

FILED
IN CLERK'S OFFICE
US DISTRICT COURT E.D.N.Y.
*** AUGUST 6, 2024 ***
BROOKLYN OFFICE

SK:ML
F. #2024R00182

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

KEVINDALE NURSE,

Defendant.
----- X

INDICTMENT

Cr. No. 24-CR-322
(T. 18, U.S.C., §§ 844(c)(1), 844(i),
982(a)(2), 982(b)(1), 2 and 3551 et seq.;
T. 21, U.S.C., § 853(p))

Judge Margo K. Brodie
Magistrate Judge Taryn A. Merkl

THE GRAND JURY CHARGES:

ARSON

1. On or about January 31, 2024, within the Eastern District of New York and elsewhere, the defendant KEVINDALE NURSE, together with others, did knowingly, intentionally and maliciously damage and destroy, and attempt to damage and destroy, by means of fire and an explosive, a vehicle and other personal and real property used in interstate and foreign commerce and in an activity affecting interstate and foreign commerce, to wit: a Verizon van, which resulted in personal injury to another person, to wit: one or more occupants within the Verizon van.

(Title 18, United States Code, Sections 844(i), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged herein, the government will seek forfeiture in accordance with: (a) Title 18, United States Code, Section 844(c)(1), which requires any person convicted of such offense to forfeit any explosive materials involved or used or intended to be used in any violation


property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 844(c)(1), 982(a)(2) and 982(b)(1); Title 21, United States Code, Section 853(p))

A TRUE BILL



FOREPERSON


BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK