

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 16 -
v.	:	DATE FILED: January 27, 2016
JOSE CHARRIEZ,	:	VIOLATIONS:
a/k/a "Jun"	:	21 U.S.C. § 841(a)(1) (possession of
	:	cocaine with intent to distribute - 1 count)
	:	18 U.S.C. § 924(c)(1) (possession of a
	:	firearm in furtherance of drug trafficking
	:	crime – 1 count)
	:	18 U.S.C. § 922(g) (possession of firearm
	:	by convicted felon – 1 count)
	:	Notices of Forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about March 18, 2015, at 539 Upland Street in Pottstown, in the Eastern District of Pennsylvania, defendant

**JOSE CHARRIEZ,
a/k/a "Jun,"**

knowingly and intentionally possessed with the intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1),(b)(1)(C).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 18, 2015, at 539 Upland Street in Pottstown, in the Eastern District of Pennsylvania, defendant

**JOSE CHARRIEZ,
a/k/a "Jun,"**

knowingly and intentionally possessed a firearm, that is, a loaded .45 caliber Glock semi-automatic pistol with an obliterated serial number, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, a violation of Title 21, United States Code, Section 841(a)(1).

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 18, 2015, at 539 Upland Street in Pottstown, in the Eastern District of Pennsylvania, defendant

**JOSE CHARRIEZ,
a/k/a "Jun,"**

having been convicted in a court of the Commonwealth of Pennsylvania, and in a federal district court, of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a .45 caliber Glock semi-automatic pistol with an obliterated serial number that was loaded with six Federal cartridges, caliber .45 automatic.

In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE NO. 1

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of violation of Title 21, United States Code, Section 841(a)(1), set forth in this indictment, defendant

**JOSE CHARRIEZ,
a/k/a "Jun,"**

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses, including, but not limited to:

(1) a .45 caliber Glock semi-automatic pistol with an obliterated serial number that was loaded with six Federal cartridges, caliber .45 automatic.

(b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses, including, but not limited to, the sum of \$7,800 seized from 539 Upland Street, Pottstown, Pennsylvania, on March 18, 2015.

2. If any of the property subject to forfeiture, 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 property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

NOTICE OF FORFEITURE NO. 2

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of violation of Title 18, United States Code, Section 922(g)(1), set forth in this indictment, defendant

**JOSE CHARRIEZ,
a/k/a "Jun,"**

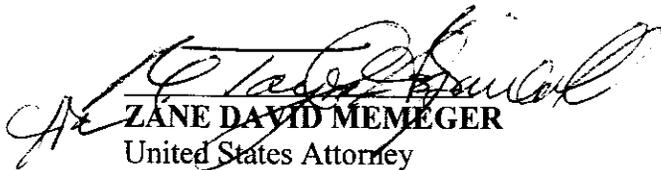
shall forfeit to the United States of America all firearms and ammunition involved in the commission of such violation, including but not limited to:

- (a) a .45 caliber Glock semi-automatic pistol with an obliterated serial number that was loaded with six Federal cartridges, caliber .45 automatic.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

A TRUE BILL:

FOREPERSON


ZANE DAVID MEMEGER
United States Attorney

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MMB

INDICTMENT

16-25

DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 615 Chestnut Street, Suite 1250, Philadelphia, PA 19106-4476

Post Office: Philadelphia

County: Philadelphia

City and State of Defendant: Pottstown, PA

County: Montgomery

Register number: N/A

Place of accident, incident, or transaction:

Eastern District of Pennsylvania

Post Office: Pottstown

County: Montgomery

RELATED CASE, IF ANY:

Criminal cases are deemed related when the answer to the following question is "yes".

Does this case involve a defendant or defendants alleged to have participated in the same action or transaction, or in the same series of acts or transactions, constituting an offense or offenses?

YES/NO: N

Case Number: N/A

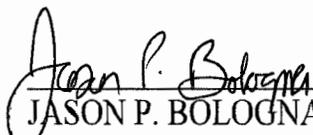
Judge: N/A

CRIMINAL: (Criminal Category - FOR USE BY U.S. ATTORNEY ONLY)

- 1. Antitrust
- 2. Income Tax and other Tax Prosecutions
- 3. Commercial Mail Fraud
- 4. Controlled Substances
- 5. Violations of 18 U.S.C. Chapters 95 and 96 (Sections 1951-55 and 1961-68) and Mail Fraud other than commercial
- 6. General Criminal

(U.S. ATTORNEY WILL PLEASE DESIGNATE PARTICULAR CRIME AND STATUTE CHARGED TO BE VIOLATED AND STATE ANY PREVIOUS CRIMINAL NUMBER FOR SPEEDY TRIAL ACT TRACKING PURPOSES) 21 U.S.C. § 841(a)(1) (possession of cocaine with intent to distribute - 1 count); 18 U.S.C. § 924(c)(1) possession of a firearm in furtherance of drug trafficking crime - 1 count); 18 U.S.C. § 922(g) (possession of firearm by convicted felon - 1 count); Notices of Forfeiture

DATE: 1/27/16


JASON P. BOLOGNA
Assistant United States Attorney

File No. 2016R00051
U.S. v. Jose Charriez