

FILED

NOV 16 2023

**CLERK US DISTRICT COURT
SOUTHERN DISTRICT OF IOWA**

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA**

UNITED STATES OF AMERICA,

v.

MAJOK MAJOK,
also known as "Jok" and "Magok Magok,"
SANTIZ CORTEZ LANGFORD JR.,
also known as "Tiz" and "Tizwick,"
SEMAJ JOHNSON,
also known as "Maj" and "10mill,"
AVONTAE LAMAR TUCKER,
also known as "Tae Tae,"
DAHABA BAHARI LULA,
also known as "Haba,"
DAWN ELLEASE ROBINSON,
also known as "Dawn Ellease Colbert," and
DEON ELLEASE COOPER,

Defendants.

Criminal No. 4:23-cr-153

INDICTMENT

- T. 18 U.S.C. § 922(a)(6)
- T. 18 U.S.C. § 922(g)(1)
- T. 18 U.S.C. § 922(g)(3)
- T. 18 U.S.C. § 922(o)
- T. 18 U.S.C. § 924(a)(2)
- T. 18 U.S.C. § 924(a)(8)
- T. 18 U.S.C. § 924(a)(1)(A)
- T. 18 U.S.C. § 924(c)(1)(A)(i)
- T. 18 U.S.C. § 924(c)(1)(A)(ii)
- T. 18 U.S.C. § 924(c)(1)(B)(ii)
- T. 18 U.S.C. § 924(d)
- T. 18 U.S.C. § 932(b)(1)
- T. 18 U.S.C. § 932(b)(2)
- T. 18 U.S.C. § 932(c)(1)
- T. 18 U.S.C. § 932(c)(2)
- T. 18 U.S.C. § 933(a)(1)
- T. 18 U.S.C. § 933(a)(2)
- T. 18 U.S.C. § 933(a)(3)
- T. 18 U.S.C. § 933(b)
- T. 18 U.S.C. § 934
- T. 18 U.S.C. § 1951
- T. 18 U.S.C. § 1962(d)
- T. 21 U.S.C. § 841(a)(1)
- T. 21 U.S.C. § 841(b)(1)(A)
- T. 21 U.S.C. § 841(b)(1)(B)
- T. 21 U.S.C. § 841(b)(1)(C)
- T. 21 U.S.C. § 841(b)(1)(D)
- T. 21 U.S.C. § 846
- T. 21 U.S.C. § 853
- T. 26 U.S.C. § 5872
- T. 28 U.S.C. § 2461(c)

THE GRAND JURY CHARGES:

INTRODUCTION

The Enterprise

1. At various times relevant to this Indictment, the defendants, MAJOK MAJOK, also known as “Jok” and “Magok Magok,” SANTIZ CORTEZ LANGFORD JR., also known as “Tiz” and “Tizwick,” SEMAJ JOHNSON, also known as “Maj” and “10mill,” AVONTAE LAMAR TUCKER, also known as “Tae Tae,” DAHABA BAHARI LULA, also known as “Haba,” DAWN ELLEASE ROBINSON, also known as “Dawn Ellease Colbert,” DEON ELLEASE COOPER, and others known and unknown to the Grand Jury, were members and associates of a criminal organization known as Only My Brothers (“OMB”) (hereinafter “ENTERPRISE”), whose members and associates engaged in acts of violence, including acts involving murder, robbery, and assault, as well as controlled substance distribution, firearms trafficking, firearms straw purchasing, and other criminal activities, and which was based in, and operated throughout, the Des Moines, Iowa, area.

2. The ENTERPRISE, including its leadership, its membership, and its associates constituted an “enterprise,” as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact, that engaged in, and the activities of which affected, interstate and foreign commerce. The ENTERPRISE constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the ENTERPRISE.

3. The ENTERPRISE's origins began in early- to mid-2021. Prior to that, some members and associates of the ENTERPRISE referred to themselves as various other names, including C-Block, 600, C600, East Side Crips, Crips, and Gangster Disciples. In approximately early- to mid-2021, the younger members and associates of the ENTERPRISE began more closely aligning and referring to themselves as OMB.

Purposes of the Enterprise

4. The principal purposes and objectives of the ENTERPRISE are to distribute controlled substances, obtain money and things of value, and earn and maintain respect in the neighborhood. To achieve those purposes and objectives, members of the ENTERPRISE committed acts involving attempted murder, robbery, and assault; threatened to commit acts of violence; trafficked in controlled substances and firearms; and straw purchased firearms. The ENTERPRISE and its members also sought to:

a. Enrich members and associates of the ENTERPRISE through, among other things, the distribution of controlled substances, including fentanyl and marijuana.

b. Preserve and protect the power, territory, and profits of the ENTERPRISE through the use of intimidation, robbery, assault, violence, threats of violence, and acts involving murder.

c. Promote and enhance the ENTERPRISE and its members' and associates' activities.

d. Keep victims and witnesses in fear of the ENTERPRISE and in fear of its members and associates through threats of violence.

e. Provide support to ENTERPRISE members who were charged with, or incarcerated for, gang-related activities.

f. Prevent and retaliate against acts of violence perpetrated against the ENTERPRISE, its members, and its associates.

g. Commit acts of violence against members and associates of rival gangs known as Strap Gang, SMG, Heavy Hittas, 500, Bloods, and Vice Lords, as well as other rivals, and to retaliate against acts of violence perpetrated against the ENTERPRISE, its members and associates, by these rival gang members and associates and other rivals.

h. Earn respect or “street” credibility by perpetrating acts of violence, including shootings and acts involving murder against others and responding to any perceived disrespect to members of the ENTERPRISE.

Means and Methods of the Enterprise

5. Among the means and methods by which the members and the associates of the ENTERPRISE conducted and participated in the conduct of the affairs of the ENTERPRISE were the following:

a. Members and associates of the ENTERPRISE operated and conducted their affairs through a series of principles or codes.

b. Members and associates of the ENTERPRISE managed the procurement, transfer, use, concealment, and disposal of firearms and dangerous

weapons within the ENTERPRISE to protect gang-related personnel and operations, and to deter, eliminate, and retaliate against competitors and other rival street gangs and persons.

c. Members and associates of the ENTERPRISE agreed to distribute and distributed quantities of controlled substances, including fentanyl and marijuana.

d. Members and associates of the ENTERPRISE agreed, planned, and conspired to commit acts of violence and shootings, including acts involving murder and assault, against rival gang members and associates.

e. Members and associates of the ENTERPRISE used, carried, and possessed firearms.

f. Members and associates of the ENTERPRISE represented themselves to be and identified themselves as gang members of the OMB Street Gang to intimidate victims and rivals, and in order to enhance their street credibility.

g. Members and associates of the ENTERPRISE promoted a climate of fear through violence and threats of violence.

h. Members and associates of the ENTERPRISE showed their membership by using a set of hand-signs and also used hand gestures to disrespect rival gang members. Members and associates of the ENTERPRISE used symbols such as a shark emoji to show their alliance.

i. Members and associates of the ENTERPRISE utilized the color blue, as well as shark-related clothing, accessories, and terminology, to represent their association with the ENTERPRISE.

j. At times, the ENTERPRISE's members and associates used symbols and code words to communicate in order to avoid revealing their criminal activity.

k. ENTERPRISE members and associates often communicated through various forms of electronic communication, including social media, phone calls, and text messages.

THE GRAND JURY FURTHER CHARGES:

COUNT 1
(Racketeering Conspiracy)

Paragraphs 1 through 5 are hereby realleged and incorporated as if fully set forth herein.

From in or about May 2021 through the present, both dates being approximate and inclusive, within the Southern District of Iowa and elsewhere, the defendants, MAJOK MAJOK, also known as "Jok" and "Magok Magok," SANTIZ CORTEZ LANGFORD JR., also known as "Tiz" and "Tizwick," SEMAJ JOHNSON, also known as "Maj" and "10mill," AVONTAE LAMAR TUCKER, also known as "Tae Tae," DAHABA BAHARI LULA, also known as "Haba," DAWN ELLEASE ROBINSON, also known as "Dawn Ellease Colbert," and DEON ELLEASE COOPER, together with other persons known and unknown, being persons employed by and associated with the ENTERPRISE, which engaged in, and the activities of which affected,

interstate and foreign commerce, knowingly, and intentionally, conspired to violate 18 U.S.C. § 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of that ENTERPRISE through a pattern of racketeering activity, as that term is defined by 18 U.S.C. § 1961(1) and (5), consisting of multiple:

- a. Acts involving murder, in violation of Iowa Code Sections 707.2, 707.3, 707.11, 706.1, 703.1, and 703.2;
- b. Acts involving robbery, in violation of Iowa Code Sections 711.2, 711.3, 706.1, 703.1, and 703.2;
- c. Acts indictable under Title 18, United States Code, Section 1951 (relating to interference with commerce, robbery, or extortion);
- d. Acts indictable under Title 18, United States Code, Section 932 (relating to straw purchasing);
- e. Acts indictable under Title 18, United States Code, Section 933 (relating to trafficking in firearms); and
- f. Offenses involving the felonious manufacture, importation, receiving concealment, buying, selling, and otherwise dealing in controlled substances, in violation of Title 21, United States Code, Sections 841 and 846.

It was a further part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the ENTERPRISE.

Overt Acts

6. In furtherance of the conspiracy, and to achieve the objects thereof, the defendants and others performed and caused to be performed the following acts, among others, in the Southern District of Iowa and elsewhere:

a. On November 3, 2021, AVONTAE LAMAR TUCKER, also known as “Tae Tae,” fired multiple shots from a firearm at a rival gang member while attending a celebration of life party in Des Moines, Iowa.

b. On June 10, 2022, AVONTAE LAMAR TUCKER, also known as “Tae Tae,” along with another person unknown to the grand jury, robbed a Kum & Go in West Des Moines, Iowa, a business engaged in interstate commerce, at gunpoint, pistol-whipping the clerk multiple times in the process.

c. On June 21, 2022, AVONTAE LAMAR TUCKER, also known as “Tae Tae,” along with another person known to the grand jury, robbed a Casey’s General Store in Des Moines, Iowa, a business engaged in interstate commerce, at gunpoint.

d. On June 25, 2022, DEON ELLEASE COOPER straw purchased a firearm for SANTIZ CORTEZ LANGFORD JR., also known as “Tiz” and “Tizwick.” That firearm was later found at the residence of a known associate of the ENTERPRISE.

e. On July 21, 2022, an OMB member known to the grand jury conspired with another person known to the grand jury to straw purchase a Glock, model 27, .40 caliber pistol, with serial number AGSP951. That firearm was found

in the possession of MAJOK MAJOK, also known as “Jok” and “Magok Magok,” on February 17, 2023, with an automatic selector switch classified as a machinegun attached to it.

f. On July 22, 2022, an OMB member known to the grand jury conspired with another person known to the grand jury to straw purchase a Glock, model 29, ten-millimeter pistol, with serial number BXHT254. That firearm was found in the possession of SEMAJ JOHNSON, also known as “Maj” and “10mill,” on August 23, 2022. JOHNSON was also found in the possession of fentanyl pills, which he intended to deliver.

g. On October 22, 2022, DAWN ELLEASE ROBINSON, also known as “Dawn Ellease Colbert,” straw purchased two firearms for SANTIZ CORTEZ LANGFORD JR., also known as “Tiz” and “Tizwick.” LANGFORD later provided one of those guns to an ENTERPRISE member whose identity is known to the grand jury. That firearm was found on the deceased body of that same ENTERPRISE member during a gang shooting at the Starts Right Here School.

h. On October 29, 2022, DEON ELLEASE COOPER straw purchased a Glock, model 20 Gen 4, with serial number BYGE189 for SANTIZ CORTEZ LANGFORD JR., also known as “Tiz” and “Tizwick.” That firearm was found in LANGFORD’s possession in February 2023.

i. On January 3, 2023, DAWN ELLEASE ROBINSON, also known as “Dawn Ellease Colbert,” straw purchased a Glock, model 20 Gen 4, ten-millimeter pistol, with serial number BXHG838, for SANTIZ CORTEZ LANGFORD JR., also

known as “Tiz” and “Tizwick.” In February 2023, that firearm was found in LANGFORD’s possession.

j. On at least February 9, 2023; March 8, 2023; April 18, 2023; and July 11, 2023, DAHABA BAHARI LULA, also known as “Haba,” distributed fentanyl.

k. On at least March 22, 2023; April 26, 2023; May 18, 2023; and June 22, 2023, MAJOK MAJOK, also known as “Jok” and “Magok Magok,” distributed fentanyl.

SPECIAL SENTENCING ALLEGATION

The Grand Jury further alleges that:

From a date unknown, but by at least November 1, 2021, and continuing until July 20, 2023, in the Southern District of Iowa and elsewhere, the defendants, MAJOK MAJOK, also known as “Jok” and “Magok Magok,” SANTIZ CORTEZ LANGFORD JR., also known as “Tiz” and “Tizwick,” SEMAJ JOHNSON, also known as “Maj” and “10mill,” AVONTAE LAMAR TUCKER, also known as “Tae Tae,” and DAHABA BAHARI LULA, also known as “Haba,” conspired, with each other and other persons known and unknown to the Grand Jury, to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely: 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 846.

All in violation of Title 18, United States Code, Section 1962(d).

THE GRAND JURY FURTHER CHARGES:

COUNT 2

(Conspiracy to Distribute a Controlled Substance)

From a date unknown, but by at least November 1, 2021, and continuing until July 20, 2023, in the Southern District of Iowa and elsewhere, the defendants, MAJOK MAJOK, also known as “Jok” and “Magok Magok,” SANTIZ CORTEZ LANGFORD JR., also known as “Tiz” and “Tizwick,” SEMAJ JOHNSON, also known as “Maj” and “10mill,” AVONTAE LAMAR TUCKER, also known as “Tae Tae,” and DAHABA BAHARI LULA, also known as “Haba,” conspired, with each other and other persons known and unknown to the Grand Jury, to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely: 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

This is a violation of Title 21, United States Code, Sections 846 and 841(b)(1)(A).

THE GRAND JURY FURTHER CHARGES:

COUNT 3

(Conspiracy to Distribute a Controlled Substance)

From a date unknown, but by at least June 2022, and continuing until July 20, 2023, in the Southern District of Iowa and elsewhere, the defendants, MAJOK MAJOK, also known as “Jok” and “Magok Magok,” SANTIZ CORTEZ LANGFORD JR., also known as “Tiz” and “Tizwick,” and AVONTAE LAMAR TUCKER, also known as “Tae Tae,” conspired, with each other and other persons known and unknown to the Grand Jury, to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely: a mixture and substance containing marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

This is a violation of Title 21, United States Code, Sections 846 and 841(b)(1)(D).

THE GRAND JURY FURTHER CHARGES:

COUNT 4

(Unlawful User in Possession of a Firearm and Ammunition)

On or about November 3, 2021, in the Southern District of Iowa, the defendant, AVONTAE LAMAR TUCKER, also known as “Tae Tae,” in and affecting commerce, knowingly possessed a firearm and ammunition, namely, one or more of the following:

1. a loaded Taurus, model G2C, nine-millimeter pistol, with serial number ABD492487;
2. one (1) cartridge case of FC nine-millimeter Luger ammunition; and
3. one (1) cartridge case of Hornady nine-millimeter Luger ammunition.

At the time of the offense, the defendant knew he was an unlawful user of, or addicted to, a controlled substance.

This is a violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(2).

THE GRAND JURY FURTHER CHARGES:

COUNT 5

(False Statement During Purchase of a Firearm)

On or about June 3, 2022, in the Southern District of Iowa, the defendant, DEON ELLEASE COOPER, in connection with the acquisition of a firearm, namely a Ruger, model 57, 5.7x28-millimeter pistol, with serial number 643-75596, from JT Guns and Supply LLC in Des Moines, Iowa, a licensed dealer of firearms, knowingly made a false and fictitious written statement which was intended and likely to deceive the licensed dealer as to a fact material to the lawfulness of the acquisition of said firearm. Specifically, the defendant falsely represented on Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, in response to Question 21.a., that she was the actual transferee/buyer of the firearm listed on the form.

This is a violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

THE GRAND JURY FURTHER CHARGES:

COUNT 6
(False Statement During Purchase of a Firearm)

On or about June 3, 2022, in the Southern District of Iowa, the defendant, DEON ELLEASE COOPER, knowingly made a false statement and representation to JT Guns and Supply in Des Moines, Iowa, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of JT Guns and Supply in Des Moines, Iowa. Specifically, the defendant falsely represented on Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, in response to Question 21.a., that she was the actual transferee/buyer of the firearm listed on the form.

This is a violation of Title 18, United States Code, Section 924(a)(1)(A).

THE GRAND JURY FURTHER CHARGES:

COUNT 7
(Interference with Commerce Through Robbery)

On or about June 21, 2022, in the Southern District of Iowa, the defendant, AVONTAE LAMAR TUCKER, also known as “Tae Tae,” knowingly and unlawfully obstructed, delayed, and affected commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, through the commission of a robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendant unlawfully took and obtained property, consisting of U.S. currency and other property, from the Casey’s General Store located at 3121 Forest Avenue, Des Moines, Iowa, a business that affects interstate commerce, from the person and presence of an employee of that business, against their will, by means of actual or threatened force or violence.

This is a violation of Title 18, United States Code, Section 1951.

THE GRAND JURY FURTHER CHARGES:

COUNT 8

**(Possessing and Brandishing a Firearm in Furtherance
of a Crime of Violence)**

On or about June 21, 2022, in the Southern District of Iowa, the defendant, AVONTAE LAMAR TUCKER, also known as “Tae Tae,” knowingly possessed and brandished a firearm in furtherance of a crime of violence for which he may be prosecuted in a court of the United States, that is, interfering with commerce by robbery, as set forth in Count 7 of this Indictment.

This is a violation of Title 18, United States Code, Section 924(c)(1)(A)(i) and 924(c)(1)(A)(ii).

THE GRAND JURY FURTHER CHARGES:

COUNT 9
(Straw Purchasing Conspiracy)

On or about June 25, 2022, in the Southern District of Iowa, the defendants, DEON ELLEASE COOPER and SANTIZ CORTEZ LANGFORD JR., also known as “Tiz” and “Tizwick,” conspired with each other to knowingly purchase a firearm, namely: a Diamondback, model DB-15, 5.56 NATO-caliber pistol, with serial number DB2608951, in or otherwise affecting commerce for, on behalf of, or at the request or demand of SANTIZ CORTEZ LANGFORD JR., also known as “Tiz” and “Tizwick,” knowing or having reasonable cause to believe that SANTIZ CORTEZ LANGFORD JR., also known as “Tiz” and “Tizwick,” was an unlawful user of, or addicted to, a controlled substance.

This is a violation of Title 18, United States Code, Section 932(b)(1) and 932(c)(1).

THE GRAND JURY FURTHER CHARGES:

COUNT 10

(False Statement During Purchase of a Firearm)

On or about June 25, 2022, in the Southern District of Iowa, the defendant, DEON ELLEASE COOPER, in connection with the acquisition of a firearm, namely: a Diamondback, model DB-15, 5.56 NATO-caliber pistol, with serial number DB2608951, from JT Guns and Supply LLC in Des Moines, Iowa, a licensed dealer of firearms, knowingly made a false and fictitious written statement which was intended and likely to deceive the licensed dealer as to a fact material to the lawfulness of the acquisition of said firearm. Specifically, the defendant falsely represented on Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, in response to Question 21.a., that she was the actual transferee/buyer of the firearm listed on the form.

This is a violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

THE GRAND JURY FURTHER CHARGES:

COUNT 11
(False Statement During Purchase of a Firearm)

On or about June 25, 2022, in the Southern District of Iowa, the defendant, DEON ELLEASE COOPER, knowingly made a false statement and representation to JT Guns and Supply in Des Moines, Iowa, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of JT Guns and Supply in Des Moines, Iowa. Specifically, the defendant falsely represented on Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, in response to Question 21.a., that she was the actual transferee/buyer of the firearm listed on the form.

This is a violation of Title 18, United States Code, Section 924(a)(1)(A).

THE GRAND JURY FURTHER CHARGES:

COUNT 12
(Firearms Trafficking Conspiracy)

On a date unknown, but between July 21, 2022, and February 17, 2023, in the Southern District of Iowa, the defendant, MAJOK MAJOK, also known as “Jok” and “Magok Magok,” conspired with another person known to the grand jury to transfer a firearm, namely: a Glock, model 27, .40 caliber pistol, with serial number AGSP951, in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by MAJOK MAJOK, also known as “Jok” and “Magok Magok,” would constitute a felony; and conspired to receive said firearm, knowing or having reasonable cause to believe that MAJOK MAJOK’s, also known as “Jok” and “Magok Magok,” receipt of the firearm would constitute a felony.

This is a violation of Title 18, United States Code, Section 933(a)(1), 933(a)(2), 933(a)(3), and 933(b).

THE GRAND JURY FURTHER CHARGES:

COUNT 13
(Firearms Trafficking Conspiracy)

On a date unknown, but between July 22, 2022, and August 23, 2022, in the Southern District of Iowa, the defendant, SEMAJ JOHNSON, also known as “Maj” and “10mill,” conspired with another person known to the grand jury to transfer a firearm, namely: a Glock, model 29, ten-millimeter pistol, with serial number BXHT254, in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by SEMAJ JOHNSON, also known as “Maj” and “10mill,” would constitute a felony; and conspired to receive said firearm, knowing or having reasonable cause to believe that SEMAJ JOHNSON’s, also known as “Maj” and “10mill,” receipt of the firearm would constitute a felony.

This is a violation of Title 18, United States Code, Section 933(a)(1), 933(a)(2), 933(a)(3), and 933(b).

THE GRAND JURY FURTHER CHARGES:

COUNT 14

(Possession with Intent to Distribute a Controlled Substance)

On or about August 23, 2022, in the Southern District of Iowa, the defendant, SEMAJ JOHNSON, also known as, “Maj” and “10mill,” knowingly and intentionally possessed with the intent to distribute a controlled substance, namely: a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

This is a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

THE GRAND JURY FURTHER CHARGES:

COUNT 15

(Possession of a Firearm in Furtherance of Drug Trafficking Crime)

On or about August 23, 2022, in the Southern District of Iowa, the defendant, SEMAJ JOHNSON, also known as, “Maj” and “10mill,” knowingly possessed a firearm, namely: a loaded Glock, model 29, ten-millimeter pistol, with serial number BXHT254. The defendant possessed this firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, a violation of Title 21, United States Code, Section 846, as set forth in Count 2 of this Indictment; and a violation of Title 21, United States Code, Section 841(a)(1), as set forth in Count 14 of this Indictment.

This is a violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

THE GRAND JURY FURTHER CHARGES:

COUNT 16
(Unlawful User in Possession of a Firearm)

On or about August 23, 2022, in the Southern District of Iowa, the defendant, SEMAJ JOHNSON, also known as “Maj” and “10mill,” in and affecting commerce, knowingly possessed a firearm, namely: a loaded Glock, model 29, ten-millimeter pistol, with serial number BXHT254. At the time of the offense, the defendant knew he was an unlawful user of, or addicted to, a controlled substance.

This is a violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(8).

THE GRAND JURY FURTHER CHARGES:

COUNT 17
(Possession with Intent to Distribute a Controlled Substance)

On or about September 28, 2022, in the Southern District of Iowa, the defendant, AVONTAE LAMAR TUCKER, also known as “Tae Tae,” knowingly and intentionally possessed with the intent to distribute a controlled substance, namely: a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

This is a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

THE GRAND JURY FURTHER CHARGES:

COUNT 18

(Possession with Intent to Distribute a Controlled Substance)

On or about September 28, 2022, in the Southern District of Iowa, the defendant, AVONTAE LAMAR TUCKER, also known as “Tae Tae,” knowingly and intentionally possessed with the intent to distribute a controlled substance, namely: five grams or more of methamphetamine, a Schedule II controlled substance.

This is a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(B).

THE GRAND JURY FURTHER CHARGES:

COUNT 19

(Possession of a Firearm in Furtherance of Drug Trafficking Crime)

On or about September 28, 2022, in the Southern District of Iowa, the defendant, AVONTAE LAMAR TUCKER, also known as “Tae Tae,” knowingly possessed a firearm, namely: a loaded Glock, model 19, nine-millimeter pistol, with serial number BCVU827. The defendant possessed this firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, a violation of Title 21, United States Code, Section 846, as set forth in Counts 2 and 3 of this Indictment; and a violation of Title 21, United States Code, Section 841(a)(1), as set forth in Counts 17 and 18 of this Indictment.

This is a violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

THE GRAND JURY FURTHER CHARGES:

COUNT 20
(Straw Purchasing Conspiracy)

On or about October 22, 2022, in the Southern District of Iowa, the defendants, DAWN ELLEASE ROBINSON, also known as “Dawn Ellease Colbert,” and SANTIZ CORTEZ LANGFORD JR., also known as “Tiz” and “Tizwick,” conspired with each other to knowingly purchase a firearm, namely: a Ruger, model 5.7, 5.7x28-millimeter pistol, with serial number 643-70485; and a Glock, model G27, .40 caliber pistol, with serial number BYAF079, in or otherwise affecting commerce for, on behalf of, or at the request or demand of SANTIZ CORTEZ LANGFORD JR., also known as “Tiz” and “Tizwick,” knowing or having reasonable cause to believe that SANTIZ CORTEZ LANGFORD JR., also known as “Tiz” and “Tizwick,” was an unlawful user of, or addicted to, a controlled substance.

This is a violation of Title 18, United States Code, Section 932(b)(1) and 932(c)(1).

THE GRAND JURY FURTHER CHARGES:

COUNT 21

(False Statement During Purchase of a Firearm)

On or about October 22, 2022, in the Southern District of Iowa, the defendant, DAWN ELLEASE ROBINSON, also known as “Dawn Ellease Colbert,” in connection with the acquisition of a firearm, namely: a Ruger, model 5.7, 5.7x28-millimeter pistol, with serial number 643-70485; and a Glock, model G27, .40 caliber pistol, with serial number BYAF079, from JT Guns and Supply LLC in Des Moines, Iowa, a licensed dealer of firearms, knowingly made a false and fictitious written statement which was intended and likely to deceive the licensed dealer as to a fact material to the lawfulness of the acquisition of said firearm. Specifically, the defendant falsely represented on Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, in response to Question 21.a., that she was the actual transferee/buyer of the firearm listed on the form.

This is a violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

THE GRAND JURY FURTHER CHARGES:

COUNT 22
(False Statement During Purchase of a Firearm)

On or about October 22, 2022, in the Southern District of Iowa, the defendant, DAWN ELLEASE ROBINSON, also known as “Dawn Ellease Colbert,” knowingly made a false statement and representation to JT Guns and Supply in Des Moines, Iowa, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of JT Guns and Supply in Des Moines, Iowa. Specifically, the defendant falsely represented on Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, in response to Question 21.a., that she was the actual transferee/buyer of the firearm listed on the form.

This is a violation of Title 18, United States Code, Section 924(a)(1)(A).

THE GRAND JURY FURTHER CHARGES:

COUNT 23
(Firearms Trafficking Conspiracy)

On a date unknown, but between October 22, 2022, and January 23, 2023, in the Southern District of Iowa, the defendant, SANTIZ CORTEZ LANGFORD JR., also known as “Tiz” and “Tizwick,” conspired with an individual known to the Grand Jury to transfer a firearm, namely: a Ruger, model 5.7, 5.7x28-millimeter pistol, with serial number 643-70485, in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by this individual, a minor whose identity is known to the Grand Jury, would constitute a felony; and conspired to receive said firearm, knowing or having reasonable cause to believe that the minor’s receipt of the firearm would constitute a felony.

This is a violation of Title 18, United States Code, Section 933(a)(1), 933(a)(2), 933(a)(3), and 933(b).

THE GRAND JURY FURTHER CHARGES:

COUNT 24
(Straw Purchasing of a Firearm)

On or about October 29, 2022, in the Southern District of Iowa, the defendant, DEON ELLEASE COOPER, knowingly purchased a firearm, namely: a Glock, model 20 Gen 4, ten-millimeter pistol, with serial number BYGE189, in or otherwise affecting interstate or foreign commerce for, on behalf of, or at the request or demand of SANTIZ CORTEZ LANGFORD JR., also known as “Tiz” and “Tizwick,” knowing or having reasonable cause to believe that SANTIZ CORTEZ LANGFORD JR., also known as “Tiz” and “Tizwick,” was an unlawful user of, or addicted to, a controlled substance, or conspired to do so.

This is a violation of Title 18, United States Code, Section 932(b)(1) and 932(c)(1).

THE GRAND JURY FURTHER CHARGES:

COUNT 25

(False Statement During Purchase of a Firearm)

On or about October 29, 2022, in the Southern District of Iowa, the defendant, DEON ELLEASE COOPER, in connection with the acquisition of a firearm, namely: a Glock, model 20 Gen 4, ten-millimeter pistol, with serial number BYGE189, from Sportsman's Warehouse 120 in Ankeny, Iowa, a licensed dealer of firearms, knowingly made a false and fictitious written statement which was intended and likely to deceive the licensed dealer as to a fact material to the lawfulness of the acquisition of said firearm. Specifically, the defendant falsely represented on Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, in response to Question 21.a., that she was the actual transferee/buyer of the firearm listed on the form.

This is a violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

THE GRAND JURY FURTHER CHARGES:

COUNT 26
(False Statement During Purchase of a Firearm)

On or about October 29, 2022, in the Southern District of Iowa, the defendant, DEON ELLEASE COOPER, knowingly made a false statement and representation to Sportsman's Warehouse 120 in Ankeny, Iowa, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Sportsman's Warehouse 120 in Ankeny, Iowa. Specifically, the defendant falsely represented on Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, in response to Question 21.a., that she was the actual transferee/buyer of the firearm listed on the form.

This is a violation of Title 18, United States Code, Section 924(a)(1)(A).

THE GRAND JURY FURTHER CHARGES:

COUNT 27
(Firearms Trafficking)

On a date unknown, but between October 29, 2022, and February 10, 2023, in the Southern District of Iowa, the defendant, SANTIZ CORTEZ LANGFORD JR., also known as "Tiz" and "Tizwick," received a firearm, namely: a Glock, model 20 Gen 4, ten-millimeter pistol, with serial number BYGE189, knowing or having reasonable cause to believe that his receipt of the firearm would constitute a felony.

This is a violation of Title 18, United States Code, Section 933(a)(2) and 933(b).

THE GRAND JURY FURTHER CHARGES:

COUNT 28
(Straw Purchasing of a Firearm)

On or about January 3, 2023, in the Southern District of Iowa, the defendant, DAWN ELLEASE ROBINSON, also known as “Dawn Ellease Colbert,” knowingly purchased a firearm, namely: a Glock, model 20 Gen 4, ten-millimeter pistol, with serial number BXHG838, in or otherwise affecting interstate or foreign commerce for, on behalf of, or at the request or demand of SANTIZ CORTEZ LANGFORD JR., also known as “Tiz” and “Tizwick,” knowing or having reasonable cause to believe that SANTIZ CORTEZ LANGFORD JR., also known as “Tiz” and “Tizwick,” was an unlawful user of, or addicted to, a controlled substance, or conspired to do so.

This is a violation of Title 18, United States Code, Section 932(b)(1) and 932(c)(1).

THE GRAND JURY FURTHER CHARGES:

COUNT 29

(False Statement During Purchase of a Firearm)

On or about January 3, 2023, in the Southern District of Iowa, the defendant, DAWN ELLEASE ROBINSON, also known as “Dawn Ellease Colbert,” in connection with the acquisition of a firearm, namely: a Glock, model 20 Gen 4, ten-millimeter pistol, with serial number BXHG838, from Rangemaster Training Center in Clive, Iowa, a licensed dealer of firearms, knowingly made a false and fictitious written statement which was intended and likely to deceive the licensed dealer as to a fact material to the lawfulness of the acquisition of said firearm. Specifically, the defendant falsely represented on Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473: (1) in response to Question 21.a., that she was the actual transferee/buyer of the firearm listed on the form; and (2) in response to Question 21.e., that she was not an unlawful user of, or addicted to, any controlled substance, including marijuana.

This is a violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

THE GRAND JURY FURTHER CHARGES:

COUNT 30

(False Statement During Purchase of a Firearm)

On or about January 3, 2023, in the Southern District of Iowa, the defendant, DAWN ELLEASE ROBINSON, also known as “Dawn Ellease Colbert,” knowingly made a false statement and representation to Rangemaster Training Center in Clive, Iowa, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Rangemaster Training Center in Clive, Iowa. Specifically, the defendant falsely represented on Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473: (1) in response to Question 21.a., that she was the actual transferee/buyer of the firearm listed on the form; and (2) in response to Question 21.e., that she was not an unlawful user of, or addicted to, any controlled substance, including marijuana.

This is a violation of Title 18, United States Code, Section 924(a)(1)(A).

THE GRAND JURY FURTHER CHARGES:

COUNT 31
(Firearms Trafficking)

On a date unknown, but between January 3, 2023, and February 10, 2023, in the Southern District of Iowa, the defendant, SANTIZ CORTEZ LANGFORD JR., also known as “Tiz” and “Tizwick,” received a firearm, namely: a Glock, model 20 Gen 4, ten-millimeter pistol, with serial number BXHG838, knowing or having reasonable cause to believe that his receipt of the firearm would constitute a felony.

This is a violation of Title 18, United States Code, Section 933(a)(2) and 933(b).

THE GRAND JURY FURTHER CHARGES:

COUNT 32
(Distribution of a Controlled Substance)

On or about February 9, 2023, in the Southern District of Iowa, the defendant, DAHABA BAHARI LULA, also known as “Haba,” knowingly and intentionally distributed a controlled substance, namely: a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

This is a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

THE GRAND JURY FURTHER CHARGES:

COUNT 33
(Unlawful User in Possession of a Firearm)

On or about February 10, 2023, in the Southern District of Iowa, the defendant, DAWN ELLEASE ROBINSON, also known as “Dawn Ellease Colbert,” in and affecting commerce, knowingly possessed a firearm, namely, one or more of the following:

1. a loaded Smith and Wesson, model Bodyguard, .380 caliber pistol, with serial number KHX6781; and
2. a loaded Bersa, model Thunder, .380 caliber pistol, with serial number E48291.

At the time of the offense, the defendant knew she was an unlawful user of, or addicted to, a controlled substance.

This is a violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(8).

THE GRAND JURY FURTHER CHARGES:

COUNT 34
(Possession with Intent to Distribute a Controlled Substance)

On or about February 10, 2023, in the Southern District of Iowa, the defendant, SANTIZ CORTEZ LANGFORD JR., also known as “Tiz” and “Tizwick,” knowingly and intentionally possessed with the intent to distribute a controlled substance, namely: a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

This is a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(D).

THE GRAND JURY FURTHER CHARGES:

COUNT 35

(Possession of a Firearm in Furtherance of Drug Trafficking Crime)

On or about February 10, 2023, in the Southern District of Iowa, the defendant, SANTIZ CORTEZ LANGFORD JR., also known as “Tiz” and “Tizwick,” knowingly possessed a firearm, namely, one or more of the following firearms:

1. a machinegun, namely: an automatic selector switch, affixed to a loaded Glock, model 29, ten-millimeter pistol, with serial number BDGC181;
2. a loaded Glock, model 20 Gen 4, ten-millimeter pistol, with serial number BXHG838; and
3. a loaded Glock, model 20 Gen 4, ten-millimeter pistol, with serial number BYGE189.

