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By Anthony Sodono at 8:18 pm, May 05, 2021

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon. Madeline Cox Arleo
	:	
	:	Crim No. 21- 381 (MCA)
v.	:	
	:	18 U.S.C. § 922(g)(1)
	:	21 U.S.C. §§ 841(a)(1) and (b)(1)(C)
NAIEM MOORE	:	18 U.S.C. § 924(c)(1)(A)(i)

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark, charges:

COUNT ONE

(Possession of a Firearm and Ammunition by a Convicted Felon)

On or about January 14, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

NAIEM MOORE,

knowing that he had previously been convicted in a court of at least one crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting commerce a firearm and ammunition, namely, a loaded chrome Llama Max-I 45C/F, bearing serial number 07-04-02655-99, four (4) rounds of .45 caliber ammunition, and two (2) rounds of .45 caliber controlled expansion ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWO

(Possession with Intent to Distribute Controlled Substances)

On or about January 14, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

NAIEM MOORE,

did knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, and a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

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

COUNT THREE

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

On or about January 14, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

NAIEM MOORE,

in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the possession with intent to distribute cocaine base and heroin charged in Count Two of this Indictment, did knowingly possess a firearm, namely a chrome Llama Max-I 45C/F firearm, bearing serial number 07-04-02655-99.

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

COUNT FOUR

(Possession of a Firearm and Ammunition by a Convicted Felon)

On or about September 28, 2020, in Essex County, in the District of New Jersey and elsewhere, the defendant,

NAIEM MOORE,

knowing that he had previously been convicted in a court of at least one crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting commerce a firearm and ammunition, namely, a loaded chrome Llama Max-I 45C/F, bearing serial number 07-04-02655-99, and three (3) rounds of .45 caliber ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION AS TO COUNTS ONE, THREE, AND FOUR

As a result of committing the firearms offenses charged in Counts One, Three, and Four of this Indictment, the defendant,

NAIEM MOORE,

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 firearm and ammunition involved in or used in the commission of such offenses, including, but not limited to, one chrome Llama Max-I 45C/F firearm, bearing serial number 07-04-02655-99, seven (7) rounds of .45 caliber ammunition, and two (2) rounds of .45 caliber controlled expansion ammunition.

FORFEITURE ALLEGATION AS TO COUNT TWO

As a result of committing the controlled substance offense charged in Count Two of this Indictment, the defendant,

NAIEM MOORE,

shall forfeit to the United States of America, pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds obtained directly or indirectly as a result of the said offense, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offense alleged in Count Two of this Indictment.


Substitute Assets Provision
(Applicable to All Forfeiture Allegations)

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

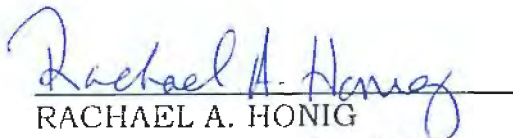
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be 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 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

A TRUE BILL



FOREPERSON


RACHAEL A. HONIG
Acting United States Attorney

CASE NUMBER: 21- 381 (MCA)

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

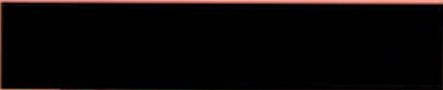
v.

NAIEM MOORE

INDICTMENT FOR

18 U.S.C. § 922(g)(1)
21 U.S.C. §§ 841(a)(1) and (b)(1)(C)
18 U.S.C. § 924(c)(1)(A)(i)

A True Bill,


Foreperson

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NEWARK, NEW JERSEY

DENAE M. THOMAS
ASSISTANT U.S. ATTORNEY
(973) 432-9560
