

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA
v.

ROBERT A. BROWN -01
GISELLE S. POLANCO -02
SHAWN A. SILVA -03
JOEL P. SENNON -04
DEONDRE JONES -05
VALERIE G. GAMBOA -06
MARION V. GAMBOA -07
Defendants.

Criminal Case No. 19-116 WES

In Violation of:

21 U.S.C. § 846
21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)
18 U.S.C. § 924(c)
18 U.S.C. § 1001(a)(3)

FILED
OCT - 8 2019
U.S. DISTRICT COURT
DISTRICT OF RHODE ISLAND

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INDICTMENT

The Grand Jury charges that:

COUNT I

(Conspiracy to possess more than one kilogram of cocaine)

No later than May 1, 2017 to August 14, 2019, in the District of Rhode Island and elsewhere, the defendants, ROBERT A. BROWN, GISELLE S. POLANCO, SHAWN A. SILVA, JOEL P. SENNON, DEONDRE JONES, together with others known and unknown to the grand jury, did knowingly, intentionally, and willfully combine, conspire, confederate, and agree with each other to possess cocaine, a Schedule II Controlled Substance, with the intent to distribute, in violation of 21 U.S.C. § 841(a)(1).

(Quantity of Controlled Substance)

With respect to ROBERT A. BROWN, GISELLE S. POLANCO, SHAWN A. SILVA, JOEL P. SENNON, and DEONDRE JONES the amount of cocaine involved in the conspiracy attributable to each, as a result of their individual conduct and the conduct of their coconspirators, reasonably foreseeable to them, is more than 500 grams in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(B);

All in violation of 21 U.S.C. § 846.

COUNT II

Between no later than May 1, 2017 and August 14, 2019, in the District of Rhode Island and elsewhere, the defendants, ROBERT A. BROWN, GISELLE S. POLANCO, SHAWN SILVA, JOEL P. SENNON, and DEONDRE JONES did knowingly and intentionally possess with the intent to distribute more than five hundred grams of cocaine, a Schedule II Controlled Substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(B).

COUNT III

On or about August 14, 2019, in the Central District of California, the defendant, ROBERT A. BROWN, did knowingly and intentionally possess firearms - a Glock 9 mm semiautomatic pistol, model 9, Serial No. YHF154 and a .223 caliber rifle with no markings - in furtherance of the drug trafficking crime alleged in Count I, in violation of 18 U.S.C. § 924(c)(1)(A).

COUNT IV

On or about November 19, 2018, in the District of Rhode Island and elsewhere, the defendants, SHAWN A. SILVA, GISELLE S. POLANCO and ROBERTA. BROWN did knowingly and intentionally with the intent to distribute did possess more than 100 grams of heroin, a Schedule I Controlled Substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(B).

COUNT V

On or about July 27, 2017, in the District of Rhode Island, the defendant, GISELLE POLANCO, did willfully and knowingly make and use a false writing and document, knowing the same to contain a materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the executive branch of the Government of the United States, by submitting an application for a Post Office Box United States Postal Service Form PS-1583 under a false name, well knowing and believing the applicant's name was false
In violation of 18 U.S.C. § 1001(a)(3).

COUNT VI

On or about September 25, 2018, in the District of Rhode Island, the defendant, VALERIE G. GAMBOA, did willfully and knowingly make and use a false writing and document, knowing the same to contain a materially false, fictitious, and fraudulent

statement and entry in a matter within the jurisdiction of the executive branch of the Government of the United States, by submitting an application for a Post Office Box United States Postal Service Form PS-1583 under a false name, well knowing and believing the applicant's name was false
In violation of 18 U.S.C. § 1001(a)(3).

COUNT VII

On or about October 30, 2018, in the District of Rhode Island, the defendant, MARION V. GAMBOA, did willfully and knowingly make and use a false writing and document, knowing the same to contain a materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the executive branch of the Government of the United States, by submitting an application for a Post Office Box United States Postal Service Form PS-1583 under a false name, well knowing and believing the applicant's name was false
In violation of 18 U.S.C. § 1001(a)(3).

FORFEITURE ALLEGATION

Upon conviction of the offenses alleged in Counts I-III, Defendants shall forfeit to the United States of America, pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), the firearms identified in those counts and any associated ammunition, all of which were seized on August 14, 2019 from the Defendant ROBERT A. BROWN's Los Angeles, California apartment.

Further, upon conviction of the offense alleged in Counts I, Defendants shall forfeit any and all right, title, and interest in any and all property used, or intended to


be used, in any manner to commit or facilitate the commission of such offenses, and any and all property derived from or constituting any proceeds the Defendant obtained directly or indirectly as a result of the offense alleged in said Count, and any and all property traceable to such property, including the following assets:

- \$15,550 in United States currency, seized from a United States mail Priority Mail parcel addressed to Evelyn Luna #767 10736 Jefferson Blvd. Culver City, California 90230 on or about November 28, 2018;
- \$12,150.00 in United States currency, seized from a suit jacket located in the Defendant ROBERT A. BROWN's Los Angeles, California bedroom closet on August 14, 2019
- \$20,000.00 in United States currency, seized from a gray back pack located a guest room in the Defendant ROBERT BROWN's Los Angeles, California apartment;

All in accordance with 21 U.S.C. § 853.

AARON WEISMAN
United States Attorney

A TRUE BILL:


WILLIAM J. FERLAND
Assistant U.S. Attorney

REDACTED


RICHARD B. MYRUS
First Assistant United States Attorney

DATE: 8 Oct 19