

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

**UNITED STATES OF AMERICA**

**v.**

**MICHAEL T. HARRIS**  
\_\_\_\_\_ /

**SEALED  
INDICTMENT**

*3:19cr109/TKW*

**THE GRAND JURY CHARGES:**

**COUNT ONE**

Between on or about November 4, 2015, and on or about August 11, 2016,  
in the Northern District of Florida, the defendant,

**MICHAEL T. HARRIS,**

did knowingly and intentionally acquire and obtain possession of a controlled  
substance, namely methadone, morphine sulfate, oxycodone, and alprazolam, by  
misrepresentation, fraud, forgery, deception, and subterfuge.

In violation of Title 21, United States Code, Sections 843(a)(3) and (d)(1).

**COUNT TWO**

Between on or about November 4, 2015, and on or about August 11, 2016,  
in the Northern District of Florida, the defendant,

**CERTIFIED A TRUE COPY**  
Jessica J. Lyublanovits, Clerk of Court  
By *[Signature]*  
Deputy Clerk

Returned in open court pursuant to Rule 6(f)	
Date	<u>9-17-19</u>
<u><i>[Signature]</i></u>	
United States Magistrate Judge	

**MICHAEL T. HARRIS,**

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, to wit, Drug Enforcement Administration Registration Numbers belonging to "D.L.," with the intent to commit, to aid and abet, and in connection with, an unlawful activity that constitutes a violation of federal law, and such transfer, possession, and use was in and affecting interstate commerce, and such offense was committed to facilitate a drug trafficking crime.

In violation of Title 18, United States Code, Sections 1028(a)(7) and 1028(b)(3)(A).

**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, Section 853.

From his engagement in the violation alleged in Count One of this Indictment, the defendant,

**MICHAEL T. HARRIS,**

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all of the defendant's right, title, and interest in:

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

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

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

- i. cannot be located upon the exercise of due diligence;
- ii. has been transferred, sold to, or deposited with a third party;
- 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 subdivided 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 forfeitable property.

### **IDENTITY FRAUD FORFEITURE**

The allegations contained in Count Two of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture to the United States pursuant to the provisions of Title 18, United States Code, Sections 982(a)(2)(B) and 1028(b)(5).

Upon conviction of the violation alleged in Count Two of this Indictment, and pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1028(b)(5), the defendant,

**MICHAEL T. HARRIS,**

shall forfeit to the United States any property, real or personal, constituting, and derived from proceeds obtained, directly and indirectly, as a result of the offense; and any property, real and personal, used or intended to be used to facilitate the commission of the offense.

If any of the property subject to forfeiture pursuant to Count Two of this Indictment, as a result of any act or omission of the defendant:

- i. cannot be located upon the exercise of due diligence;
- ii. 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,


the United States shall be entitled to forfeiture of substitute property up to the value of the property subject to forfeiture under the provisions of Title 21, United

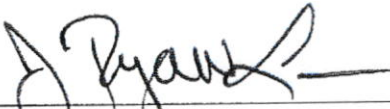
States Code, Section 853(p), which is incorporated by reference in Title 18, United States Code, Sections 982(b)(1) and 1028(g).

TRUE BILL:

\_\_\_\_\_  
FOREPERSON      1

\_\_\_\_\_  
9-17-2019  
DATE

  
\_\_\_\_\_  
LAWRENCE KEEFE  
United States Attorney

  
\_\_\_\_\_  
J. RYAN LOVE  
Assistant United States Attorney