

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

DASHAWN HAWKINS,  
a/k/a "Jhonny Cash,"

Defendant.

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SEALED INDICTMENT

16 Cr.

**16 CRIM 691**

COUNT ONE

The Grand Jury charges:

1. On or about September 1, 2016, in the Southern District of New York, DASHAWN HAWKINS, a/k/a "Jhonny Cash," the defendant, intentionally and knowingly did distribute and possess with intent to distribute controlled substances, to wit, mixtures and substances containing detectable amounts of heroin and fentanyl.

2. The use of such controlled substances resulted in the death of Colin Cameron on or about September 2, 2016.

(Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(C).)

COUNT TWO

The Grand Jury further charges:

3. From at least in or about August 2016 through at least in or about October 2016, in the Southern District of New York and elsewhere, DASHAWN HAWKINS, a/k/a "Jhonny Cash," the

defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

4. It was a part and an object of the conspiracy that DASHAWN HAWKINS, a/k/a "Jhonny Cash," the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

5. The controlled substance that DASHAWN HAWKINS, a/k/a "Jhonny Cash," the defendant, conspired to distribute and possess with the intent to distribute was mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

#### FORFEITURE ALLEGATION

6. As a result of committing the controlled substance offenses charged in Counts One and Two of this Indictment, DASHAWN HAWKINS, a/k/a "Jhonny Cash," the defendant, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the offenses and any and all property used or intended to be used in any manner or part to commit and

to facilitate the commission of the offenses charged in Counts One and Two of this Indictment.

Substitute Asset Provision

7. If any of the above described forfeitable property, as a result of any act or omission of DASHAWN HAWKINS, a/k/a "Jhonny Cash," the defendant:

a. cannot be located upon the exercise of due diligence;

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


c. has been placed beyond the jurisdiction of the Court;

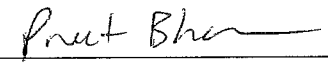
d. has been substantially diminished in value;  
or

e. has been commingled with other property which cannot be subdivided without difficulty;

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 above  
forfeitable property.

(Title 21, United States Code, Section 853.)

  
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FOREPERSON

  
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PREET BHARARA  
United States Attorney

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(21 U.S.C. §§ 812, 841, and 846.)

PREET BHARARA

United States Attorney.

A TRUE BILL

10/19/2016

  
Foreperson.

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