

IN THE SUPERIOR COURT OF THE STATE OF DELAWARE

THE STATE OF DELAWARE

: ID NO 2201010172 (D. EPIEWANE)  
: 2112007478 (N. GOICURIA)  
: 2204013950 (K. JACKSON) **Rule 9 Warrant**  
: 2204013882 (J. LASSITER) **Rule 9 Warrant**  
: 2201010176 (J. LASSITER)  
: 2203007365 (N. PEACE)  
: 2204013861 (J. SPENCER) **Rule 9 Warrant**  
: 2203007223 (J. SPENCER)  
: 2202005678 (K. THOMAS)  
: 1 - 2204013874 (N. WILLIAMS) **Rule 9 Warrant**  
: 2 - 2112007484 (N. WILLIAMS)  
: 2 - 2201010631 (N. WILLIAMS)  
: 2203003838 (T. WRIGHT)

v.

: INDICTMENT BY THE  
: GRAND JURY

DARVIS EPIEWANE  
NAKIYA GOICURIA  
KAHARRI JACKSON  
JOHN LASSITER  
NAQUAN PEACE  
JYHEIM SPENCER  
KYLEN THOMAS  
NASIR WILLIAMS  
TUSCAN WRIGHT

RECEIVED  
SUPERIOR COURT  
DELAWARE  
MAY 2 11 00 AM  
2022

The Grand Jury charges DARVIS EPIEWANE, NAKIYA GOICURIA, KAHARRI JACKSON, JOHN LASSITER, NAQUAN PEACE, JYHEIM SPENCER, KYLEN THOMAS, NASIR WILLIAMS and TUSCAN WRIGHT with the following offense(s):

COUNT 1

<u>K22-05-</u>	<u>2204013882(J. LASSITER)</u>
<u>K22-05-</u>	<u>2204013861(J. SPENCER)</u>
<u>K22-05- 0162</u>	<u>2204013874(N. WILLIAMS)</u>

RACKETEERING, a felony, in violation of Title 11, Section 1503(a) of the Delaware Code of 1974, as amended.

JOHN LASSITER, JYHEIM SPENCER, and NASIR WILLIAMS between on or about the 16th day of June, 2021, and on or about the 26th day of December, 2021, in the County of Kent, State of Delaware, did, being associated with any enterprise, intentionally conduct or participate in the affairs of the enterprise through a pattern of racketeering: to wit:

- the defendants and each of them did act as a group of persons associated in fact with one another, together with NAQUAN PEACE, TUSCAN WRIGHT, KYLEN THOMAS, NAKIYA GOICURIA, AND DARVIS EPIEWANE, for the purpose of engaging in unlawful straw purchases of firearms;
- the defendants and each of them did engage in two or more incidents of conduct that constituted racketeering activity, in that the activities constituted felonies chargeable under the Delaware Code, or if committed subject to the jurisdiction of the United States or any state of the United States, would have constituted a felony under the Delaware Criminal Code if committed in the State, as set forth in Counts 6 through 51 of this indictment; and
- the incidents were related to the affairs of the enterprise and were not so closely related to each other and connected in point of time and place that they constituted a single event.

RACKETEERING, a felony, in violation of Title 11, Section 1503(a) of the Delaware Code of 1974, as amended.

NAQUAN PEACE between on or about the 16th day of June, 2021, and on or about the 26th day of December, 2021, in the County of Kent, State of Delaware, did, being associated with any enterprise, intentionally conduct or participate in the affairs of the enterprise through a pattern of racketeering: to wit:

- the defendant did act as part of a group of persons associated in fact with JOHN LASSITER, JYHEIM SPENCER, NASIR WILLIAMS, TUSCAN WRIGHT, KYLEN THOMAS, NAKIYA GOICURIA, AND DARVIS EPIEWANE, for the purpose of engaging in unlawful straw purchases of firearms;
- the defendant did engage in two or more incidents of conduct that constituted racketeering activity, in that the activities constituted felonies chargeable under the Delaware Code, as set forth in Counts 6, 7, 9, 38, 40, 41, and/or 44 of this indictment; and
- these incidents were related to the affairs of the enterprise and were not so closely related to each other and connected in point of time and place that they constituted a single event.

COUNT 3

K22-05-

2203003838(T. WRIGHT)

RACKETEERING, a felony, in violation of Title 11, Section 1503(a) of the Delaware Code of 1974, as amended.

TUSCAN WRIGHT between on or about the 23rd day of October, 2021, and on or about the 31st day of October, 2021, in the County of Kent, State of Delaware, intending to promote or facilitate the commission of the offense, did aid, or agree or attempt to aid NASIR WILLIAMS and JYHEIM SPENCER in the commission of RACKETEERING as set forth in COUNT 1 of this indictment, to wit:

- the Defendant did commit offenses related to the unlawful purchase of firearms as set forth in Counts 11 through 14 and/or 18 of this indictment.

COUNT 4

K22-05-

2202005678(K. THOMAS)

RACKETEERING, a felony, in violation of Title 11, Section 1503(a) of the Delaware Code of 1974, as amended.

KYLEN THOMAS between on or about the 29th day of October, 2021, and on or about the 31st day of October, 2021, in the County of Kent, State of Delaware, intending to promote or facilitate the commission of the offense, did aid, or agree or attempt to aid NASIR WILLIAMS, JYHEIM SPENCER, and JOHN LASSITER in the commission of RACKETEERING as set forth in COUNT 1 of this indictment, to wit:

- the Defendant did engage in unlawful purchases of firearms as set forth in Counts 20 through 22 and/or 25 of this indictment.

COUNT 5

K22-05-

2112007478(N. GOICURIA)

RACKETEERING, a felony, in violation of Title 11, Section 1503(a) of the Delaware Code of 1974, as amended.

NAKIYA GOICURIA between on or about the 10th day of November, 2021, and on or about the 16th day of November, 2021, in the County of Kent, State of Delaware, intending to promote or facilitate the commission of the offense, did aid, or agree or attempt to aid NASIR WILLIAMS, JYHEIM SPENCER, and JOHN LASSITER in the commission of RACKETEERING as set forth in COUNT 1 of this indictment, to wit:

- the Defendant did engage in unlawful purchases of firearms as set forth in Counts 27, 28, 29, 32, 33, and/or 36 of this indictment.

**Straw Purchase of One Handgun by Naquan Peace on June 16, 2021**

COUNT 6

K22-05-

2203007365 (N. PEACE)

K22-05-

2201010176(J. LASSITER)

CONSPIRACY SECOND DEGREE, a felony, in violation of Title 11, Section 512(1) of the Delaware Code of 1974, as amended.

NAQUAN PEACE and JOHN LASSITER on or about the 16th day of June, 2021, in the County of New Castle, State of Delaware, did, intending to promote or facilitate the commission of a felony, agree with one another that they or 1 or more of them would engage in conduct constituting the felony of Engaging in a Firearms Transaction on Behalf of Another, as set forth in Count 7 and 8 of this indictment, and/or Making a False Written Statement, as set forth in Count 9 and 10 of this indictment.

COUNT 7

K22-05-

2203007365 (N. PEACE)

ENGAGING IN A FIREARMS TRANSACTION ON BEHALF OF ANOTHER, a felony, in violation of Title 11, Section 1455 of the Delaware Code of 1974, as amended.

NAQUAN PEACE on or about the 16th day of June, 2021, in the County of New Castle, State of Delaware, did knowingly purchase or obtain a Smith and Wesson M&P Shield 9mm handgun, a firearm, on behalf of JOHN LASSITER, who was not qualified to legally purchase a firearm that is a handgun in this State because JOHN LASSITER was less than twenty-one years of age, as set forth in title 18, section 922(b)(1) of the United States Code, and/or because no criminal history background check had been completed on JOHN LASSITER, as set forth in title 11, section 1448B of the Delaware Code.