The defendant possessed one or more of these firearms in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, violation of Title 21, United States Code, section 846, as set forth in Counts 2 and 3 of this Indictment; and violations of Title 21, United States Code, Section 841(a)(1), as set forth in Count 34 of this Indictment.

This is a violation of Title 18, United States Code, Section 924(c)(1)(A)(i) and 924(c)(1)(B)(ii).

THE GRAND JURY FURTHER CHARGES:

COUNT 36
(Unlawful User in Possession of a Firearm)

On or about February 10, 2023, in the Southern District of Iowa, the defendant, SANTIZ CORTEZ LANGFORD JR., also known as “Tiz” and “Tizwick,” in and affecting commerce, knowingly possessed a firearm, namely, one or more of the following:

1. a machinegun, namely: an automatic selector switch, affixed to a loaded Glock, model 29, ten-millimeter pistol, with serial number BDGC181;
2. a loaded Glock, model 20 Gen 4, ten-millimeter pistol, with serial number BXHG838; and
3. a loaded Glock, model 20 Gen 4, ten-millimeter pistol, with serial number BYGE189.

At the time of the offense, the defendant knew he was an unlawful user of, or addicted to, a controlled substance.

This is a violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(8).

THE GRAND JURY FURTHER CHARGES:

COUNT 37
(Illegal Possession of a Machinegun)

On or about February 10, 2023, in the Southern District of Iowa, the defendant, SANTIZ CORTEZ LANGFORD JR., also known as “Tiz” and “Tizwick,” in and affecting commerce, knowingly possessed a machinegun, namely: an automatic selector switch, affixed to a loaded Glock, model 29, ten-millimeter pistol, with serial number BDGC181, when recovered.

This is a violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

THE GRAND JURY FURTHER CHARGES:

COUNT 38
(Possession of a Machinegun in Furtherance of Drug Trafficking Crime)

On or about February 17, 2023, in the Southern District of Iowa, the defendant, MAJOK MAJOK, also known as “Jok” and “Magok Magok,” knowingly possessed a machinegun and firearm, namely: a loaded Glock, model 27, .40 caliber pistol, with serial number AGSP951, which had affixed to it upon recovery, an automatic selector switch, which is a machinegun. The defendant possessed this firearm and machinegun in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, violations of Title 21, United States Code, Section 846, as set forth in Counts 2 and 3 of this Indictment.

This is a violation of Title 18, United States Code, Section 924(c)(1)(A)(i) and 924(c)(1)(B)(ii).

THE GRAND JURY FURTHER CHARGES:

COUNT 39
(Unlawful User in Possession of a Firearm)

On or about February 17, 2023, in the Southern District of Iowa, the defendant, MAJOK MAJOK, also known as “Jok” and “Magok Magok,” in and affecting commerce, knowingly possessed a firearm, namely: a loaded Glock, model 27, .40 caliber pistol, with serial number AGSP951. At the time of the offense, the defendant knew he was an unlawful user of, or addicted to, a controlled substance.

This is a violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(8).

THE GRAND JURY FURTHER CHARGES:

COUNT 40
(Illegal Possession of a Machinegun)

On or about February 17, 2023, in the Southern District of Iowa, the defendant, MAJOK MAJOK, also known as “Jok” and “Magok Magok,” in and affecting commerce, knowingly possessed a machinegun, namely: an automatic selector switch, affixed to a loaded Glock, model 27, .40 caliber pistol, with serial number AGSP951, when recovered.

This is a violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

THE GRAND JURY FURTHER CHARGES:

COUNT 41
(Distribution of a Controlled Substance)

On or about March 8, 2023, in the Southern District of Iowa, the defendant, DAHABA BAHARI LULA, also known as “Haba,” knowingly and intentionally distributed a controlled substance, namely: a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

This is a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

THE GRAND JURY FURTHER CHARGES:

COUNT 42
(Distribution of a Controlled Substance)

On or about March 22, 2023, in the Southern District of Iowa, the defendant, MAJOK MAJOK, also known as “Jok” and “Magok Magok,” knowingly and intentionally distributed a controlled substance, namely: a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

This is a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

THE GRAND JURY FURTHER CHARGES:

COUNT 43
(Distribution of a Controlled Substance)

On or about April 18, 2023, in the Southern District of Iowa, the defendant, DAHABA BAHARI LULA, also known as “Haba,” knowingly and intentionally distributed a controlled substance, namely: a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

This is a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

THE GRAND JURY FURTHER CHARGES:

COUNT 44
(Unlawful User in Possession of a Firearm)

On or about April 18, 2023, in the Southern District of Iowa, the defendant, SANTIZ CORTEZ LANGFORD JR., also known as “Tiz” and “Tizwick,” in and affecting commerce, knowingly possessed a firearm, namely: a loaded Glock, model 32, .357 caliber pistol, with serial number DRF572US. At the time of the offense, the defendant knew he was an unlawful user of, or addicted to, a controlled substance.

This is a violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(8).

