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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
ATHENS DIVISION

UNITED STATES OF AMERICA,	**CASE NO. 3:24-CR-23**
v.	**INDICTMENT**
SAM HOMLER, **SHAYAAN HUSAIN and** **SERGIO MARROQUIN-SOSA,**	**VIOLATIONS:**
Defendants.	**21 U.S.C. § 841(a)(1)** **21 U.S.C. § 841(b)(1)(C)** **21 U.S.C. § 846** **21 U.S.C. § 841(b)(1)(A)** **21 U.S.C. § 853**

THE GRAND JURY CHARGES:

COUNT ONE
(CONSPIRACY TO POSSESS WITH INTENT TO DISTRIBUTE PROTONITAZENE)

Beginning or about September 1, 2023, and continuing to on or about April 10, 2024, in the Athens Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

SAM HOMLER and SHAYAAN HUSAIN,

Defendants herein, did knowingly and intentionally combine, conspire, and agree together and with each other, and with other persons both known and unknown to the Grand Jury, to commit the following offenses against the United States: to possess with the intent to distribute a Schedule I controlled substance, to wit: protonitazene, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); all in violation of Title 21, United States Code, Section 846.

COUNT TWO
(CONSPIRACY TO POSSESS WITH INTENT TO DISTRIBUTE METHAMPHETAMINE)

Beginning or about September 1, 2023, and continuing to on or about April 10, 2024, in the Athens Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

SAM HOMLER and SERGIO MARROQUIN-SOSA,

Defendants herein, did knowingly and intentionally combine, conspire, and agree together and with each other, and with other persons both known and unknown to the Grand Jury, to commit the following offenses against the United States: to possess with the intent to distribute a Schedule II controlled substance, to wit: fifty (50) grams or more of methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A); all in violation of Title 21, United States Code, Section 846.

FORFEITURE NOTICE
(21 U.S.C. § 853 - Criminal Forfeiture)

1. The allegations contained in Counts One and Two of the Indictment are hereby re-alleged and incorporated by reference into this Notice for the purpose of alleging forfeiture to the United States of America, pursuant to the provisions of Title 21, United States Code, Section 853.

2. Upon conviction of an offense in violation of Title 21, United States Code, Section 846, in connection with Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) set forth in Count One; and/or Title 21, United States Code, Section 846, in connection with Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) set forth in Count Two of the Indictment, the Defendant(s),

SAM HOMLER,
SHAYAAN HUSAIN, and
SERGIO MARROQUIN-SOSA,

shall forfeit to the United States of America pursuant to Title 21, United States Code, Section 853,

any property constituting, or derived from, any proceeds obtained, directly and indirectly, as a result of such offense(s), and any property, real or personal, used, or intended to be used in any manner or part to commit, or to facilitate the commission of, the offense(s).

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

(a) cannot be located upon exercise of due diligence;

(b) has been transferred, sold to or deposited with, a third person;

(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 subdivided 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).

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

A TRUE BILL.

s/ Foreperson of the Grand Jury
FOREPERSON OF THE GRAND JURY

PRESENTED BY:

PETER D. LEARY
UNITED STATES ATTORNEY

DANIEL W.A. PEACH
ASSISTANT UNITED STATES ATTORNEY

Filed in ~~open~~ court this 9 day of July, 2024.

Deputy Clerk