Case 3:18-cr-00003-RV *SEALED* Document 42 Filed 03/22/18 Page 1 of 20

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF FLORIDA PENSACOLA DIVISION

UNITED STATES OF AMERICA

v.

SEALED SUPERSEDING <u>INDICTMENT</u> 3:18cr3/RV

UY NGUYEN AARON M. BOOKER JOSEPH F. BOOKER JR. and KAISHAWNDRA G. LYONS

THE GRAND JURY CHARGES:

COUNT ONE

Between on or about February 1, 2015, and on or about December 19, 2017,

in the Northern District of Florida and elsewhere, the defendants,

UY NGUYEN, AARON M. BOOKER, and JOSEPH F. BOOKER JR.,

did knowingly and willfully combine, conspire, confederate, and agree together and with other persons to distribute and possess with intent to distribute a controlled substance, and this offense involved 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine and 100 kilograms or

CERTIFIED A TRUE COPY
Jeseica J. Lyublanovits
By Lon Col
Deputy Clark

Returned in open court pursuant to Rule 6(f)
3-22-18
Date
Ungerta A Amolf
United States Magistrate Judge

more of a mixture and substance containing a detectable amount of marijuana, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(ii), and 841(b)(1)(B)(vii).

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

COUNT TWO

Between on or about February 1, 2015, and on or about December 19, 2017, in the Northern District of Florida and elsewhere, the defendants,

UY NGUYEN, AARON M. BOOKER, JOSEPH F. BOOKER JR., and KAISHAWNDRA G. LYONS,

L

did knowingly combine, conspire, confederate, and agree together and with other persons to conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, that is, the interstate transfer of monetary instruments in the form of United States currency, and the purchase of precious metals, stones, and jewels, involving funds that were proceeds of a specified unlawful activity, that is, conspiracy to distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Sections 841(a) and 846, and that the defendants knew to be the proceeds of some form of unlawful activity, with the intent to promote the carrying on of the specified unlawful activity, and knowing that these transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 1956(a)(1)(B)(i).

All in violation of Title 18, United States Code, Section 1956(h).

COUNT THREE

On or about November 1, 2016, in the Northern District of Florida, in a matter within the jurisdiction of the executive branch of the Government of the United States, that is, the Internal Revenue Service, the defendant,

KAISHAWNDRA G. LYONS,

did knowingly and willfully make materially false, fictitious, and fraudulent statements and representations, to wit, the defendant falsely stated that the United States currency she had deposited in out of state bank accounts was money she earned from doing hair and sewing, whereas, in truth and in fact and as the defendant well knew, the defendant had not legitimately earned the United States currency from doing hair and sewing.

In violation of Title 18, United States Code, Section 1001(a)(2).

CONTROLLED SUBSTANCE FORFEITURE

The allegations contained in Count One of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853. Case 3:18-cr-00003-RV *SEALED* Document 42 Filed 03/22/18 Page 4 of 20

From the defendants' engagement in the violation alleged in Count One, punishable by imprisonment for more than one year, the defendants,

UY NGUYEN, AARON M. BOOKER, and JOSEPH F. BOOKER JR.,

shall forfeit to the United States, pursuant to Title 21, United States Code, Sections 853(a)(1) and 853(a)(2), all of the defendants' interest in:

A. Property constituting or derived from any proceeds the defendants obtained directly or indirectly as the result of such violation.

B. Property used in any manner or part to commit or to facilitate the commission of such violation.

The property subject to forfeiture pursuant to Title 21, United States Code, Section 853, includes, but is not limited to, the following:

- U.S. currency totaling \$321,771 seized from AARON M. BOOKER on or about December 19, 2017;
- One Cobra .380 caliber firearm (SN CP019686) with 6 rounds of Fiocchi .380 caliber ammunition seized from AARON M. BOOKER on or about December 19, 2017;

- One silver necklace inscribed with "10K" with clear stones and pendant inscribed "MAN" seized from AARON M. BOOKER on or about December 19, 2017;
- One silver necklace inscribed with "10K" with clear stones and pendant inscribed "Check Chaser" seized from AARON M.
 BOOKER on or about December 19, 2017;
- One gold and silver Rolex watch with clear stones seized from AARON M. BOOKER on or about December 19, 2017;
- One silver pendant with clear stones inscribed "YCC" on the front and "Yung Check Casher" on the back seized from AARON M.
 BOOKER on or about December 19, 2017;
- One silver pendant with clear stones inscribed "YCC" on the front and "Yung Check Casher" on the back seized from AARON M.
 BOOKER on or about December 19, 2017;
- 8. One silver pendant with clear stones inscribed "Pyrex" in the shape of a measurement cup and inscribed "Avianni" on the back seized from

