IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	)	
	)	Criminal No. 20-18 J
v.	)	(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C),
	)	841(b)(1)(D))
JESSE DANIEL GINTER	)	**[UNDER SEAL]**

FILED
JUL - 8 2020
CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

INDICTMENT

COUNT ONE

The grand jury charges:

On or about March 12, 2018, in the Western District of Pennsylvania, the defendant, JESSE DANIEL GINTER, did knowingly, intentionally, and unlawfully possess with intent to distribute various pills comprised of mixtures and substances containing detectable amounts of furanyl fentanyl, methoxyacetyl fentanyl, cyclopropyl fentanyl, U-47700, and AMB-Fubinaca, all Schedule I controlled substances, and carfentanil and fentanyl, both Schedule II controlled substances; a quantity of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance; a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance; and a quantity of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 841(b)(1)(D).

FORFEITURE ALLEGATIONS

1. The grand jury re-alleges and incorporates by reference the allegations contained in Count One of this Indictment for the purpose of alleging criminal forfeiture pursuant to Title 21, United States Code, Section 853.

2. The United States hereby gives notice to the defendant charged in Count One that upon his conviction of such offense, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offense to forfeit any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such offense, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offense, including but not limited to, the following:

a) Smith & Wesson Rifle, Model M&P-15, 5.56 NATO/.223 caliber, bearing serial number SP16368, and magazine and ammunition;

b) Smith & Wesson Rifle, Model M&P-15, .22 caliber, bearing serial number DZP8805, and magazine and ammunition;

c) Yugoslavia Rifle, Model 59/66, 7.62x39 caliber, bearing serial number F146277, and magazine and ammunition;

d) Intratec Pistol, Model TECH-DC9, 9mm caliber, bearing serial number D126243, and magazine and ammunition;

e) Hi-Point Rifle, Model 995, 9mm caliber, bearing serial number E74868, and magazines and ammunition;

f) Raven Arms Pistol, Model MP25, .25 caliber, bearing serial number 1214318, and magazine and ammunition.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

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

b. Has been transferred, sold to, or deposited with a third party;

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 intends to seek forfeiture pursuant to Title 21, United States Code, Section 853(p) of any other property of the defendant up to the value of the forfeitable property described in these forfeiture allegations.

A True Bill,

Foreperson

SCOTT W. BRADY
United States Attorney
PA ID No. 88352