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UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

JUL 18 2023

Clerk, U.S. District and Bankruptcy Courts

Holding a Criminal Term

Grand Jury Sworn in March 16, 2023

UNITED STATES OF AMERICA : CRIMINAL NO.

v. : VIOLATIONS:

DAEYON ROSS, : 18 U.S.C. § 922(g)(1)

: (Unlawful Possession of a Firearm and Defendant. : Ammunition by a Person Convicted of a : Crime Punishable by Imprisonment for a

Term Exceeding One Year)

: 18 U.S.C. § 2119(1) : (Carjacking)

18 U.S.C. § 924(c)(1)(A)(iii)

(Using, Carrying, Possessing, and

: Discharging a Firearm During a Crime of

Violence)

18 D.C. Code §§ 401, 4502

(Assault With Intent to Kill While Armed)

: 18 D.C. Code § 402

(Assault with a Dangerous Weapon)

22 D.C. Code §§ 405(c), 4502

: (Assault on a Police Officer (Felony) While

Armed)

: FORFEITURE: 18 U.S.C. § 924(d),

21 U.S.C. § 853(p) and 28 U.S.C. § 2461(c)

INDICTMENT

The Grand Jury Charges that:

COUNT ONE

On or about July 2, 2023, within the District of Columbia, **DAEYON ROSS**, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, in the Superior Court for the District of Columbia, Criminal Case Nos. 2017 CF3 19988 and 2017 CF3 11265, did unlawfully and knowingly receive and possess a firearm, namely, a Glock 19 M Gen 5 semi-automatic pistol, and did unlawfully and knowingly receive and possess ammunition, that is, 9 millimeter ammunition, which had been possessed, shipped and transported in and affecting interstate and foreign commerce.

(Unlawful Possession of a Firearm and Ammunition by a Person a Crime Punishable by Imprisonment for a Term Exceeding One Year, in violation of Title 18, United States Code, Section 922(g)(1))

COUNT TWO

On or about July 2, 2023, within the District of Columbia, **DAEYON ROSS**, took a motor vehicle, to wit: a 2019 GMC Terrain, that had been transported, shipped, or received in interstate commerce, from the person or presence of M.D., by force, violence, and intimidation, with the intent to cause death or serious bodily harm.

(Carjacking, in violation of Title 18, United States Code, Section 2119(1))

COUNT THREE

On or about July 2, 2023, the defendant, **DAEYON ROSS**, within the District of Columbia, did unlawfully and knowingly use, carry, possess, and discharge during and in relation to, and possess in furtherance of, a crime of violence, for which he may be prosecuted in a court of the United States, that is, Count Two of this Indictment, which is incorporated herein, a firearm, namely, a Glock 19 M Gen 5 semi-automatic pistol.

(Using, Carrying, Possessing, and Discharging a Firearm During and in Relation to a Crime of Violence or a Drug Trafficking Offense, in violation of Title 18, United States Code, Section 924(c)(1)(A)(iii))

COUNT FOUR

On or about July 2, 2023, the defendant, **DAEYON ROSS**, within the District of Columbia, while armed with a Glock 19 M Gen 5 semi-automatic pistol, assaulted Corporal J.S. of the Prince George's County Police Department, with intent to kill.

(Assault With Intent to Kill While Armed, in violation of Title 22, District of Columbia Code, Sections 401, 4502 (2001 ed.))

COUNT FIVE

On or about July 2, 2023, the defendant, **DAEYON ROSS**, assaulted Corporal J.S. of the Prince George's County Police Department with a dangerous weapon, that is a Glock 19 M Gen 5 semi-automatic pistol.

(Assault With a Dangerous Weapon, in violation of Title 22, District of Columbia Code, Section 402 (2001 ed.))

COUNT SIX

On or about July 2, 2023, the defendant, **DAEYON ROSS**, while armed with and having readily available a Glock 19 M Gen 5 semi-automatic pistol, without justifiable and excusable cause, did assault Corporal J.S. of the Prince George's County Police Department, a law enforcement officer operating in the District of Columbia, knowing Corporal J.S. to be a law enforcement officer, while Corporal J.S. was engaged in and on account of the performance of his official duties, and **DAEYON ROSS**, while armed with and having readily available a Glock 19 M Gen 5 semi-automatic pistol, committed a violent act that created a grave risk of significant bodily injury to Corporal J.S.

(Assault on a Law Enforcement Officer (Felony) While Armed in violation of Title 22, District of Columbia Code, Sections 405(c), 4502 (2001 ed.))

FORFEITURE NOTICE

1. Upon conviction of the offenses alleged in Counts One through Six of this

Indictment, the defendant 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), any firearms and

ammunition involved in or used in the knowing commission of these offenses, including but not

limited to a Glock 19 M Gen 5 semi-automatic pistol, and 9mm ammunition.

2. If any of the property described above as being subject to forfeiture, 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 or 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 that cannot be subdivided without difficulty;

the defendant shall forfeit to the United States any other property of the defendant, up to the value

of the property described above, pursuant to Title 21, United States Code, Section 853(p), as

incorporated by Title 28, United States Code, Section 2461(c).

(Criminal Forfeiture, pursuant to Title 18, United States Code, Section 924(d), Title 21, United

States Code, Section 853(p), and Title 28, United States Code, Section 2461(c))

A TRUE BILL

FOREPERSON

Matthew M. Drave Joseph

MATTHEW M. GRAVES
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