COUNT 8

K22-05-

2201010176(J. LASSITER)

ENGAGING IN A FIREARMS TRANSACTION ON BEHALF OF ANOTHER, a felony, in violation of Title 11, Section 1455 of the Delaware Code of 1974, as amended.

JOHN LASSITER on or about the 16th day of June, 2021, in the County of New Castle, State of Delaware, intending to promote or facilitate the commission of the offense, did solicit, request, command, importune, or otherwise attempt to cause NAQUAN PEACE to commit the offense of Engaging in a Firearms Transaction on Behalf of Another as set forth in Count 7 of this indictment.

COUNT 9

K22-05-

2203007365 (N. PEACE)

MAKING A FALSE WRITTEN STATEMENT, a felony, in violation of Title 11, Section 1448A of the Delaware Code of 1974, as amended.

NAQUAN PEACE on or about the 16th day of June, 2021, in the County of New Castle, State of Delaware, did willfully and intentionally make a materially false written statement in connection with the purchase, transfer, or attempted purchase or transfer of a firearm pursuant to title 11, section 1448A(a) of the Delaware Code, and the written statement was intended or likely to deceive the licensee, to wit: the Defendant did answer falsely on an ATF Firearms Transaction Record by stating that he was the actual transferee/buyer of a Smith and Wesson M&P Shield 9mm handgun when he was in fact acquiring the firearm on behalf of JOHN LASSITER.

COUNT 10

K22-05-

2201010176(J. LASSITER)

MAKING A FALSE WRITTEN STATEMENT, a felony, in violation of Title 11, Section 1448A of the Delaware Code of 1974, as amended.

JOHN LASSITER on or about the 16th day of June, 2021, in the County of New Castle, State of Delaware, intending to promote or facilitate the commission of the offense, did solicit, request, command, importune, or otherwise attempt to cause NAQUAN PEACE to commit the offense of Making a False Written Statement as set forth in Count 9 of this indictment.

**Straw Purchase of Three Handguns by Tuscan Wright on October 31, 2021**

<u>COUNT 11</u>	<u>K22-05-</u>	<u>2203007223 (J. SPENCER)</u>
	<u>⌈ K22-05-0163</u>	<u>2112007484 (N. WILLIAMS)</u>
	<u>K22-04-0552</u>	<u>2203003838 (T. WRIGHT)</u>

CONSPIRACY SECOND DEGREE, a felony, in violation of Title 11, Section 512(1) of the Delaware Code of 1974, as amended.

JYHEIM SPENCER, NASIR WILLIAMS, and TUSCAN WRIGHT between on or about the 23rd day of October, 2021, and on or about the 31st day of October, 2021, in the County of Kent, State of Delaware, did, intending to promote or facilitate the commission of a felony, agree with one another that they or 1 or more of them would engage in conduct constituting the felony of Engaging in a Firearms Transaction on Behalf of Another, as set forth in Counts 12 through 17 of this indictment, and/or Making a False Written Statement, as set forth in Counts 18 and 19 of this indictment.

<u>COUNT 12</u>	<u>K22-04-0548</u>	<u>2203003838(T. WRIGHT)</u>
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ENGAGING IN A FIREARMS TRANSACTION ON BEHALF OF ANOTHER, a felony, in violation of Title 11, Section 1455 of the Delaware Code of 1974, as amended.

TUSCAN WRIGHT on or about the 31st day of October, 2021, in the County of Kent, State of Delaware, did knowingly purchase or obtain a Taurus G3C 9mm handgun bearing serial number ACK352007, a firearm, on behalf of NASIR WILLIAMS, who was not qualified to legally purchase a firearm that is a handgun in this State because NASIR WILLIAMS was less than twenty-one years of age, as set forth in title 18, section 922(b)(1) of the United States Code, and/or because no criminal history background check had been completed on NASIR WILLIAMS, as set forth in title 11, section 1448B of the Delaware Code.



