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EASTERN DISTRICT OF CALIFORNIA

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IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
Plaintiff,

v.

DEJOHN WILEY,  
AKA "PUG;"  
CHRIS WILEY,  
AKA "TROUBLE;"  
JAMAR JOHNSON,  
AKA "MAR MAR;"  
ANTHONY LATIMORE,  
AKA "ANT;"  
CHARLIE STEVENSON,  
AKA "C-BO;"  
GARRY SAMPSON;  
VONSHAY ROBINSON;  
AKA "V-SHAY;"  
RASHAWN ALKOBADI;  
AKA "NEMO;" and  
FEDERICO GARCIA;

Defendants.

CASE NO. **1:16 CR 00176 DAD BAM**

VIOLATIONS: 18 U.S.C. §§ 371, 922(a)(1)(A) – Conspiracy to Engage in the Business of Dealing Firearms Without a License; 18 U.S.C. § 922(a)(1)(A)-Engaging in the Business of Dealing Firearms Without a License; 18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm; 26 U.S.C. § 5861(d) – Possession of an Unregistered Firearms; 18 U.S.C. § 922(q)(2)(A) – Possession of a Firearm in a School Zone; 21 U.S.C. § 841(a)(1) – Distribution of Methamphetamine; 18 U.S.C. § 924(d)(1), 21 U.S.C. § 853(a), 26 U.S.C. § 5872, 28 U.S.C. § 2461(c), 49 U.S.C. § 80303-Criminal Forfeiture

INDICTMENT

COUNT ONE: [18 U.S.C. §§ 371, 922(a)(1)(A) – Conspiracy to Engage in the Business of Dealing Firearms Without a License]

The Grand Jury charges: T H A T

1  
2 DEJOHN WILEY,  
3 AKA "PUG;"  
4 CHRIS WILEY,  
5 AKA "TROUBLE;"  
6 JAMAR JOHNSON,  
7 AKA "MAR MAR;"  
8 ANTHONY LATIMORE,  
9 AKA "ANT;"  
10 CHARLIE STEVENSON,  
11 AKA "C-BO;"  
12 GARRY SAMPSON;  
13 FEDERICO GARCIA;  
14 VONSHAY ROBINSON,  
15 AKA "V-SHAY;" and  
16 RASHAWN ALKOBADI,  
17 AKA "NEMO;"  
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defendants herein, beginning on a date no later than November 23, 2015 and continuing until October 27, 2016, in the County of Fresno, State and Eastern District of California, did knowingly conspire and agree with each other, and with other persons known and unknown to the Grand Jury, to commit the following offenses against the United States:

- (a) to unlawfully and willfully engage in the business of dealing firearms without a license, in a violation of Title 18, United States Code, Section 922(a)(1)(A)

MANNER AND MEANS OF THE CONSPIRACY

1. It was a part of the conspiracy that Jamar JOHNSON, Charlie STEVENSON, Garry SAMPSON, Vonshay ROBINSON, and others known and unknown to the Grand Jury sold firearms to Dejohn WILEY, Chris WILEY, Rashawn ALKOBADI, and Anthony LATIMORE for further resale to others.

2. It was further a part of the conspiracy that Dejohn WILEY, Chris WILEY, Rashawn ALKOBADI, and Anthony LATIMORE obtained firearms from other co-defendants for further resale, and resold firearms to others.

3. At all times in the conspiracy, the defendants knew the firearms were to be resold to other buyers.

4. None of the listed defendants were licensed to engage in the business of dealing firearms by the Bureau of Alcohol, Tobacco, Firearms and Explosives.

1 OVERT ACTS

2 5. In furtherance of the conspiracy and to effect the objects of the conspiracy, the following  
3 overt acts, among others, were committed in the Eastern District of California and elsewhere:

4 **November 23, 2015**

- 5 (a) On or about November 23, 2015, A. LATIMORE introduced a buyer to D.  
6 WILEY during the sale to the buyer of two firearms (a S&W, Model M&P40, 40  
7 caliber pistol and a Glock, Model 30, 45 caliber pistol).  
8 (b) During the transaction, A. Latimore and D. WILEY discussed that they can  
9 acquire additional firearms for the buyer.

