

JWV/MKA June 2014

GJ# 19

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

UNITED STATES OF AMERICA)	
)	
v.)	No.
)	
QUANTREY KANTRELL BRYANT,)	
<i>also known as “Quantrey Kentrell Bryant,”</i>)	
<i>also known as “Trey,”</i>)	
CHRISTINA LATASHA PEAVY,)	
MARQUETTE JERRELL HARRIS,)	
DAVID MICHAEL CHAVIS,)	
CURTIS GLENN ROBINSON,)	
NORMAN STANTON,)	
and)	
LANCE DARRELL ALEXANDER,)	
Defendants)	

INDICTMENT

The Grand Jury charges that:

INTRODUCTION

I. Individuals

1. At all times relevant to this Indictment, Defendant **QUANTREY KANTRELL BRYANT**, *also known as “Quantrey Kentrell Bryant,” also known as “Trey,”* was a convicted felon from Jefferson County, Alabama. For a portion of the relevant time, Defendant **BRYANT** was an inmate in the custody of the

Alabama Department of Corrections (“ADOC”). For another portion of the relevant time, Defendant **BRYANT** resided in Jefferson County, Alabama.

At all times relevant to this Indictment:

2. Defendant **CHRISTINA LATASHA PEAVY** was a resident of a particular house in Bessemer, Alabama (“House A”), and was acquainted with Defendant **BRYANT**.

3. Defendant **MARQUETTE JERRELL HARRIS** was a resident of metro-Birmingham and was acquainted with Defendant **BRYANT**.

4. N.B. was a female resident of California and was acquainted with Defendant **BRYANT**. N.B. was employed by Smith+Noble Home, Inc., *also known as* Smith+Noble, LLC (“Smith+Noble”), an online retailer with offices in Corona, California. N.B. was working for Smith+Noble under a name other than N.B. to conceal certain information about her past. By virtue of her employment, N.B. had access to Smith+Noble records that included customer payment information, such as credit/debit card numbers. Defendant **BRYANT** knew about N.B.’s (a) employment at Smith+Noble, (b) access to Smith+Noble customer information, and (c) use of a pseudonym in her interactions with Smith+Noble.

5. Defendant **DAVID MICHAEL CHAVIS, CURTIS GLENN ROBINSON**, and **NORMAN STANTON** each was a resident of metro-

Birmingham, did not have a felony criminal record, and was acquainted with Defendant **BRYANT**.

6. Defendant **LANCE DARRELL ALEXANDER** was a resident of metro-Birmingham and acquaintance of Defendant **BRYANT**. Defendant **ALEXANDER** also was a convicted felon.

II. Background concerning firearms laws

Also at all times relevant to this Indictment:

7. The United States government had in place a legal framework of statutes, regulations, and policies that governed the transfer, sale, and purchase of most firearms within its borders. Certain portions of that framework:

- a. prohibited convicted felons from possessing firearms;
- b. required those selling firearms to the public to be licensed by the Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”); and
- c. required such licensed sellers of firearms to participate in a program designed to provide background checks on potential gun purchasers.

8. Firearms’ sellers that were licensed dealers within the meaning of Chapter 44, Title 18, United States Code, were commonly known as “federal firearms licensees” (“FFLs”).

9. When an individual sought to buy a gun from an FFL, the FFL was required to have the person (“transferee”) complete a Department of the Justice,

Bureau of Alcohol, Tobacco, and Firearms Form 4473, Firearms Transactions Record (“Form 4473”). The Form 4473 required, among other information, the transferee’s name, Social Security number, and other demographic information. The form also inquired whether the transferee was “the actual transferee/buyer of the firearm(s) listed on this form.” The form warned in bold-face print: “Warning: You are not the actual buyer if you are acquiring the firearm(s) on behalf of any other person. If you are not the actual buyer, the dealer cannot transfer the firearm(s) to you.” The form contained an exception for firearms repairs.