COUNT 13

K22-04-0549

2203003838(T. WRIGHT)

ENGAGING IN A FIREARMS TRANSACTION ON BEHALF OF ANOTHER, a felony, in violation of Title 11, Section 1455 of the Delaware Code of 1974, as amended.

TUSCAN WRIGHT on or about the 31st day of October, 2021, in the County of Kent, State of Delaware, did knowingly purchase or obtain a Glock 27 .40 caliber handgun, a firearm, on behalf of NASIR WILLIAMS, who was not qualified to legally purchase a firearm that is a handgun in this State because NASIR WILLIAMS was less than twenty-one years of age, as set forth in title 18, section 922(b)(1) of the United States Code, and/or because no criminal history background check had been completed on NASIR WILLIAMS, as set forth in title 11, section 1448B of the Delaware Code.

COUNT 14

K22-04-0550

2203003838(T. WRIGHT)

ENGAGING IN A FIREARMS TRANSACTION ON BEHALF OF ANOTHER, a felony, in violation of Title 11, Section 1455 of the Delaware Code of 1974, as amended.

TUSCAN WRIGHT on or about the 31st day of October, 2021, in the County of Kent, State of Delaware, did knowingly purchase or obtain a Glock 22 .40 caliber handgun, a firearm, on behalf of NASIR WILLIAMS, who was not qualified to legally purchase a firearm that is a handgun in this State because NASIR WILLIAMS was less than twenty-one years of age, as set forth in title 18, section 922(b)(1) of the United States Code, and/or because no criminal history background check had been completed on NASIR WILLIAMS, as set forth in title 11, section 1448B of the Delaware Code.

COUNT 15

K22-05- 2203007223 (J. SPENCER)  
I K22-05- 0164 2112007484(N. WILLIAMS)

ENGAGING IN A FIREARMS TRANSACTION ON BEHALF OF ANOTHER, a felony, in violation of Title 11, Section 1455 of the Delaware Code of 1974, as amended.

JYHEIM SPENCER and NASIR WILLIAMS between on or about the 23rd day of October, 2021, and on or about the 31st day of October, 2021, in the County of Kent, State of Delaware, intending to promote or facilitate the commission of the offense, did aid, counsel, or agree or attempt to aid TUSCAN WRIGHT in planning or committing the offense of Engaging in a Firearms Transaction on Behalf of Another as set forth in Count 12 of this indictment, or did solicit, request, command, importune, or otherwise attempt to cause TUSCAN WRIGHT to commit said offense.

COUNT 16

K22-05- 2203007223 (J. SPENCER)  
I K22-05- 0165 2112007484 N. WILLIAMS)

ENGAGING IN A FIREARMS TRANSACTION ON BEHALF OF ANOTHER, a felony, in violation of Title 11, Section 1455 of the Delaware Code of 1974, as amended.

JYHEIM SPENCER and NASIR WILLIAMS between on or about the 23rd day of October, 2021, and on or about the 31st day of October, 2021, in the County of Kent, State of Delaware, intending to promote or facilitate the commission of the offense, did aid, counsel, or agree or attempt to aid TUSCAN WRIGHT in planning or committing the offense of Engaging in a Firearms Transaction on Behalf of Another as set forth in Count 13 of this indictment, or did solicit, request, command, importune, or otherwise attempt to cause TUSCAN WRIGHT to commit said offense.

COUNT 17

K22-05- 2203007223 (J. SPENCER)  
I K22-05-0166 2112007484 (N. WILLIAMS)

ENGAGING IN A FIREARMS TRANSACTION ON BEHALF OF ANOTHER, a felony, in violation of Title 11, Section 1455 of the Delaware Code of 1974, as amended.

JYHEIM SPENCER and NASIR WILLIAMS between on or about the 23rd day of October, 2021, and on or about the 31st day of October, 2021, in the County of Kent, State of Delaware, intending to promote or facilitate the commission of the offense, did aid, counsel, or agree or attempt to aid TUSCAN WRIGHT in planning or committing the offense of Engaging in a Firearms Transaction on Behalf of Another as set forth in Count 14 of this indictment, or did solicit, request, command, importune, or otherwise attempt to cause TUSCAN WRIGHT to commit said offense.