10 **December 21, 2015**

- 11 (c) On or about December 21, 2015, D. WILEY introduced a buyer to J. JOHNSON  
12 during the sale to the buyer of six firearms (a Sacramento Black Rifle, Model  
13 SBR-15, 5.56 caliber rifle; a Ruger, Model SR45, 45 caliber pistol; a Norinco,  
14 Model SKS, 7.62 caliber rifle; a HiPoint, Model CF380, 380 caliber pistol; a  
15 Taurus, Model PT100AF, 40 caliber pistol; and a Bersa, Model BP9CC, 9mm  
16 caliber pistol) and 93 grams of methamphetamine.  
17 (d) The Bersa firearm sold to the buyer was supplied by J. JOHNSON.

18 **January 5, 2016**

- 19 (e) On or about January 5, 2016, D. WILEY introduced a buyer to R. ALKOBADI  
20 during the sale to the buyer of four firearms (a Walther, Model PPX, 40 caliber  
21 pistol; a DPMS, Inc., Model A15, .223 caliber rifle; a Norinco, Model SKS,  
22 7.62x39 mm caliber rifle; and an IMI, Model UZI B, 9mm caliber rifle).  
23 (f) The IMI firearm sold to the buyer was supplied by R. ALKOBADI.

24 **February 29, 2016**

- 25 (g) On or about February 29, 2016, D. WILEY and C. WILEY sold two firearms (a  
26 Ruger, Model P94 Stainless, 9mm caliber pistol and a Glock, Model 22, 40  
27 caliber pistol) and 538 grams of methamphetamine to 4 buyers.  
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**March 7, 2016**

- (h) On or about March 7, 2016, R. ALKOBADI and F. GARCIA sold three firearms (an Intratec, Model Tec22, .22 LR caliber pistol; an Unknown Make/Model, 5.56 caliber AR-15; and a Star, Model Super, 9mm caliber pistol) to 4 buyers.
- (i) During the transaction, R. Alkobadi told the buyers that he and F. Garcia were making approximately \$100-\$150 each on the firearm deal.

**March 25, 2016**

- (j) On or about March 25, 2016, C. Wiley, V. Robinson, and another individual sold three firearms (a Ruger, P85MKII, 9mm caliber pistol; a S & W, M&P 15-22, .22 caliber rifle; and a Taurus, PT111G2, 9mm caliber pistol) to 2 buyers.
- (k) During the transaction, C. Wiley asked V. Robinson if he was willing to accept \$1,000.00 for the S & W firearm. V. Robinson agreed to sell the firearm for that price.

**September 27, 2016**

- (l) On or about September 27, 2016, A. Latimore sold one firearm (a Windham Weaponry Inc, Model WW-CF, 5.56x45mm caliber rifle) to a buyer. Prior to the transaction, C. Stevenson instructed A. Latimore on the price at which the firearm would be sold to the buyer.

**September 28, 2016**

- (m) On or about September 28, 2016, A. Latimore sold one firearm (an Ambush Tactical, Inc., Model AM-TAC, 5.56x45mm caliber rifle) to a buyer.
- (n) In connection with the transaction, A. Latimore asked C. Stevenson if he had any firearms for sale. C. Stevenson told A. Latimore that he had a Glock, Model 27 pistol and told A. Latimore to find out how much he could sell it for.
- (o) In communications between A. Latimore and unindicted coconspirator A, A. Latimore asked if he could get a firearm from unindicted coconspirator B to keep for himself.

1 (p) Unindicted coconspirator A told A. Latimore that he could pick it up whenever he  
2 wanted to.

3 **October 5 and 14, 2016**

4 (q) On or about October 5, 2016, unindicted coconspirator A sold A. Latimore an  
5 Atak Arms, Zoraki 925, 9mm, automatic pistol (NFA firearm) which was  
6 ultimately purchased by a buyer.

7 (r) Prior to the transfer of the firearm, unindicted coconspirator A told A. Latimore  
8 on October 5, 2016 that he wanted \$1,700.00 for the firearm and that he would  
9 send unindicted coconspirator B to deliver the firearm to A. Latimore.