10. Once an FFL in Alabama received a Form 4473 from a prospective transferee, the FFL was required to contact the Federal Bureau of Investigation’s National Instant Criminal Background Check System (“NICS”) to request authorization to transfer the firearm. The NICS check was designed to prevent, among other things, felons from purchasing firearms from FFLs.

11. A firearms retailer in the United States could sell its products over the internet rather than at, or in addition to, a brick-and-mortar location. In such online transactions, sellers could accept payment through credit/debit cards and other means. However, an online retailer could not ship a firearm directly to an individual transferee in the United States. Rather, the online retailer had to ship the gun to an FFL. The receiving FFL then was responsible for having the

transferee complete the Form 4473. Upon passing the NICS background check, the transferee could take possession of the firearm from the FFL.

III. Entities

Also at all times relevant to this Indictment:

12. Each of the following entities was an issuer of credit/debit cards and was a “financial institution” as that term is defined in Title 18, United States Code, Section 20: Bank of America; Barclays Bank Delaware; Capital One Bank; Citibank; JP Morgan Chase Bank; Proponent Federal Credit Union; US Bank; and Wells Fargo.

13. Additionally, each of the following entities was an issuer of credit/debit cards: American Express, Discover, and LA Fireman’s Credit Union (*now known as “Firefighters First Credit Union”*).

14. Birmingham Auto Auction was a seller of motor vehicles in metro-Birmingham. Among other methods of payment, Birmingham Auto Auction accepted credit/debit card payments over the telephone.

15. Each of the following entities was an FFL in metro-Birmingham:

- a. Jared’s Jewelry and Pawn;
- b. Alabama Training Institute;
- c. Trading Post Knife and Pawn;
- d. The Fraternal Order of Police Range (“FOP Range”);

- e. Rock Creek Gun Service;
 - f. Simmons Sporting Goods;
 - g. Mark's Cop Shop; and
 - h. TS Arms.
16. Budsgunshop.com was an online firearms' retailer based in Kentucky.
 17. Cheaperthandirt.com was an online firearms' retailer based in Texas.
 18. Impactguns.com was an online firearms' retailer based in Utah.

COUNT ONE
[18 U.S.C. § 1349]

The Grand Jury further charges that:

1. Paragraphs 1 through 18 of the Introduction section of this Indictment are realleged and incorporated into this Count, as if fully restated herein.

The Conspiracy

2. From on or about August 1, 2012, through on or about August 8, 2013, in Jefferson County within the Northern District of Alabama, and elsewhere, the defendants,

QUANTREY KANTRELL BRYANT,
also known as "Quantrey Kentrell Bryant," also known as "Trey,"
CHRISTINA LATASHA PEAVY, and
MARQUETTE JERRELL HARRIS,

did knowingly and willfully combine, conspire, and agree with each other and with others known and unknown to the Grand Jury to knowingly devise and intend to

device a scheme and artifice to defraud multiple individuals and card issuers – including, but not limited to, those entities listed in paragraphs 12 and 13 of the Introduction section of this Indictment – and to obtain moneys and property from multiple individuals and card issuers – including, but not limited to, those entities listed in paragraphs 12 and 13 of the Introduction section of this Indictment – by means of materially false and fraudulent pretenses, representations, and promises and, for the purpose of executing such scheme and artifice:

a. to transmit and cause to be transmitted by means of wire and radio communication in interstate and foreign commerce, any writings, signs, signals, pictures, and sounds, that is: telephone, text, and computer communications into and out of the State of Alabama and the Northern District of Alabama, in violation of Title 18, United States Code, Sections 1349 and 1343.

b. to deposit and cause to be deposited any matter or thing whatever to be sent and delivered by United States mail and by private and commercial interstate carriers and knowingly to cause to be delivered by mail and such carriers according to the direction thereon any such matter and thing, in violation of Title 18, United States Code, Sections 1349 and 1341.

