession with Intent to Distribute Fentanyl)

6. In or about and between May 2022 and June 2022, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ARIANA CHARLES, also known as “A” and “Almighty A,” together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing fentanyl, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT ONE

7. The United States hereby gives notice to the defendant that, upon her conviction of the offense charged in Count One, the government will seek forfeiture in

accordance with Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), which require the forfeiture of any firearm or ammunition involved in or used in any knowing violation of Title 18, United States Code, Section 922 or Section 924.

8. If any of the above-described forfeitable property, 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;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 924(d)(1); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT TWO

9. The United States hereby gives notice to the defendant that, upon her conviction of the offense charged in Count Two, the government will seek forfeiture in accordance with Title 18, United States Code, Sections 924(d) and 934(a)(1), and Title 28, United States Code, Section 2461(c), which require the forfeiture of: (a) any property

constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense; (b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense; and (c) any firearm or ammunition involved in or used in any violation of any criminal law of the United States.

10. If any of the above-described forfeitable property, 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;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 924(d)(1) and 934(a)(1); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

**CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS THREE THROUGH FIVE**

11. The United States hereby gives notice to the defendant that, upon her conviction of any of the offenses charged in Counts Three through Five, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offenses to forfeit: (a) any property constituting, or

derived from, any proceeds obtained directly or indirectly as the result of such offenses; and
(b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.

12. If any of the above-described forfeitable property, 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;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a) and 853(p))

A TRUE BILL

FOREPERSON

[REDACTED]

BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

ARIANA CHARLES,
also known as "A" and
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Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 371, 924(d)(1), 933(a)(1), 933(a)(2), 933(b),
934(a)(1), 2 and 3551 et seq.; T. 21, U.S.C., §§ 841(a)(1), 841(b)(1)(C),
846, 853(a) and 853(p); T. 28, U.S.C., § 2461(c))

A true bill.

Foreperson

Filed in open court this _____ *day,*

of _____ *A.D. 20* _____

Clerk

Bail, \$ _____

Adam Amir, Irisa Chen and James Simmons
Assistant U.S. Attorneys (718) 254-7000