10 (s) Unindicted coconspirator B delivered the firearm to A. Latimore, who supplied  
11 \$900.00 to unindicted coconspirator B for the purchase of the firearm.

12 (t) A. Latimore contacted unindicted coconspirator A on October 5, 2016 to make  
13 arrangements to pay him the remainder of the money at a later date. A. Latimore  
14 then sold the firearm to the buyer on October 14, 2016.

15 (u) On or about October 14, 2016, A. Latimore sold four firearms (a Ruger, Model  
16 P90, 45 caliber pistol; a Ruger, Model P89DC, 9mm caliber pistol; an AA Arms,  
17 Inc., Model AP 9, 9mm caliber pistol; and an Atak Arms, Zoraki 925, 9mm,  
18 automatic pistol [NFA]) to a buyer.

19 (v) Prior to the transaction, C. Stevenson and D. Hatcher discussed the anticipated  
20 transaction, and D. Hatcher indicated to C. Stevenson that he wanted to be  
21 involved in the transaction of the firearms.

22 (w) D. Hatcher then met with A. Latimore to provide transportation for A. Latimore to  
23 attempt to obtain methamphetamine for the buyer to purchase.

24 (x) After attempting to obtain methamphetamine, D. Hatcher drove A. Latimore to C.  
25 Stevenson's house and remained there during the firearm transaction with the  
26 buyer.

27 (y) C. Stevenson and G. Sampson discussed G. Sampson delivering firearms for C.  
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Stevenson to sell to the buyer.

(z) G. Sampson delivered the firearms to C. Stevenson's residence.

(aa) Approximately 40 minutes later, the buyer arrived at C. Stevenson's residence and purchased the aforementioned firearms from A. Latimore.

COUNTS 2 - 4: [18 U.S.C. § 922(a)(1)(A) – Engaging in the Business of Dealing Firearms Without a License ]

defendants herein as listed below, on or about the dates listed below, in the County of Fresno, State and Eastern District of California, not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

COUNT	DEFENDANT(s)	DATE
2	Dejohn Wiley	11/23/15 – 10/27/16
3	Anthony Latimore	11/23/15 – 10/27/16
4	Rashawn Alkobadi	1/5/16 – 10/27/16

COUNTS 5 - 18: [18 U.S.C. §922(g) (1) – Felon in Possession of a Firearm]

The Grand Jury further charges: T H A T

DEJOHN WILEY,  
AKA, "PUG,"

defendant herein, on or about the dates listed below, in the County of Fresno, State and Eastern District of California, having been convicted of a crime punishable by more than a year imprisonment, to wit:

an April 28, 2016 Fresno County Superior Court felony conviction for a violation of California Penal Code, Section 29800(a)(1), Felon in Possession of a Firearm (F14900182)

did knowingly and intentionally possess a firearm, to wit, the firearms set forth below, which had been shipped and transported in interstate and foreign commerce:

COUNT	DATE	FIREARM(S)
5	November 23, 2015	Smith & Wesson, Model M&P40, 40 caliber pistol
6	December 4, 2015	Taurus, Model PT92AF, 9mm caliber pistol
7	December 21, 2015	Ruger, Model SR45, 45 caliber pistol and, Taurus Model PT100AF40, 40 caliber pistol
8	January 5, 2016	DPMS, Model A15, 223 caliber rifle
9	January 8, 2016	SWD, Model M11, 9mm caliber pistol
10	January 21, 2016	Arms Corp of the Philippines, Model M1911-A1CS, 45 caliber pistol
11	February 10, 2016	Glock, Model 27, 40 caliber pistol and Beretta, Model 92FS, 9mm caliber pistol
12	February 29, 2016	Ruger, Model P94 Stainless, 9mm caliber pistol
13	April 15, 2016	Glock, Model 23, 40 caliber pistol
14	April 26, 2016	Hipoint, Model JHP, 45 caliber pistol
15	June 2, 2016	HS Produkt, Model XD40, 40 caliber pistol
16	June 21, 2016	Ruger, Model, P89, 9mm caliber pistol
17	July 15, 2016	Glock, Model 27, 40 caliber automatic pistol
18	July 25, 2016	Anschutz, Model Unknown, 22 caliber rifle, Remington, Model 514, 22 caliber rifle, and Universal Firearms, Model M1, 30 Carbine caliber rifle

All in violation of Title 18, United States Code, Sections 922(g)(1).

**COUNT 19:** [18 U.S.C. §922(g) (1) – Felon in Possession of a Firearm]

The Grand Jury further charges: T H A T

CHRIS WILEY,  
AKA, "TROUBLE,"

defendant herein, on or about March 25, 2016, in the County of Fresno, State and Eastern District of California, having been convicted of a crime punishable by more than a year imprisonment, to wit:

a April 12, 2013 Fresno County Superior Court felony conviction for a violation of California Penal Code, Section 460(a), Burglary (F12909419)

did knowingly and intentionally possess a firearm, to wit, a Ruger, Model P85MKII; 9mm caliber pistol and a Smith & Wesson, Model M&P 15-22, .22 caliber rifle, which had been shipped and transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 922(g)(1).

**COUNTS 20-23:** [18 U.S.C. §922(g) (1) – Felon in Possession of a Firearm]

The Grand Jury further charges: T H A T

ANTHONY LATIMORE,  
AKA, "ANT,"

defendant herein, on or about the dates listed below, in the County of Fresno, State and Eastern District of California, having been convicted of a crime punishable by more than a year imprisonment, to wit:

a May, 28, 2016, Fresno County Superior Court felony conviction for a violation of California Penal Code, Section 273.5, Inflict Corporal Injury on Spouse or Cohabitant (F14903717)

did knowingly and intentionally possess a firearm, to wit, the firearms set forth below, which had been shipped and transported in interstate and foreign commerce:

COUNT	DATE	FIREARM(S)
20	November 23, 2015	Glock, Model M&P40, 40 caliber pistol
21	September 27, 2016	Windham Weaponry Inc., Model WW-CF, 5.56 caliber rifle
22	September 28, 2016	Ambush Tactical Inc., Model AM-TAC, 5.56 caliber rifle
23	October 14, 2016	Ruger, Model P89DC, 9mm caliber pistol; Ruger, Model P90, 45 caliber pistol, and an AA Arms Inc., Model AP9, 9mm caliber pistol

All in violation of Title 18, United States Code, Sections 922(g)(1).

COUNTS 24-25: [18 U.S.C. §922(g) (1) – Felon in Possession of a Firearm]

The Grand Jury further charges: T H A T

JAMAR JOHNSON,  
AKA, "MAR MAR,"

defendant herein, on or about the dates set forth below, in the County of Fresno, State and Eastern District of California, having been convicted of a crime punishable by more than a year imprisonment, to wit:

a 2015 Fresno County Superior Court felony conviction for a violation of California Penal Code, Section 25400(a)(1), carrying a concealed weapon (F14906511)

did knowingly and intentionally possess a firearm, to wit, the firearms set forth below, which had been shipped and transported in interstate and foreign commerce:

COUNT	DATE	FIREARM(S)
24	December 21, 2015	Bersa, Model BP9CC 9mm pistol
25	October 14-15, 2016	Smith and Wesson, Model SW40VE .40 caliber pistol

All in violation of Title 18, United States Code, Sections 922(g)(1).

COUNTS 26-28: [18 U.S.C. §922(g) (1) – Felon in Possession of a Firearm]

The Grand Jury further charges: T H A T



CHARLIE STEVENSON,  
AKA, "C-Bo"

defendant herein, on or about October 14, 2016, in the County of Fresno, State and Eastern District of California, having been convicted of a crime punishable by more than a year imprisonment, to wit:

a 2009 Fresno County Superior Court felony conviction for a violation of California Penal Code, Section 12031 (A)(1), Carry a Loaded Firearm in Public (F09904677);

a December 12, 2011 Fresno County Superior Court felony conviction for a violation of California Vehicle Code, Section 2800.2 (A), Evading a Peace Officer, Disregard Safety (F11902061);

a December 12, 2011 Fresno County Superior Court felony conviction for a violation of California Vehicle Code, Section 10851 (A), Taking a Motor Vehicle Without Owner Consent (F11902061)

did knowingly and intentionally possess a firearm, to wit, the firearms set forth below, which had been shipped and transported in interstate and foreign commerce:

COUNT	DATE	FIREARM(S)
26	September 27, 2016	Windham Weaponry Inc., Model WW-CF, 5.56 caliber rifle
27	September 28, 2016	Ambush Tactical Inc., Model AM-TAC, 5.56 caliber rifle
28	October 14, 2016	Ruger, Model P89DC, 9mm caliber pistol; Ruger, Model P90, 45 caliber pistol, and an AA Arms Inc., Model AP9, 9mm caliber pistol

All in violation of Title 18, United States Code, Sections 922(g)(1).

COUNT 29: [18 U.S.C. §922(g) (1) – Felon in Possession of a Firearm]

The Grand Jury further charges: T H A T

GARRY SAMPSON,  
AKA, "G-Dog,"

defendant herein, on or about October 14, 2016, in the County of Fresno, State and Eastern District of California, having been convicted of a crime punishable by more than a year imprisonment, to wit:

a February 23, 1998, Fresno County Superior Court felony conviction for a violation of California Penal Code, Section 496(A), Receiving Known Stolen Property (F97916241-3);

a November 7, 2005, Fresno County Superior Court felony conviction for a violation of California Health and Safety Code, Section 11351.5, Possession of Controlled Substance while Armed (F05906835-9);

a November 7, 2005, Fresno County Superior Court felony conviction for a violation of California Penal Code, Section 12021(A)(1), Felon in Possession of a Firearm

1 (F04907522-7);

2 a 2012 Felony Conviction for Possession of a Firearm after suffering a conviction for a  
3 misdemeanor domestic violence conviction in violation of Title 18, USC Section  
4 922(g)(9).

5 did knowingly and intentionally possess a firearm, to wit, a Ruger, Model P89DC, 9mm caliber pistol; a  
6 Ruger, Model P90, 45 caliber pistol, and an AA Arms Inc., Model AP9, 9mm caliber pistol, which had  
7 been shipped and transported in interstate and foreign commerce.

8 All in violation of Title 18, United States Code, Sections 922(g)(1).

9 COUNT 30: [26 U.S.C. § 5861(d) – Possession of an Unregistered Firearm]

10 The Grand Jury further charges: T H A T

11 DEJOHN WILEY,  
12 AKA, “Pug,”

13 defendant herein, on or about June 2, 2016, in the County of Fresno, State and Eastern District of  
14 California, did knowingly possess a firearm, as defined in Title 26, United States Code, Section 5845, to  
15 wit, an unknown make/model, AR-15 short barreled rifle, which was not registered to him in the  
16 National Firearm Registration and Transfer Record.

17 All in violation of Title 26, United States Code, Section § 5861(d).

18 COUNT 31: [26 U.S.C. § 5861(d) – Possession of an Unregistered Firearm]

19 The Grand Jury charges: T H A T

20 DEJOHN WILEY,  
21 AKA, “Pug,”

22 defendant herein, on or about July 15, 2016, in the County of Fresno, State and Eastern District of  
23 California, did knowingly possess a firearm, as defined in Title 26, United States Code, Section 5845, to  
24 wit, a Glock, Model 27, 40 caliber automatic handgun, which was not registered to him in the National  
25 Firearm Registration and Transfer Record.

26 All in violation of Title 26, United States Code, Section § 5861(d).

27 COUNT 32: [26 U.S.C. § 5861(d) – Possession of an Unregistered Firearm]

28 The Grand Jury charges: T H A T

1 ANTHONY LATIMORE,  
2 AKA "ANT;" and  
3 CHARLIE STEVENSON,  
4 AKA "C-BO"

5 defendants herein, on or about October 14, 2016, in the County of Fresno, State and Eastern District of  
6 California, did knowingly possess a firearm, as defined in Title 26, United States Code, Section 5845, to  
7 wit, an Atak Arms, Zoraki 925, 9mm, automatic converted blank pistol, which was not registered to him  
8 in the National Firearm Registration and Transfer Record.