Manner and Means

3. The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

a. While still an ADOC inmate, Defendant **BRYANT** communicated with N.B., who was in California, by various telephonic and computerized means. During these communications, Defendant **BRYANT** sought information about Smith+Noble customers, including credit/debit card information.

b. In or about August 2012, N.B. began supplying such information to Defendant **BRYANT**.

c. On or about August 21, 2012, co-conspirators unknown to the Grand Jury used information about Smith+Noble customer F.N. to submit a fraudulent application for a Capital One credit/debit card account, using House A as a mailing address for the new card.

d. Defendant **PEAVY** received Visa credit/debit card XXXX XXXX XXXX 7994 (“Visa 7994”), which Capital One (a) issued in F.N.’s name and (b) mailed to House A.

e. Thereafter, Defendant **BRYANT** caused information about Visa 7994 to be provided to a non-incarcerated person (“Person A”). **BRYANT** asked and directed that Person A use Visa 7994 to apply

funds to certain ADOC inmate accounts. Person A conducted at least one financial transaction using Visa 7994.

f. Conspirators unknown to the Grand Jury used and attempted to use Visa 7994 to conduct transactions with online firearms' seller Budsgunshop.com.

g. On or about September 17, 2012, co-conspirators unknown to the Grand Jury used Wells Fargo Mastercard XXXX XXXX XXXX 7355 ("Mastercard 7355"), which belonged to Smith+Noble customer S.P., to apply funds to certain ADOC inmate accounts, including the account of Defendant **BRYANT**.

h. After Defendant **BRYANT** was released from ADOC custody, he continued to solicit and obtain from N.B. information about Smith+Noble customers, including credit/debit card information.

i. N.B. continued to transmit Smith+Noble customer information to Defendant **BRYANT** by means of interstate telephone, text, and computer communications until on or about August 8, 2013.

j. Defendant **BRYANT** and others working with him used unlawfully obtained credit/debit card information to fund various purchases, including (1) online purchases of guns from Budsgunshop.com, Cheaperthandirt.com, and Impactguns.com and

(2) vehicle purchases from Birmingham Auto Auction for which payment was made by transmitting credit/debit card information over the telephone.

k. Defendant **BRYANT** made and caused to be made online purchases of goods, including firearms, knowingly causing the goods to be transported from outside the State of Alabama into the Northern District of Alabama by means of United States mail and private commercial interstate carriers.

l. In February and March of 2013, Defendant **HARRIS** took possession of several vehicles from Birmingham Auto Auction, ostensibly making payment for each by means of credit/debit card numbers provided to Birmingham Auto Auction personnel over the telephone by a purported relative of Defendant **HARRIS**. The purported relative on the other end of the telephone calls actually was Defendant **BRYANT**.

All in violation of Title 18, United States Code, Sections 1349, 1341, and 1343.

COUNT TWO
[18 U.S.C. §§ 1028A and 2]

The Grand Jury further charges that:

On or about February 19, 2013, in Jefferson County, within the Northern District of Alabama, and elsewhere, the defendants,

QUANTREY KANTRELL BRYANT,
also known as “Quantrey Kentrell Bryant,” also known as “Trey,”
and MARQUETTE JERRELL HARRIS,

aided and abetted by others known and unknown to the Grand Jury, knowingly did transfer and possess and use, without lawful authority, LA Fireman’s Credit Union Visa card XXXX XXXX XXXX 2957, knowing that this number was a means of identification of an actual person, during and in relation to the Wire Fraud Conspiracy charged in Count One of this Indictment.

All in violation of Title 18, United States Code, Sections 1028A and 2.

COUNT THREE
[18 U.S.C. §§ 1028A and 2]

The Grand Jury further charges that:

On or about March 5, 2013, in Jefferson County, within the Northern District of Alabama, and elsewhere, the defendants,

QUANTREY KANTRELL BRYANT,
also known as “Quantrey Kentrell Bryant,” also known as “Trey,”
and MARQUETTE JERRELL HARRIS,

aided and abetted by others known and unknown to the Grand Jury, knowingly did transfer and possess and use, without lawful authority, Discover card XXXX XXXX XXXX 3015, knowing that this number was a means of identification of an actual person, during and in relation to the Wire Fraud Conspiracy charged in Count One of this Indictment.

