

24cr163 JWB/JFD

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,	)	<b>INDICTMENT</b>
	)	
Plaintiff,	)	18 U.S.C. § 922(g)(1)
	)	18 U.S.C. § 924(a)(8)
v.	)	18 U.S.C. § 924(d)(1)
	)	21 U.S.C. § 841(a)(1)
JAQUAN LAVELLE JACKSON,	)	21 U.S.C. § 841(b)(1)(C)
a/k/a "Bull,"	)	21 U.S.C. § 853(p)
	)	21 U.S.C. § 924(c)(1)(A)(i)
Defendant.	)	26 U.S.C. § 5845(b)
	)	28 U.S.C. § 2461(c)

THE UNITED STATES GRAND JURY CHARGES THAT:

At times relevant to this Indictment:

The Defendant was a member and associate of a criminal organization, namely, the South Minneapolis street gang known as the "10's" (often stylized as "10z"). At times relevant to this Indictment, the 10's operated in the District of Minnesota, and elsewhere.

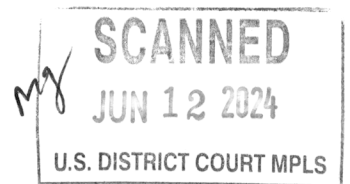
**COUNT 1**

(Felon in Possession of Firearm)

On or about December 5, 2023, in the State and District of Minnesota, the defendant,

**JAQUAN LAVELLE JACKSON,**  
a/k/a "Bull,"

having previously been convicted of the following crimes, each of which was punishable by imprisonment for a term exceeding one year:



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<b>Offense</b>	<b>Place of Conviction</b>	<b>Date of Conviction (On or About)</b>
Felon in Possession of a Firearm	Hennepin County, MN	Feb. 8, 2022
Fifth Degree Controlled Substance Possession	Hennepin County, MN	June 12, 2019
Theft of a Motor Vehicle	Hennepin County, MN	Nov. 17, 2017

and knowing he had been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, that is, a GSG model Firefly .22 caliber semi-automatic pistol with an obliterated serial number; all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

**COUNT 2**

(Possession with Intent to Distribute Cocaine)

On or about December 5, 2023, in the State and District of Minnesota, the defendant,

**JAQUAN LAVELLE JACKSON,**  
a/k/a “Bull,”

did knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of cocaine, a controlled substance; all in violation of Title 21, United States Code, Sections 841(a)(1), and 841(b)(1)(C).

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**COUNT 3**

(Carrying a Firearm During and in Relation to a Drug Trafficking Crime)

On or about December 5, 2023, in the State and District of Minnesota,  
the defendant,

**JAQUAN LAVELLE JACKSON,**  
a/k/a “Bull,”

did knowingly use and carry a firearm, that is, a GSG model Firefly .22 caliber semi-automatic pistol with an obliterated serial number, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute cocaine, as alleged in Count 2 of this Indictment, all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

**FORFEITURE ALLEGATION**

Count 1 of this Indictment is hereby realleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

As a result of the offenses alleged in Count 1 of this Indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any firearms, accessories (including any magazines, switches, conversion devices,

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auto sears, and other firearms parts), and ammunition, involved in, connected with, or used in any knowing violation of, the offenses alleged, including, but not limited to, a GSG model Firefly .22 caliber semi-automatic pistol with an obliterated serial number and .22 caliber ammunition

As a result of the offenses alleged in Counts 2 and 3 of this Indictment, the defendant shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said violation, including but not limited to, a GSG model Firefly .22 caliber semi-automatic pistol with an obliterated serial number and .22 caliber ammunition. If any of the above-described property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p).

All in violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(8), and 924(d)(1), Title 26, United States Code, Section 5845(b), and Title 28, United States Code, Section 2461(c).

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A TRUE BILL

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UNITED STATES ATTORNEY

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FOREPERSON