COUNT 18

K22-04-0551

2203003838(T. WRIGHT)

MAKING A FALSE WRITTEN STATEMENT, a felony, in violation of Title 11, Section 1448A of the Delaware Code of 1974, as amended.

TUSCAN WRIGHT on or about the 28th day of October, 2021, in the County of Kent, State of Delaware, did willfully and intentionally make a materially false written statement in connection with the purchase, transfer, or attempted purchase or transfer of a firearm pursuant to title 11, section 1448A(a) of the Delaware Code, and the written statement was intended or likely to deceive the licensee, to wit: the Defendant did answer falsely on an ATF Firearms Transaction Record by stating that he was the actual transferee/buyer of the following firearm(s):

- a Taurus G3C 9mm handgun bearing serial number ACK352007;
- a Glock 27 .40 caliber handgun; and/or
- a Glock 22 .40 caliber handgun;

when he was in fact acquiring said firearm(s) on behalf of JYHEIM SPENCER and/or NASIR WILLIAMS.

COUNT 19

<u>K22-05-</u>	<u>2203007223 (J. SPENCER)</u>
<u>I K22-05- 0167</u>	<u>2112007484 (N. WILLIAMS)</u>

MAKING A FALSE WRITTEN STATEMENT, a felony, in violation of Title 11, Section 1448A of the Delaware Code of 1974, as amended.

JYHEIM SPENCER and NASIR WILLIAMS between on or about the 23rd day of October, 2021, and on or about the 28th day of October, 2021, in the County of Kent, State of Delaware, intending to promote or facilitate the commission of the offense, did aid, counsel, or agree or attempt to aid TUSCAN WRIGHT in planning or committing the offense of Making a False Written Statement as set forth in Count 18 of this indictment, or did solicit, request, command, importune, or otherwise attempt to cause TUSCAN WRIGHT to commit said offense.

**Straw Purchase of Two Handguns by Kylene Thomas on November 3, 2021**

COUNT 20

<u>K22-05-</u>	<u>2201010176(J. LASSITER)</u>
<u>K22-05-</u>	<u>2203007223 (J. SPENCER))</u>
<u>K22-05-</u>	<u>2202005678(K THOMAS)</u>
<u>I K22-05- 0168</u>	<u>2112007484 (N. WILLIAMS)</u>

CONSPIRACY SECOND DEGREE, a felony, in violation of Title 11, Section 512(1) of the Delaware Code of 1974, as amended.

JOHN LASSITER, JYHEIM SPENCER, KYLEN THOMAS and NASIR WILLIAMS, between on or about the 29th day of October, 2021, and on or about the 3rd day of November, 2021, in the County of Kent, State of Delaware, did, intending to promote or facilitate the commission of a felony, agree with one another that they or 1 or more of them would engage in conduct constituting the felony of Engaging in a Firearms Transaction on Behalf of Another, as set forth in Counts 21 through 24 of this indictment, and/or Making a False Written Statement, as set forth in Counts 25 and 26 of this indictment.

COUNT 21

K22-04-0140

2202005678 (K. THOMAS)

ENGAGING IN A FIREARMS TRANSACTION ON BEHALF OF ANOTHER, a felony, in violation of Title 11, Section 1455 of the Delaware Code of 1974, as amended.

KYLEN THOMAS between on or about the 3rd day of November, 2021, in the County of Kent, State of Delaware, did knowingly purchase or obtain a Taurus G3C 9mm handgun bearing serial number ACK352007, a firearm, on behalf of JYHEIM SPENCER, who was not qualified to legally purchase a firearm that is a handgun in this State because JYHEIM SPENCER was less than twenty-one years of age, as set forth in title 18, section 922(b)(1) of the United States Code, and/or because no criminal history background check had been completed on JYHEIM SPENCER, as set forth in title 11, section 1448B of the Delaware Code.