All in violation of Title 18, United States Code, Sections 1028A and 2.

COUNT FOUR
[18 U.S.C. §§ 1028A and 2]

The Grand Jury further charges that:

On or about March 5, 2013, in Jefferson County, within the Northern District of Alabama, and elsewhere, the defendants,

QUANTREY KANTRELL BRYANT,
also known as “Quantrey Kentrell Bryant,” also known as “Trey,”
and MARQUETTE JERRELL HARRIS,

aided and abetted by others known and unknown to the Grand Jury, knowingly did transfer and possess and use, without lawful authority, Barclay’s Master Card XXXX XXXX XXXX 4530, knowing that this number was a means of identification of an actual person, during and in relation to the Wire Fraud Conspiracy charged in Count One of this Indictment.

All in violation of Title 18, United States Code, Sections 1028A and 2.

COUNT FIVE
[18 U.S.C. §§ 1028A and 2]

The Grand Jury further charges that:

On or about March 12, 2013, in Jefferson County, within the Northern District of Alabama, and elsewhere, the defendants,

QUANTREY KANTRELL BRYANT,
also known as “Quantrey Kentrell Bryant,” also known as “Trey,”
and MARQUETTE JERRELL HARRIS,

aided and abetted by others known and unknown to the Grand Jury, knowingly did transfer and possess and use, without lawful authority, Bank of America American Express card XXXX XXXXXX X5305, knowing that this number was a means of identification of an actual person, during and in relation to the Wire Fraud Conspiracy charged in Count One of this Indictment.

All in violation of Title 18, United States Code, Sections 1028A and 2.

COUNT SIX
[18 U.S.C. §§ 1028A and 2]

The Grand Jury further charges that:

On or about May 1, 2013, in Jefferson County, within the Northern District of Alabama, and elsewhere, the defendant,

QUANTREY KANTRELL BRYANT,
also known as “Quantrey Kentrell Bryant,” also known as “Trey,”

aided and abetted by others known and unknown to the Grand Jury, knowingly did transfer and possess and use, without lawful authority, Capital One Visa card XXXX XXXX XXXX 9019, knowing that this number was a means of identification of an actual person, during and in relation to the Wire Fraud and Mail Fraud Conspiracy charged in Count One of this Indictment.

All in violation of Title 18, United States Code, Sections 1028A and 2.

COUNT SEVEN
[18 U.S.C. § 371]

The Grand Jury further charges that:

1. Paragraphs 1 through 18 of the Introduction section of this Indictment are realleged and incorporated into this Count, as if fully restated herein.

The Conspiracy

2. From in or about September 4, 2012, through on or about May 9, 2013, in Jefferson County within the Northern District of Alabama, and elsewhere, the defendants,

QUANTREY KANTRELL BRYANT,
also known as “Quantrey Kentrell Bryant,” also known as “Trey,”
DAVID MICHAEL CHAVIS,
CURTIS GLENN ROBINSON,
NORMAN STANTON, and
LANCE DARRELL ALEXANDER,

did willfully, knowingly, and unlawfully combine, conspire, confederate, and agree together with each other and other persons known and unknown to the Grand Jury to commit certain offenses against the United States, to wit:

- a. to violate Title 18, United States Code, Sections 922(a)(6) and 924(a)(2), in connection with the acquisition of certain firearms from FFLs, by knowingly making and causing to be made false and fictitious written statements to the respective FFLs, which statements were intended and likely to deceive FFL employees as to a fact material to the lawfulness of each sale of the said firearms by executing a Form 4473 to the effect that certain named individuals were the actual transferees/buyers of the firearms indicated on the Forms 4473, when, in fact, as the defendants then knew, those named individuals were not the actual transferees/buyers of the firearms; and
- b. to violate Title 18, United States Code, Sections 922(g)(1) and 924(a)(1)(B) by having one or more individuals possess firearms in and affecting commerce, despite the fact that each of those individuals was prohibited from lawfully possessing said firearms because of each individual's status as previously convicted felon.