One silver Audemars Piguet watch with clear stones with "Royal Oak," "No 7813," and "136650" inscribed on the back seized from AARON M. BOOKER on or about December 19, 2017;

- One silver necklace inscribed with "10K" with pendant with clear stones inscribed "ARM & HAMMER," "THE STANDARD OF PURITY" on the front and "YCC," "MOB," and "ICE BOX" on the back seized from AARON M. BOOKER on or about December 19, 2017;
- One silver ring with clear stones inscribed with "14K" seized from AARON M. BOOKER on or about December 19, 2017;
- One rose ring with clear stones inscribed with "ICE BOX" and "18K
 B.2.64 CTW" seized from AARON M. BOOKER on or about
 December 19, 2017;
- One silver necklace inscribed with "10K" with clear stones and pendant with clear stones inscribed "YCC" on the front and "Yung Check Casher" on the back seized from AARON M. BOOKER on or about December 19, 2017;
- One silver necklace inscribed with "10K" with clear stones and pendant with clear stones in the shape of a diamond seized from AARON M. BOOKER on or about December 19, 2017;
- One silver watch link with clear stones seized from AARON M.
 BOOKER on or about December 19, 2017;

- One Gucci bag (SN 337111585795) seized from AARON M.
 BOOKER on or about December 19, 2017;
- 17. One pair of Gucci sunglasses (Model #GG0159S) seized from

- One pair of white Christian Louboutin red bottom high-top shoes seized from AARON M. BOOKER on or about December 19, 2017;
- One pair of blue Christian Louboutin red bottom high-top shoes
 seized from AARON M. BOOKER on or about December 19, 2017;
- One pair of red Christian Louboutin red bottom high-top shoes seized from AARON M. BOOKER on or about December 19, 2017;
- One pair of multi-color Christian Louboutin red bottom high-top shoes seized from AARON M. BOOKER on or about December 19, 2017;
- One pair of black Gucci shoes with flames seized from AARON M.
 BOOKER on or about December 19, 2017;
- One pair of white Gucci high-top shoes with tiger seized from
 AARON M. BOOKER on or about December 19, 2017;
- One pair of black Gucci high-top shoes with tiger seized from
 AARON M. BOOKER on or about December 19, 2017;

- One pair of green Gucci high-top shoes seized from AARON M.
 BOOKER on or about December 19, 2017;
- 26. One multi-color wool Gucci child's dress (Model #478581X9D42-3311-8) seized from AARON M. BOOKER on or about December 19, 2017;
- 27. One pair of multi-color Gucci child's slippers (Model #5038939KY20-8972-33) seized from AARON M. BOOKER on or about December 19, 2017;
- 28. One pair of white Gucci baby shoes (Model #455447CPWP0-9085-20) seized from AARON M. BOOKER on or about December 19, 2017;
- 29. One orange Gucci child's sweatshirt (Model #478371X9A92-7049-18/24) seized from AARON M. BOOKER on or about December 19, 2017;
- One red Gucci child's sweatshirt (Model #497819X9P52-6148-18/24)
 seized from AARON M. BOOKER on or about December 19, 2017;
- One red Gucci child's hat (Model #4594314K638-6500-M) seized from AARON M. BOOKER on or about December 19, 2017;

- 32. One pair of Gucci child's ballerina shoes (Model #418997KLQ80-4081-23) seized from AARON M. BOOKER on or about December 19, 2017;
- One pair of blue Balenciaga high-top shoes seized from AARON M.
 BOOKER on or about December 19, 2017;
- One red Salvatore Ferragamo belt (Model #SP-67 9163) seized from AARON M. BOOKER on or about December 19, 2017;
- One pair of red Buscemi high-top shoes seized from AARON M.
 BOOKER on or about December 19, 2017;
- 36. One pair of white Gucci shoes with GG print seized from AARONM. BOOKER on or about December 19, 2017;
- 37. One pair of white Gucci shoes embroidered with "BLIND FOR
 LOVE" seized from AARON M. BOOKER on or about December
 19, 2017;
- One pair of silver Gucci shoes with dragon seized from AARON M.
 BOOKER on or about December 19, 2017;
- One pair of multi-color Gucci shoes with tiger pattern seized from
 AARON M. BOOKER on or about December 19, 2017;
- One pair of Pierre Balmain jeans seized from AARON M. BOOKER on or about December 19, 2017;

