



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

September 2019 Grand Jury

<p>UNITED STATES OF AMERICA,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>TREVAUGN DESEAN MOORE, aka "Trevaugh Desean Moore," DIAMOND LUCIOUS, and CHRISTOPHER LAMAR HOLMES,</p> <p style="text-align: center;">Defendants.</p>	<p>5:20CR00132-JGB</p> <p style="text-align: center;"><u>I N D I C T M E N T</u></p> <p>[18 U.S.C. § 922(g)(1): Felon in Possession of a Firearm and Ammunition; 18 U.S.C. § 924(d)(1), 28 U.S.C. § 2461(c): Criminal Forfeiture]</p>
---	---

5:20CR00132-JGB

I N D I C T M E N T

[18 U.S.C. § 922(g)(1): Felon in Possession of a Firearm and Ammunition; 18 U.S.C. § 924(d)(1), 28 U.S.C. § 2461(c): Criminal Forfeiture]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 922(g)(1)]

[DEFENDANT MOORE]

On or about April 4, 2020, in San Bernardino County, within the Central District of California, defendant TREVAUGN DESEAN MOORE, also known as "Trevaugh Desean Moore," knowingly possessed ammunition, namely, five rounds of Hornady 9mm ammunition, in and affecting interstate and foreign commerce.

1 Defendant MOORE possessed such ammunition knowing that he had
2 previously been convicted of at least one of the following felony
3 crimes, each punishable by a term of imprisonment exceeding one year:

4 1. Assault by Means Likely to Produce Great Bodily Injury, in
5 violation of California Penal Code Section 245(a)(4), in the Superior
6 Court of the State of California, County of San Bernardino, case
7 number FSB1201753, on or about September 14, 2012; and

8 2. Felon in Possession of a Firearm, in violation of
9 California Penal Code Section 29800(a)(1), in the Superior Court of
10 the State of California, County of San Bernardino, case number
11 FSB1405308, on or about January 30, 2015.

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT TWO

[18 U.S.C. § 922(g)(1)]

[DEFENDANT LUCIOUS]

On or about April 4, 2020, in San Bernardino County, within the Central District of California, defendant DIAMOND LUCIOUS knowingly possessed the following firearm and ammunition, in and affecting interstate and foreign commerce:

1. An unknown make AR-15 pattern, 5.56mm caliber pistol, bearing no serial number or other markings identifying the firearm's manufacturer (commonly referred to as a "ghost gun");
2. Eight rounds of Lake City 5.56mm ammunition; and
3. Twenty rounds of Winchester 5.56mm ammunition.

Defendant LUCIOUS possessed such firearm and ammunition knowing that he had previously been convicted of a felony crime punishable by a term of imprisonment exceeding one year, namely, Carjacking, in violation of California Penal Code Section 215(a), in the Superior Court of the State of California, County of San Bernardino, case number FSB17003530, on or about September 25, 2017.

COUNT THREE

[18 U.S.C. § 922(g)(1)]

[DEFENDANT HOLMES]

On or about April 4, 2020, in San Bernardino County, within the Central District of California, defendant CHRISTOPHER LAMAR HOLMES knowingly possessed the following firearm and ammunition, in and affecting interstate and foreign commerce:

1. An unknown make AR-15 pattern, 5.56mm caliber pistol, bearing no serial number or other markings identifying the firearm's manufacturer (commonly referred to as a "ghost gun");

2. Eight rounds of Lake City 5.56mm ammunition; and

3. Twenty rounds of Winchester 5.56mm ammunition.

Defendant HOLMES possessed such firearm and ammunition knowing that he had previously been convicted of at least one of the following felony crimes, each punishable by a term of imprisonment exceeding one year:

1. First Degree Burglary, in violation of California Penal Code Section 459, in the Superior Court of the State of California, County of San Bernardino, case number FVA1001155, on or about September 30, 2010;

2. Grand Theft from Person, in violation of California Penal Code Section 487(f), in the Superior Court of the State of California, County of San Bernardino, case number FSB905031, on or about October 29, 2010;

3. Attempted Possession of Ammunition by a Prohibited Person, in violation of California Penal Code Sections 30305(a)(1) and 664, in the Superior Court of the State of California, County of San Bernardino, case number FSB1404583, on or about October 10, 2014; and

1 4. Felon in Possession of a Firearm, in violation of
2 California Penal Code Section 29800(a)(1), in the Superior Court of
3 the State of California, County of San Bernardino, case number
4 FWV17001866, on or about August 11, 2017.

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

FORFEITURE ALLEGATION

[18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c)]

1
2
3 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States of America
5 will seek forfeiture as part of any sentence, pursuant to Title 18,
6 United States Code, Section 924(d)(1), and Title 28, United States
7 Code, Section 2461(c), in the event of the defendants' conviction of
8 any offense set forth in this Indictment.

9 2. Defendants, if so convicted, shall forfeit to the United
10 States of America the following:

11 (a) All right, title, and interest in any firearm or
12 ammunition involved in or used in any such offense; and

13 (b) To the extent such property is not available for
14 forfeiture, a sum of money equal to the total value of the property
15 described in subparagraph (a).

16 3. Pursuant to Title 21, United States Code, Section 853(p),
17 as incorporated by Title 28, United States Code, Section 2461(c), the
18 defendant, if so convicted, shall forfeit substitute property, up to
19 the value of the property described in the preceding paragraph if, as
20 the result of any act or omission of the defendant, the property
21 described in the preceding paragraph or any portion thereof (a)
22 cannot be located upon the exercise of due diligence; (b) has been
23 transferred, sold to, or deposited with a third party; (c) has been

24 ///

25 ///

26
27
28

1 placed beyond the jurisdiction of the court; (d) has been
2 substantially diminished in value; or (e) has been commingled with
3 other property that cannot be divided without difficulty.

4 A TRUE BILL

5
6 151
7 Foreperson

8 NICOLA T. HANNA
9 United States Attorney

10 *Brandon Fox*

11 BRANDON D. FOX
12 Assistant United States Attorney
13 Chief, Criminal Division

14 JOSEPH B. WIDMAN
15 Assistant United States Attorney
16 Chief, Riverside Branch Office

17 JOHN A. BALLA
18 Assistant United States Attorney
19 Riverside Branch Office
20
21
22
23
24
25
26
27
28