All in violation of Title 18, United States Code, Sections 371, 922(a)(6), and 922(g)(1).

Objectives of the Conspiracy

3. It was an objective of the conspiracy for certain individuals – including Defendants **CHAVIS, ROBINSON, and STANTON** and others known and unknown to the Grand Jury – to falsely complete Forms 4473 indicating that each was the actual transferee/buyer of certain firearms when each of these defendants then and there well knew that he (a) was not the actual transferee/buyer and (b) was acting as an intermediary for individuals who had felony convictions and, thus, could not possess guns lawfully.

4. It was further an objective of the conspiracy for Defendants **BRYANT** and **ALEXANDER** – each a convicted felon – to obtain and possess firearms that neither could purchase lawfully.

Manner and Means

5. Defendant **BRYANT** and others known and unknown to the Grand Jury caused firearms to be ordered from online firearms' sellers.

6. Defendant **BRYANT** and others known and unknown to the Grand Jury caused these online gun orders to be

- a. made in the names of Defendants **CHAVIS, ROBINSON, and STANTON**, and others known and unknown to the Grand Jury, each of whom the conspirators believed could pass a NICS background check (collectively, “straw purchasers”), and

b. shipped to selected FFLs in metro-Birmingham.

7. Various straw purchasers – including Defendants **CHAVIS**, **ROBINSON**, and **STANTON** – acted at the behest of Defendant **BRYANT** to complete materially false Forms 4473 at Birmingham-area FFLs on which each straw purchaser falsely stated and certified that he/she was the actual transferee/buyer of the subject firearms.

8. Defendants **BRYANT** and **ROBINSON** and others known and unknown to the Grand Jury sold certain of the firearms at pawn shops.

9. Defendant **BRYANT** also sold certain of the firearms to Defendant **ALEXANDER**, who could not possess a firearm lawfully due to his two previous felony convictions for unauthorized breaking and entering of a vehicle.

10. In total, the conspirators ordered approximately 27 firearms from online firearms' sellers, taking possession of approximately 24 of those weapons.

Overt Acts

11. On or about March 12, 2013, Defendant **BRYANT** caused an order to be placed in the name of Defendant **ROBINSON** with Budsgunshop.com, directing that the order be shipped to Jared's Jewelry and Pawn. The order was for a Zastava PAP M92 PV 762 caliber pistol (S/N M92PV015667), a second Zastava PAP M92 PV 762 caliber pistol (S/N M92PV015668), and a Glock 22 .40 caliber pistol (S/N UKC 673).

12. On or about March 14, 2013, Defendant **ROBINSON** completed a Form 4473 at Jared's Jewelry and Pawn on which he falsely stated and certified that he was the actual transferee/buyer of all three weapons listed in paragraph 11 of this Count, when in truth and in fact, he was not.

13. On or about March 25, 2013, Defendant **BRYANT** caused an order to be placed in the name of Defendant **ROBINSON** with Budsgunshop.com, directing that the order be shipped to Mark's Cop Shop. The order was for a DPMS Panther .223 caliber rifle (S/N FH188149), a Glock 21 .45 caliber pistol (S/N TYN553), and a Kahr Arms P.380 pistol (S/N RD0697).

14. On or about March 28, 2013, and April 14, 2013, Defendant **ROBINSON** completed two Forms 4473 at Mark's Cop Shop on which he falsely stated and certified that he was the actual transferee/buyer of the weapons listed in paragraph 13 of this Count, when in truth and in fact, he was not.