- One blue Gucci cardigan with tiger print seized from AARON M.
 BOOKER on or about December 19, 2017;
- One multi-color Versace shirt with logo seized from AARON M.
 BOOKER on or about December 19, 2017;
- 43. One black Moncler maya jacket (Model #C2-091-4036605-68950-999) seized from AARON M. BOOKER on or about December 19, 2017;
- 44. One pair of white Balenciaga shoes (Model #483546-W06F1-9000)seized from AARON M. BOOKER on or about December 19, 2017;
- One pair of red Balenciaga shoes (Model #412345-WAX30-6500)
 seized from AARON M. BOOKER on or about December 19, 2017;
- One pair of black and white Christian Louboutin red bottom high-top shoes seized from AARON M. BOOKER on or about December 19, 2017;
- One black Louis Vuitton bag seized from AARON M. BOOKER on or about December 19, 2017;
- One pair of multi-color Gucci shoes with floral print seized from AARON M. BOOKER on or about December 19, 2017;
- 49. One pair of pastel blue Maison Margiela high-top shoes seized from

- One pair of black Saint Laurent shoes seized from AARON M.
 BOOKER on or about December 19, 2017;
- One Apple iPhone X (SN 1514617511) seized from AARON M.
 BOOKER on or about December 19, 2017;
- 52. One KCI AR-15 100 round magazine with 83 rounds of PMC .223 Remington ammunition seized from UY NGUYEN on or about December 19, 2017; and
- U.S. currency totaling \$16,870 seized by the United States Postal Inspection Service on or about December 5, 2017.

If any of the property subject to forfeiture as a result of any act or omission of the defendants:

- i. cannot be located upon the exercise of due diligence;
- has been transferred or sold to, or deposited with, a third person;
- iii. has been placed beyond the jurisdiction of this Court;
- iv. has been substantially diminished in value; or
- v. has been commingled with other property that 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 said defendants up to the value of the above forfeitable property.

MONEY LAUNDERING FORFEITURE

The allegations contained in Count Two of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(1). From the defendants' engagement in the violation alleged in Count Two of this Indictment, the defendants,

UY NGUYEN, AARON M. BOOKER, JOSEPH F. BOOKER JR., and KAISHAWNDRA G. LYONS,

shall forfeit to the United States of America any and all of the defendants' right, title, and interest in any property, real and personal, involved in such offense, and any property traceable to such property.

The property subject to forfeiture includes, but is not limited to, the following:

 U.S. currency totaling \$321,771 seized from AARON M. BOOKER on or about December 19, 2017;

- One Cobra .380 caliber firearm (SN CP019686) with 6 rounds of Fiocchi .380 caliber ammunition seized from AARON M. BOOKER on or about December 19, 2017;
- One silver necklace inscribed with "10K" with clear stones and pendant inscribed "MAN" seized from AARON M. BOOKER on or about December 19, 2017;
- One silver necklace inscribed with "10K" with clear stones and pendant inscribed "Check Chaser" seized from AARON M.
 BOOKER on or about December 19, 2017;
- One gold and silver Rolex watch with clear stones seized from AARON M. BOOKER on or about December 19, 2017;
- One silver pendant with clear stones inscribed "YCC" on the front and "Yung Check Casher" on the back seized from AARON M.
 BOOKER on or about December 19, 2017;
- One silver pendant with clear stones inscribed "YCC" on the front and "Yung Check Casher" on the back seized from AARON M.

BOOKER on or about December 19, 2017;

 One silver pendant with clear stones inscribed "Pyrex" in the shape of a measurement cup and inscribed "Avianni" on the back seized from AARON M. BOOKER on or about December 19, 2017;

- One silver Audemars Piguet watch with clear stones with "Royal Oak," "No 7813," and "136650" inscribed on the back seized from AARON M. BOOKER on or about December 19, 2017;
- One silver necklace inscribed with "10K" with pendant with clear stones inscribed "ARM & HAMMER," "THE STANDARD OF PURITY" on the front and "YCC," "MOB," and "ICE BOX" on the back seized from AARON M. BOOKER on or about December 19, 2017;
- One silver ring with clear stones inscribed with "14K" seized from
 AARON M. BOOKER on or about December 19, 2017;
- One rose ring with clear stones inscribed with "ICE BOX" and "18K
 B.2.64 CTW" seized from AARON M. BOOKER on or about
 December 19, 2017;
- One silver necklace inscribed with "10K" with clear stones and pendant with clear stones inscribed "YCC" on the front and "Yung Check Casher" on the back seized from AARON M. BOOKER on or about December 19, 2017;
- One silver necklace inscribed with "10K" with clear stones and pendant with clear stones in the shape of a diamond seized from AARON M. BOOKER on or about December 19, 2017;

