

IN THE DISTRICT COURT OF THE UNITED STATES

for the Western District of New York

**MAY 2013 GRAND JURY
(Impaneled 05/03/13)**

THE UNITED STATES OF AMERICA

INDICTMENT

-vs-

ALLEN YOUNG

Violations:

Title 18, United States Code,
Section 922(g)(1);
Title 21, United States Code,
Sections 841(a)(1) and 846
(4 Counts and Forfeiture Allegation)

COUNT 1

(Conspiracy to Possess with Intent to Distribute, and to Distribute, Methylone)

The Grand Jury Charges That:

Between no later than on or about December 1, 2012, the exact date being unknown to the Grand Jury, and on or about February 14, 2013, in the Western District of New York, and elsewhere, the defendant, **ALLEN YOUNG**, did knowingly, willfully and unlawfully combine, conspire and agree with others, known and unknown to the Grand Jury, to commit the following offenses, that is, to possess with intent to distribute, and to distribute, a mixture and substance containing 3,4-methylenedioxy-N-methylcathinone (methylone), a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

All in violation of Title 21, United States Code, Section 846.

COUNT 2

(Possession with Intent to Distribute Methylone)

The Grand Jury Further Charges That:

On or about December 13, 2012, in the Western District of New York, the defendant, **ALLEN YOUNG**, did knowingly, intentionally and unlawfully possess with intent to distribute a quantity of 3,4-methylenedioxy-N-methylcathinone (methylone), a Schedule I controlled substance.

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

COUNT 3

(Possession with Intent to Distribute Marijuana)

The Grand Jury Further Charges That:

On or about December 13, 2012, in the Western District of New York, the defendant, **ALLEN YOUNG**, did knowingly, intentionally and unlawfully possess with intent to distribute a quantity of marijuana, a Schedule I controlled substance.

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

COUNT 4

(Felon in Possession of Firearms and Ammunition)

The Grand Jury Further Charges That:

Between on or about January 1, 2011, and on or about April 5, 2013, the exact dates being unknown to the Grand Jury, in the Western District of New York and elsewhere, the

defendant, **ALLEN YOUNG**, having been convicted on or about November 30, 2009, in County Court, Orleans County, New York, of a crime punishable by imprisonment for a term exceeding one year, unlawfully did knowingly possess, in and affecting commerce, firearms, namely, a Hi-Point 9 mm rifle, model 995 carbine, bearing serial number A83251; a Bushmaster, .223 caliber, Carbon 15 rifle, bearing serial number CRB027953; a Core 15, 5.56 mm rifle, bearing serial number GTOC000067; an AR-7 Industries, .22 caliber AR-7 Explorer rifle, bearing serial number D007884; a New England Firearms, 12 gauge, Pardner shotgun, bearing serial number NK252270; a Savage Arms, 20 gauge, Stevens Model 94 shotgun, bearing serial number C787964; and a Baikal, .410 caliber shotgun, bearing serial number 11053273; and ammunition, namely, 9 rounds of 12.7 x 99mm (.50 caliber) CBC (Companhia Brasileira de Cartuchos) ammunition.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

FORFEITURE ALLEGATION

The Grand Jury Alleges That:

Upon his conviction under Counts 1, 2, 3, or 4 of this Indictment, the defendant, ALLEN YOUNG, shall forfeit his right, title and interest to the United States of any firearms and ammunition involved or used in the commission of the offense, or found in the possession or under his immediate control at the time of arrest, including, but not limited to:

- a. One .22 caliber, AR-7 Explorer rifle, bearing serial number D007884;
- b. One Highpoint 9mm rifle, Model 995, bearing serial number A83251;
- c. One Baikal, .410 shotgun, bearing serial number 11053273;
- d. One New England Firearms, 12 gauge, Pardner shotgun, bearing serial number NK252270;
- e. One Savage Arms, 20 gauge, Stevens Model 94 shotgun, bearing serial number C787964;

- f. One Bushmaster AR-15, .223 caliber rifle, bearing serial number CRB027953;
- g. Good Time Outdoors, Inc. (GTO), Core 15, 5.56mm rifle, bearing serial number GTOC000067;
- h. 9 rounds of 12.7 x 99mm (.50 caliber) CBC ammunition;
- i. 67 rounds of 9 mm ammunition; and
- j. 76 rounds of .223 caliber ammunition.

All pursuant to the provisions of Title 18, United States Code, Sections 924(d) and 3665, and Title 28, United States Code, Section 2461(c).

DATED: Buffalo, New York, August 29, 2013.

WILLIAM J. HOCHUL, JR.
United States Attorney

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A TRUE BILL:

S/FOREPERSON
FOREPERSON