15. On or about April 12, 2013, Defendant **BRYANT** caused an order to be placed in the name of Person B with Budsgunshop.com, directing that the order be shipped to Alabama Training Institute. The order was for a Sig Sauer P229 9 MM pistol (S/N AKU03786), a DPMS AR-15 .233 caliber rifle (S/N FH193166), and a Bushmaster A-15 .223 caliber rifle (S/N CBC019216).

16. On or about April 12, 2013, Person B completed a Form 4473 at Alabama Training Institute that falsely stated and certified that Person B was the actual transferee/buyer of the three weapons listed in paragraph 15 of this Count.

17. On or about April 12, 2013, Defendant **BRYANT** sold the DPMS AR-15 .233 caliber rifle (S/N FH193166) to Midfield Quick Pawn.

18. On or about April 9, 2013, Defendant **BRYANT** caused an order to be placed in the name of Defendant **ROBINSON** with Budsgunshop.com, directing that the order be shipped to TS Arms. The order was for a Sig Sauer RM400 .223 caliber rifle (S/N 38B014931), a Glock 23 .40 caliber pistol (S/N UKL 432), and a Bushmaster AR-15 .223 caliber rifle (S/N BF4000415).

19. On or about April 11, 2013, and April 15, 2013, Defendant **ROBINSON** completed two Forms 4473 at TS Arms on which he falsely stated and certified that he was the actual transferee/buyer of the weapons listed in paragraph 18 of this Count, when in truth and in fact, he was not.

20. On or about April 11, 2013, Defendant **BRYANT** sold the a Glock 23 .40 caliber pistol (S/N UKL 432) to Midfield Quick Pawn.

21. On or about April 19, 2013, Defendant **BRYANT** caused an order to be placed in the name of Defendant **CHAVIS** with Cheaperthandirt.com, directing that the order be shipped to Trading Post Knife and Pawn. The order was for a Bushmaster AR-15 .223 caliber rifle (S/N ARB04259), a Glock 23 .40 caliber

pistol (S/N TVE078), and a Smith & Wesson M&P .223 caliber rifle (S/N SP91927).

22. On or about April 23, 2013, Defendant **CHAVIS** completed a Form 4473 at Trading Post Knife and Pawn on which he falsely stated and certified that he was the actual transferee/buyer of all three weapons listed in paragraph 21 of this Count, when in truth and in fact, he was not.

23. On or about April 23, 2013, Defendant **BRYANT** caused an order to be placed in the name of Defendant **STANTON** with Cheaperthandirt.com, directing that the order be shipped to the FOP Range, Inc. The order was for a Magnum Research Baby Eagle 9 mm pistol (S/N 42312652), a Colt AR-15 .223 caliber rifle (S/N LE153173), and a Bushmaster AR-15 .223 caliber rifle (S/N ARB04906).

24. On or about April 26, 2013, Defendant **STANTON** completed a Form 4473 at the FOP Range, Inc. on which he falsely stated and certified that he was the actual transferee/buyer of all three weapons listed in paragraph 23 of this Count, when in truth and in fact, he was not.

25. On or about April 19, 2013, Defendant **BRYANT** caused an order to be placed in the name of Defendant **CHAVIS** with Impactguns.com, directing that the order be shipped to Rock Creek Gun Service. The order was for a Diamondback DB-15 .223 caliber rifle (S/N DB1506997), a WMD AR-15 .223

caliber rifle (S/N WMD0071), and a Ruger SR40 .40 caliber pistol (S/N 342-57268).

26. On or about April 22, 2013, Defendant **ROBINSON** completed a Form 4473 at Rock Creek Gun Service on which he falsely stated and certified that he was the actual transferee/buyer of all three weapons listed in paragraph 25 of this Count, when in truth and in fact, he was not.