- One silver watch link with clear stones seized from AARON M.
 BOOKER on or about December 19, 2017;
- One Gucci bag (SN 337111585795) seized from AARON M.
 BOOKER on or about December 19, 2017;
- One pair of Gucci sunglasses (Model #GG0159S) seized from
 AARON M. BOOKER on or about December 19, 2017;
- One pair of white Christian Louboutin red bottom high-top shoes seized from AARON M. BOOKER on or about December 19, 2017;
- One pair of blue Christian Louboutin red bottom high-top shoes seized from AARON M. BOOKER on or about December 19, 2017;
- 20. One pair of red Christian Louboutin red bottom high-top shoes seized from **AARON M. BOOKER** on or about December 19, 2017;
- One pair of multi-color Christian Louboutin red bottom high-top shoes seized from AARON M. BOOKER on or about December 19, 2017;
- One pair of black Gucci shoes with flames seized from AARON M.
 BOOKER on or about December 19, 2017;
- One pair of white Gucci high-top shoes with tiger seized from
 AARON M. BOOKER on or about December 19, 2017;

- One pair of black Gucci high-top shoes with tiger seized from
 AARON M. BOOKER on or about December 19, 2017;
- One pair of green Gucci high-top shoes seized from AARON M.
 BOOKER on or about December 19, 2017;
- One multi-color wool Gucci child's dress (Model #478581X9D42-3311-8) seized from AARON M. BOOKER on or about December 19, 2017;
- 27. One pair of multi-color Gucci child's slippers (Model #5038939KY20-8972-33) seized from AARON M. BOOKER on or about December 19, 2017;
- 28. One pair of white Gucci baby shoes (Model #455447CPWP0-908520) seized from AARON M. BOOKER on or about December 19, 2017;
- 29. One orange Gucci child's sweatshirt (Model #478371X9A92-7049-18/24) seized from AARON M. BOOKER on or about December 19, 2017;
- One red Gucci child's sweatshirt (Model #497819X9P52-6148-18/24)
 seized from AARON M. BOOKER on or about December 19, 2017;
- 31. One red Gucci child's hat (Model #4594314K638-6500-M) seized

- 32. One pair of Gucci child's ballerina shoes (Model #418997KLQ80-4081-23) seized from AARON M. BOOKER on or about December 19, 2017;
- One pair of blue Balenciaga high-top shoes seized from AARON M.
 BOOKER on or about December 19, 2017;
- One red Salvatore Ferragamo belt (Model #SP-67 9163) seized from AARON M. BOOKER on or about December 19, 2017;
- One pair of red Buscemi high-top shoes seized from AARON M.
 BOOKER on or about December 19, 2017;
- 36. One pair of white Gucci shoes with GG print seized from AARONM. BOOKER on or about December 19, 2017;
- One pair of white Gucci shoes embroidered with "BLIND FOR LOVE" seized from AARON M. BOOKER on or about December 19, 2017;
- One pair of silver Gucci shoes with dragon seized from AARON M.
 BOOKER on or about December 19, 2017;
- One pair of multi-color Gucci shoes with tiger pattern seized from
 AARON M. BOOKER on or about December 19, 2017;
- One pair of Pierre Balmain jeans seized from AARON M. BOOKER on or about December 19, 2017;

- One blue Gucci cardigan with tiger print seized from AARON M.
 BOOKER on or about December 19, 2017;
- One multi-color Versace shirt with logo seized from AARON M.
 BOOKER on or about December 19, 2017;
- 43. One black Moncler maya jacket (Model #C2-091-4036605-68950-999) seized from AARON M. BOOKER on or about December 19, 2017;
- 44. One pair of white Balenciaga shoes (Model #483546-W06F1-9000)seized from AARON M. BOOKER on or about December 19, 2017;
- One pair of red Balenciaga shoes (Model #412345-WAX30-6500)
 seized from AARON M. BOOKER on or about December 19, 2017;
- One pair of black and white Christian Louboutin red bottom high-top shoes seized from AARON M. BOOKER on or about December 19, 2017;
- One black Louis Vuitton bag seized from AARON M. BOOKER on or about December 19, 2017;
- One pair of multi-color Gucci shoes with floral print seized from AARON M. BOOKER on or about December 19, 2017;
- 49. One pair of pastel blue Maison Margiela high-top shoes seized from

- One pair of black Saint Laurent shoes seized from AARON M.
 BOOKER on or about December 19, 2017;
- One Apple iPhone X (SN 1514617511) seized from AARON M.
 BOOKER on or about December 19, 2017;
- 52. One KCI AR-15 100 round magazine with 83 rounds of PMC .223 Remington ammunition seized from UY NGUYEN on or about December 19, 2017; and
- U.S. currency totaling \$16,870 seized by the United States Postal Inspection Service on or about December 5, 2017.

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- i. cannot be located upon the exercise of due diligence;
- has been transferred or sold to, or deposited with, a third person;
- iii. has been placed beyond the jurisdiction of this Court;
- iv. has been substantially diminished in value; or
- v. has been commingled with other property that cannot be divided without difficulty,

it is the intent of the United States, 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), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property.

A TRUE BILL:

FOREPERSON 2 March 2018 DATE

CHRISTOPHER P. CANOVA United States Attorney

DA GOLDBERG TD. Assistant United States Attorn