THE GRAND JURY FURTHER CHARGES:

COUNT 45
(Distribution of a Controlled Substance)

On or about April 26, 2023, in the Southern District of Iowa, the defendant, MAJOK MAJOK, also known as “Jok” and “Magok Magok,” knowingly and intentionally distributed a controlled substance, namely: a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

This is a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

THE GRAND JURY FURTHER CHARGES:

COUNT 46
(Distribution of a Controlled Substance)

On or about May 18, 2023, in the Southern District of Iowa, the defendant, MAJOK MAJOK, also known as “Jok” and “Magok Magok,” knowingly and intentionally distributed a controlled substance, namely: a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

This is a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

THE GRAND JURY FURTHER CHARGES:

COUNT 47

(Distribution of a Controlled Substance)

On or about June 22, 2023, in the Southern District of Iowa, the defendant, MAJOK MAJOK, also known as “Jok” and “Magok Magok,” knowingly and intentionally distributed a controlled substance, namely: a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

This is a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

THE GRAND JURY FURTHER CHARGES:

COUNT 48

(Distribution of a Controlled Substance)

On or about July 11, 2023, at 1431 22nd Street in West Des Moines, Iowa, in the Southern District of Iowa, the defendant, DAHABA BAHARI LULA, also known as “Haba,” knowingly and intentionally distributed a controlled substance, namely: a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

This is a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

THE GRAND JURY FURTHER CHARGES:

COUNT 49
(Distribution of a Controlled Substance)

On or about July 11, 2023, at 1451 22nd Street in West Des Moines, Iowa, in the Southern District of Iowa, the defendant, DAHABA BAHARI LULA, also known as “Haba,” knowingly and intentionally distributed a controlled substance, namely: a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

This is a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

THE GRAND JURY FURTHER CHARGES:

COUNT 50
(Unlawful User in Possession of a Firearm)

On or about July 20, 2023, in the Southern District of Iowa, the defendant, DAWN ELLEASE ROBINSON, also known as “Dawn Ellease Colbert,” in and affecting commerce, knowingly possessed a firearm, namely, one or more of the following:

1. a SCT MFG LLC, nine-millimeter pistol, with serial number AAA0005944; and
2. a loaded Colt, model Sporter HB, .223 caliber rifle, with serial number CH017492.

At the time of the offense, the defendant knew she was an unlawful user of, or addicted to, a controlled substance.

This is a violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(8).

THE GRAND JURY FURTHER CHARGES:

COUNT 51

(Unlawful User in Possession of a Firearm)

On or about July 20, 2023, in the Southern District of Iowa, the defendant, SANTIZ CORTEZ LANGFORD JR., also known as “Tiz” and “Tizwick,” in and affecting commerce, knowingly possessed a firearm, namely: a loaded Colt, model Sporter HB, .223 caliber rifle, with serial number CH017492. At the time of the offense, the defendant knew he was an unlawful user of, or addicted to, a controlled substance.

This is a violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(8).

THE GRAND JURY FINDS:

NOTICE OF FORFEITURE

That upon conviction of the offense set forth in Counts 2, 3, 14, 17, 18, 32, 34, 41, 42, 43, 45, 46, 47, 48, and/or 49 of this Indictment, the defendants, MAJOK MAJOK, also known as “Jok” and “Magok Magok,” SANTIZ CORTEZ LANGFORD JR., also known as “Tiz” and “Tizwick,” SEMAJ JOHNSON, also known as “Maj” and “10mill,” AVONTAE LAMAR TUCKER, also known as “Tae Tae,” and DAHABA BAHARI LULA, also known as “Haba,” shall forfeit, to the United States, the following:

- A. **Proceeds.** Any and all property constituting, and derived from, any proceeds such defendant obtained, directly or indirectly, and as a result of such violation, and
- B. **Facilitation.** Any property used and intended to be used in any manner, or part, to commit or to facilitate the commission of such violation.

The property to be forfeited includes, but is not limited to:

1. Glock, model 27, .40 caliber pistol, with serial number AGSP951; ammunition; magazines; and affixed automatic selector switch;
2. Smith and Wesson, model Bodyguard, .380 caliber pistol, with serial number KHX6781; ammunition; magazines; firearm parts;
3. Bersa, model Thunder, .380 caliber pistol, with serial number E48291; ammunition; magazines; firearm parts;
4. Glock, model 32, .357 caliber pistol, with serial number DRF572US; ammunition; magazines; firearm parts;
5. Approximately \$1,600 in U.S. currency, seized from the residence at 3408 Dubuque Avenue, Des Moines, Iowa, on August 23, 2022;

6. Approximately \$1,248 in U.S. currency, seized from the residence at 1239 23rd Street, Des Moines, Iowa, on February 10, 2023; and
7. Approximately \$200 in U.S. currency, seized from the residence at 1239/1241 23rd Street, Des Moines, Iowa, on July 20, 2023.

This is pursuant to Title 21, United States Code, Section 853, and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

THE GRAND JURY FURTHER FINDS:

NOTICE OF FORFEITURE

Upon conviction for the offense(s) alleged in Counts 38, 39, and/or 40 of this Indictment, the defendant, MAJOK MAJOK, also known as “Jok” and “Magok Magok,” shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d), Title 26, United States Code, Section 5872, and Title 28, United States Code, Section 2461(c), all firearms, firearm parts, magazines, and ammunition involved in the commission of said offenses, including, but not limited to, the firearms, firearm parts, and ammunition identified in Counts 38, 39, and 40 of this Indictment.

This is pursuant to Title 18, United States Code, Section 924(d), Title 26, United States Code, Section 5872, and Title 28, United States Code, Section 2461(c).

THE GRAND JURY FURTHER FINDS:

NOTICE OF FORFEITURE

Upon conviction for the offense alleged in Count 12 of this Indictment, the defendant, MAJOK MAJOK, also known as “Jok” and “Magok Magok,” shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 924(d) and 934 and Title 28, United States Code, Section 2461(c), all firearms, magazines, and ammunition involved in the commission of said offenses, including, but not limited to, the firearms and ammunition identified in Count 12 of this Indictment.

This is pursuant to Title 18, United States Code, Sections 924(d) and 934, and Title 28, United States Code, Section 2461©.

THE GRAND JURY FURTHER FINDS:

NOTICE OF FORFEITURE

Upon conviction for the offense alleged in Count 33 of this Indictment, the defendant, DAWN ELLEASE ROBINSON, also known as "Dawn Ellease Colbert," shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), all firearms, magazines, and ammunition involved in the commission of said offense, including, but not limited to, the firearm and ammunition identified in Count 33 of this Indictment.

This is pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

A TRUE BILL.

FOREPERSON

Richard D. Westphal
United States Attorney

By:

KMHerrera
Kristin M. Herrera
Mallory E. Weiser
Assistant United States Attorneys