9 All in violation of Title 26, United States Code, Section § 5861(d).

10 COUNTS 33-43: [18 U.S.C. §922(q)(2)(A) – Possession of a Firearm in a School Zone]

11 The Grand Jury further charges: T H A T  
12 defendants as listed below, on the dates listed, in the County of Fresno, State and Eastern District of  
13 California, did knowingly possess the firearms listed below, that had moved in interstate and foreign  
14 commerce, within a distance of 1,000 feet of the grounds of Franklin Elementary School, a place that the  
15 defendant knew and had reasonable cause to believe was a school zone.

COUNT	DATE	DEFENDANT(S)	FIREARM(S)
33	January 5, 2016	Dejohn WILEY	DPMS, Model A15, 223 caliber rifle
34	January 5, 2016	Rashawn ALKOBADI	IMI, Model Uzi B, 9mm caliber pistol
35	January 8, 2016	Dejohn WILEY	SWD, Model M11, 9mm caliber pistol
36	January 8, 2016	Rashawn ALKOBADI	Intratec, Model Tec 9, 9mm caliber pistol
37	January 21, 2016	Dejohn WILEY	Arms Corp of the Philippines, Model M1911-A1CS, 45 caliber pistol
38	January 21, 2016	Rashawn ALKOBADI	Ruger, New Model Vaquero, 357 caliber revolver
39	February 10, 2016	Dejohn WILEY	Glock, Model 27, 40 caliber pistol, and a Beretta, Model 92FS, 9mm caliber pistol
40	February 10, 2016	Rashawn ALKOBADI	Glock, Model 30, 45 caliber pistol, an Arms Corp of the Philippines, Model M1911-A1CS, 45 caliber pistol,
41	March 7, 2016	Rashawn ALKOBADI Federico GARCIA	Star, Model Super, 9mm caliber pistol
42	March 25, 2016	Chris WILEY	a Ruger, P85MKII, 9mm caliber pistol, and a Smith & Wesson, Model M&P 15-22, 22 caliber rifle
43	March 25, 2016	Rashawn ALKOBADI	Ruger, Model 10/22, 22 caliber rifle,

All in violation of Title 18, United States Code, Sections 922(q)(2)(A) and 924(a)(4).

COUNTS 44- 56: [21 U.S.C. § 841(a)(1) – Distribution of Methamphetamine]

The Grand Jury further charges T H A T:

Defendants as noted in the table below, in the State and Eastern District of California, did knowingly and intentionally distribute a mixture containing a detectable amount of methamphetamine, a Schedule II controlled substance on the following dates with the further allegation of amount involved in the offense:

COUNT	DEFENDANT(s)	DATE	AMOUNT
44	Dejohn WILEY	December 4, 2015	Approximately 3 grams of a mixture containing a detectable amount of methamphetamine
45	Dejohn WILEY	December 21, 2015	50 grams and more of a mixture containing a detectable amount of methamphetamine
46	Dejohn WILEY	January 8, 2016	50 grams and more of a mixture containing a detectable amount of methamphetamine
47	Dejohn WILEY	January 21, 2016	50 grams and more of a mixture containing a detectable amount of methamphetamine
48	Rashawn ALKOBADI, Federico GARCIA	February 10, 2016	50 grams and more of a mixture containing a detectable amount of methamphetamine
49	Dejohn WILEY and Chris WILEY	February 29, 2016	500 grams and more of a mixture containing a detectable amount of methamphetamine and 50 grams and more of methamphetamine
50	Rashawn ALKOBADI and Federico GARCIA	March 7, 2016	50 grams and more of a mixture containing a detectable amount of methamphetamine
51	Chris WILEY	March 25, 2016	50 grams and more of a mixture containing a detectable amount of methamphetamine
52	Dejohn WILEY	April 15, 2016	50 grams and more of a mixture containing a detectable amount of methamphetamine
53	Dejohn WILEY	April 26, 2016	50 grams and more of a mixture containing a detectable amount of methamphetamine
54	Dejohn WILEY	June 2, 2016	50 grams and more of a mixture containing a detectable amount of methamphetamine
55	Dejohn WILEY	July 15, 2016	50 grams and more of a mixture containing a detectable amount of methamphetamine
56	Anthony LATIMORE	October 21, 2016	50 grams and more of a mixture containing a detectable amount of methamphetamine

All in violation of Title 21, United States Code, Section 841(a)(1).