COUNT 22

K22-04-0141

2202005678 (K. THOMAS)

ENGAGING IN A FIREARMS TRANSACTION ON BEHALF OF ANOTHER, a felony, in violation of Title 11, Section 1455 of the Delaware Code of 1974, as amended.

KYLEN THOMAS on or about the 3rd day of November, 2021, in the County of Kent, State of Delaware, did knowingly purchase or obtain a Ruger 57 5.7 caliber handgun, a firearm, on behalf of JYHEIM SPENCER, who was not qualified to legally purchase a firearm that is a handgun in this State because JYHEIM SPENCER was less than twenty-one years of age, as set forth in title 18, section 922(b)(1) of the United States Code, and/or because no criminal history background check had been completed on JYHEIM SPENCER, as set forth in title 11, section 1448B of the Delaware Code.

COUNT 23

<u>K22-05-</u>	<u>2201010176 (J. LASSITER)</u>
<u>K22-05-</u>	<u>2203007223 (J. SPENCER)</u>
<u>I K22-05-0169</u>	<u>2112007484 (N. WILLIAMS)</u>

ENGAGING IN A FIREARMS TRANSACTION ON BEHALF OF ANOTHER, a felony, in violation of Title 11, Section 1455 of the Delaware Code of 1974, as amended.

JOHN LASSITER, JYHEIM SPENCER and NASIR WILLIAMS between on or about the 29th day of October, 2021, and on or about the 3rd day of November, 2021, in the County of Kent, State of Delaware, intending to promote or facilitate the commission of the offense, did aid, counsel, or agree or attempt to aid KYLEN THOMAS in planning or committing the offense of Engaging in a Firearms Transaction on Behalf of Another as set forth in Count 21 of this indictment, or did solicit, request, command, importune, or otherwise attempt to cause KYLEN THOMAS to commit said offense.

COUNT 24

<u>K22-05-</u>	<u>2201010176 (J. LASSITER)</u>
<u>K22-05-</u>	<u>2203007223 (J. SPENCER)</u>
<u>I K22-05-0170</u>	<u>2112007484 (N. WILLIAMS)</u>

ENGAGING IN A FIREARMS TRANSACTION ON BEHALF OF ANOTHER, a felony, in violation of Title 11, Section 1455 of the Delaware Code of 1974, as amended.

JOHN LASSITER, JYHEIM SPENCER and NASIR WILLIAMS between on or about the 29th day of October, 2021, and on or about the 3rd day of November, 2021, in the County of Kent, State of Delaware, intending to promote or facilitate the commission of the offense, did aid, counsel, or agree or attempt to aid KYLEN THOMAS in planning or committing the offense of Engaging in a Firearms Transaction on Behalf of Another as set forth in Count 22 of this indictment, or did solicit, request, command, importune, or otherwise attempt to cause KYLEN THOMAS to commit said offense.

MAKING A FALSE WRITTEN STATEMENT, a felony, in violation of Title 11, Section 1448A of the Delaware Code of 1974, as amended.

KYLEN THOMAS on or about the 3rd day of November, in the County of Kent, State of Delaware, did willfully and intentionally make a materially false written statement in connection with the purchase, transfer, or attempted purchase or transfer of a firearm pursuant to title 11, section 1448A(a) of the Delaware Code, and the written statement was intended or likely to deceive the licensee, to wit: the Defendant did answer falsely on an ATF Firearms Transaction Record by stating that he was the actual transferee/buyer of the following firearm(s):

- a Taurus G3C 9mm handgun; and/or
- a Ruger 57 5.7 caliber handgun;

when he was in fact acquiring said firearm(s) on behalf of JYHEIM SPENCER and/or JOHN LASSITER.



COUNT 26

<u>K22-05-</u>	<u>2201010176(J. LASSITER)</u>
<u>K22-05-</u>	<u>2203007223 (J. SPENCER)</u>
<u>I K22-05- 0171</u>	<u>2112007484 (N. WILLIAMS)</u>

MAKING A FALSE WRITTEN STATEMENT, a felony, in violation of Title 11,  
Section 1448A of the Delaware Code of 1974, as amended.