27. On or about May 1, 2013, Defendant **BRYANT** caused an order to be placed in the name of Defendant **STANTON** with Impactguns.com, directing that the order be shipped to Simmons Sporting Guns. The order was for a Ruger SR-556 .223 caliber rifle (S/N 591-08805), a Bushmaster Carbon 15 .223 caliber rifle (S/N CBC022049), and an FNH FNS-9 9mm pistol (S/N GKU0066138).

28. On or about May 2, 2013, Defendant **BRYANT** caused an order to be placed in the name of Person C with Cheaperthandirt.com, directing that the order be shipped to Simmons Sporting Guns. The order was for a Bushmaster AR-15 .223 caliber rifle (S/N ARB05143), a Glock 26 9mm pistol (S/N TVL956), and a Magnum Research Baby Eagle 9mm pistol (S/N 42312680).

29. On or about May 6, 2013, Defendant **STANTON** completed a Form 4473 at FFL Simmons Sporting Goods on which he falsely stated and certified that he was the actual transferee/buyer of all three weapons listed in paragraph 27 of this Count, when in truth and in fact, he was not.

30. On or about May 9, 2013, Defendants **BRYANT** and **STANTON** arrived at Simmons Sporting Goods and took possession of the firearms listed in paragraph 27 of this Count, with Defendant **BRYANT** carrying the pistol and Defendant **STANTON** carrying the two rifles away from the counter.

31. Throughout the Spring of 2013, Defendant **ALEXANDER** received firearms from Defendant **BRYANT**. In exchange for compensation, Defendant **ALEXANDER** assisted Defendant **BRYANT** in selling some of the firearms to private buyers.

All in violation of Title 18, United States Code, Sections 371, 922(a)(6), and 922(g)(1).

COUNT EIGHT
[18 U.S.C. § 922(g)(1)]

The Grand Jury charges that:

On or about the May 9, 2013, in Jefferson County, within the Northern District of Alabama, the defendant,

QUANTREY KANTRELL BRYANT,
also known as “Quantrey Kentrell Bryant,” also known as “Trey,”

after having been convicted on January 9, 2008, in the Circuit Court of Jefferson County, Alabama, Bessemer Division, of the offense of Second-Degree Robbery in case no. CC 07-000025, and also of the offense of Second-Degree Robbery in case

no. CC 07-000026, and also of the offense of Second-Degree Robbery in case no. CC 07-000027, each of the said offenses being a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting commerce a firearm, that is, a FNH 9mm pistol (S/N GKU0066138), in violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE
[18 U.S.C. § 982(a)(2)(A)]

1. The allegations contained in **COUNT ONE** 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)(2)(A).

2. Upon conviction of the offenses alleged in **COUNT ONE** of this Indictment, the defendants, **QUANTREY KANTRELL BRYANT**, *also known as “Quantrey Kentrell Bryant,” also known as “Trey,”* **CHRISTINA LATASHA PEAVY**, and **MARQUETTE JERRELL HARRIS** shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any property constituting and derived from proceeds traceable to such offenses.

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

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

- b. has been transferred and sold to, and deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; and
- e. has been commingled with other property which 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), to seek forfeiture of any other property of said defendant up to the value of the above-described forfeitable property.

NOTICE OF FORFEITURE
[18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c)]

1. The allegations contained in Count **EIGHT** of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).

2. Upon conviction of the offense charged in Count **EIGHT** of this Indictment, in violation of 18 U.S.C. § 922 (g)(1), the defendant, **QUANTREY KANTRELL BRYANT**, *also known as “Quantrey Kentrell Bryant,” also known as “Trey,”* shall forfeit to the United States of America, pursuant to 18

U.S.C. § 924(d) and 28 U.S.C. § 2461(c), all firearms and ammunition involved in or used in the commission of the offense, including but not limited to, a FNH 9mm pistol (S/N GKU0066138).

A TRUE BILL

/s/
FOREPERSON OF THE GRAND JURY

JOYCE WHITE VANCE
United States Attorney

/s/
MELISSA K. ATWOOD
Assistant United States Attorney