

~~SEALED~~

*1/22/21  
KJR*

REDACTED

20

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,

v.

JAMAR JACKSON, a/k/a "Jay";  
DENISE BROWN, a/k/a "China";  
HARLEY DOUGLAS; and  
NICOLE JACKSON,

Defendants.

:  
: Criminal Action No. 20-CR-84  
:  
: Filed Under Seal

FILED  
DEC 10 2020  
US DISTRICT COURT  
DISTRICT OF DELAWARE

INDICTMENT

The Grand Jury for the District of Delaware charges that:

COUNT ONE

From on or about March 18, 2020, through on or about September 23, 2020, in the District of Delaware and elsewhere, the defendants,

**JAMAR JACKSON, a/k/a "Jay"; DENISE BROWN, a/k/a "China"; HARLEY DOUGLAS; and NICOLE JACKSON,**

knowingly and intentionally combined, conspired, confederated and agreed with each other and with other persons known and unknown to the Grand Jury to distribute a controlled substance, to wit: heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, all in violation of Title 21 United States Code, Sections 841(a)(1) and 846.

With respect to **JAMAR JACKSON** and **DENISE BROWN**, the amount involved in the conspiracy attributable to each defendant as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is one (1) kilogram of heroin, a Schedule I controlled

substance; and 400 grams or more of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

With respect to **HARLEY DOUGLAS** and **NICOLE JACKSON**, the amount involved in the conspiracy attributable to each defendant as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance; and a mixture and substance containing a detectable amount of fentanyl, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

All in violation of Title 21, United States Code, Section 846.

**COUNT TWO**

On or about September 23, 2020, in the District of Delaware, **HARLEY DOUGLAS**, defendant herein, knowingly possessed a firearm, that is a Noveske model N4 5.56 rifle, that had been shipped and transported in interstate commerce, from which the manufacturer's serial number had been removed, altered, and obliterated.

In violation of Title 18, United States Code, Sections 922(k) and 924(a)(1)(B).

**COUNT THREE**

On or about September 23, 2020, in the District of Delaware, the defendant, **HARLEY DOUGLAS**, did knowingly possess a firearm, to wit, a silver and black Smith & Wesson SD40 Handgun bearing serial number FZT9860, in furtherance of a drug trafficking crime, that is, Conspiracy to Distribute Heroin and Fentanyl, as alleged in Count One of this Indictment.

In violation of Title 18, United States Code, Section 924(c)(1)(A).

**NOTICE OF FORFEITURE FOR COUNT ONE**

Upon conviction of Count One, as alleged in this Indictment, **JAMAR JACKSON, a/k/a "Jay"; DENISE BROWN, a/k/a "China"; HARLEY DOUGLAS; and NICOLE JACKSON,**

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting or derived from proceeds obtained, directly or indirectly, as a result of said violation, and any property used, or intended to be used, in any manner or part to commit, or to facilitate the commission of, said violation, including but not limited to: (1) \$168,193.00; (2) a Noveske Model N4 5.56 rifle (obliterated serial number); (3) a Taurus Revolver (SN#MW611813); (4) a Smith & Wesson SD40 (SN#FZT9860); (5) a Taurus 9mm handgun (SN#TZA79412), (6) Mossberg shotgun (SN#R973606); (7) all firearms accessories, including but not limited to extended magazines; and (8) all ammunition.

If any of the 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;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

**NOTICE OF FORFEITURE FOR COUNTS TWO AND THREE**

Upon conviction of Count Two, as alleged in this Indictment, defendant **HARLEY DOUGLAS** shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any and all firearms involved in the commission of the offense, including but not limited to: (1) a Noveske Model N4 5.56 rifle (obliterated serial number); (2) all firearms accessories, including but not limited to extended magazines; and (3) all ammunition.

Upon conviction of Count Three, as alleged in this Indictment, defendant **HARLEY DOUGLAS** shall forfeit to the United States, Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any and all firearms involved in the commission of the offense, including but not limited to: (1) a Smith & Wesson SD40 Handgun (SN#FZT9860); (2) all firearms accessories, including but not limited to extended magazines; and (3) all ammunition.

If any of the 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;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

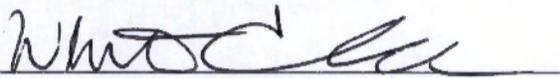
////

All in accordance with Title 18, United States Code, Section 924(d), Title 21, United States Code, Section 2461(c), and Rule 32.2(a), Federal Rules of Criminal Procedure.

A TRUE BILL

\_\_\_\_\_  
FOREPERSON

DAVID C. WEISS  
UNITED STATES ATTORNEY



By: Christopher L. de Barrena-Sarobe  
Whitney C. Cloud  
Assistant United States Attorneys

Dated: December 10, 2020