**FORFEITURE ALLEGATION:** [18 U.S.C. § 924(d)(1), 21 U.S.C. § 853(a), 26 U.S.C. § 5872, 28 U.S.C. § 2461(c), 49 U.S.C. § 80303 – Criminal Forfeiture]

1. Upon conviction of one or more of the offenses alleged in Counts One through Thirty and Count Thirty-Four through Forty-Five of this Indictment, defendants DEJOHN WILEY, AKA "PUG," CHRIS WILEY, AKA "TROUBLE," JAMAR JOHNSON, AKA "MAR MAR," ANTHONY

1 LATIMORE, AKA "ANT," CHARLIE STEVENSON, AKA "C-BO," GARRY SAMPSON,  
2 FEDERICO GARCIA, VONSHAY ROBINSON, AKA "V-SHAY," and, RASHAWN ALKOBADI,  
3 AKA "NEMO," shall forfeit to the United States pursuant to Title 18, United States Code, Section  
4 924(d)(1) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in  
5 or used in the knowing commission of the offenses.

6 2. Upon conviction of one or more of the offenses alleged in Counts Thirty-One through  
7 Thirty-Three of this Indictment, defendants DEJOHN WILEY, AKA "PUG," ANTHONY LATIMORE,  
8 AKA "ANT," and, CHARLIE STEVENSON, AKA "C-BO," shall forfeit to the United States pursuant  
9 to Title 26, United States Code, Section 5872, Title 28, United States Code, Section 2461(c), and Title  
10 49, United States Code, Section 80303, any firearms involved in the commission of the offenses; any  
11 property used, or intended to be used in the commission of the offenses; and any aircraft, vehicle, or  
12 vessel involved in the commission of the offenses.

13 3. Upon conviction of one or more of the offenses alleged in Counts Forty-Six through  
14 Fifty-Eight of this Indictment, defendants DEJOHN WILEY, AKA "PUG," RASHAWN ALKOBADI,  
15 AKA "NEMO," FEDERICO GARCIA, CHRIS WILEY, AKA "TROUBLE," and CHARLIE  
16 STEVENSON, AKA "C-BO," shall forfeit to the United States pursuant to Title 21, United States  
17 Code, Section 853(a), the following property:

18 a. All right, title, and interest in any and all property involved in violations of Title  
19 21, United States Code, Section 841(a)(1), or conspiracy to commit such offenses, for which defendants  
20 are convicted, and all property traceable to such property, including the following: all real or personal  
21 property, which constitutes or is derived from proceeds obtained, directly or indirectly, as a result of  
22 such offenses; and all property used, or intended to be used, in any manner or part to commit or to  
23 facilitate the commission of the offenses.

24 b. A sum of money equal to the total amount of proceeds obtained as a result of the  
25 offenses, or conspiracy to commit such offenses, for which defendants are convicted.

26 a. A sum of money equal to the amount of proceeds traceable to such offense, for  
27 which defendant is convicted.  
28

1                   b.       5.       If any property subject to forfeiture, as a result of the offenses alleged in  
2 this Indictment, for which defendants are convicted:

- 3                   a.       cannot be located upon the exercise of due diligence;  
4                   b.       has been transferred or sold to, or deposited with, a third party;  
5                   c.       has been placed beyond the jurisdiction of the Court;  
6                   d.       has been substantially diminished in value; or  
7                   e.       has been commingled with other property which cannot be divided without  
8                               difficulty;

9 it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28,  
10 United States Code, Section 2461(c), to seek forfeiture of any other property of defendant, up to the  
11 value of the property subject to forfeiture.  
12

13  
14  
15 A TRUE BILL.

15 PHILLIP A. TALBERT  
16 Acting U.S. Attorney

17  
18   
19 FOREPERSON

18   
19 By KIRK E. SHERRIFF  
20 Assistant U.S. Attorney  
21 Chief of Fresno Office  
22  
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