JOHN LASSITER, JYHEIM SPENCER and NASIR WILLIAMS between on or about the 29th day of October, 2021, and on or about the 3rd day of November, 2021, in the County of Kent, State of Delaware, intending to promote or facilitate the commission of the offense, did aid, counsel, or agree or attempt to aid KYLEN THOMAS in planning or committing the offense of Making a False Written Statement as set forth in Count 25 of this indictment, or did solicit, request, command, importune, or otherwise attempt to cause KYLEN THOMAS to commit said offense.

**Straw Purchase of Two Handguns by Nakiya Goicuria on November 16, 2021**

<u>COUNT 27</u>	<u>K22-05-</u>	<u>2112007478 (N. GOICURIA)</u>
	<u>K22-05-</u>	<u>2204013950 (K. JACKSON)</u>
	<u>I K22-05- 0172</u>	<u>2112007484 (N. WILLIAMS)</u>

CONSPIRACY SECOND DEGREE, a felony, in violation of Title 11, Section 512(1) of the Delaware Code of 1974, as amended.

NAKIYA GOICURIA, KAHARRI JACKSON and NASIR WILLIAMS between on or about the 29th day of October, 2021, and on or about the 10th day of November, 2021, and on or about the 16th day of November, 2021, in the County of Kent, State of Delaware, did, intending to promote or facilitate the commission of a felony, agree with one another that they or 1 or more of them would engage in conduct constituting the felony of Engaging in a Firearms Transaction on Behalf of Another, as set forth in Counts 32 through 35 of this indictment, and/or Making a False Written Statement, as set forth in Counts 36 and 37 of this indictment.

COUNT 28

K22-05-

2112007478(N. GOICURIA)

GIVING A FIREARM TO PERSON PROHIBITED, a felony, in violation of Title 11, Section 1454 of the Delaware Code of 1974, as amended.

NAKIYA GOICURIA on or about the 16th day of November, 2021, in the County of Kent, State of Delaware, did sell, transfer, give, lend or otherwise furnish a firearm, a Glock 19 9mm handgun, to NASIR WILLIAMS, knowing that said person was a person prohibited as defined in title 11, section 1448 of this title, to wit: NASIR WILLIAMS was a person prohibited because he was under the age of twenty-five years and had, as a juvenile, been adjudicated as delinquent for conduct which, if committed by an adult, would constitute the felony of Carrying a Concealed Deadly Weapon, in case number 2107014997, in the Family Court of the State of Delaware in and for Kent County, on or about the 15th day of November, 2021.

COUNT 29

K22-05-

2112007478(N. GOICURIA)

GIVING A FIREARM TO PERSON PROHIBITED, a felony, in violation of Title 11, Section 1454 of the Delaware Code of 1974, as amended.

NAKIYA GOICURIA on or about the 16th day of November, 2021, in the County of Kent, State of Delaware, did sell, transfer, give, lend or otherwise furnish a firearm, a Glock 19X 9mm handgun, to NASIR WILLIAMS, knowing that said person was a person prohibited as defined in title 11, section 1448 of this title, to wit: NASIR WILLIAMS was a person prohibited because he was under the age of twenty-five years and had, as a juvenile, been adjudicated as delinquent for conduct which, if committed by an adult, would constitute the felony of Carrying a Concealed Deadly Weapon, in case number 2107014997, in the Family Court of the State of Delaware in and for Kent County, on or about the 15th day of November, 2021.

COUNT 30

I K22-03-0593

2112007484

2112007478 (N. WILLIAMS)

POSSESSION OF A FIREARM BY A PERSON PROHIBITED, a felony, in violation of Title 11, Section 1448(a)(4) of the Delaware Code of 1974, as amended.

NASIR WILLIAMS on or about the 16th day of November, 2021, in the County of Kent, State of Delaware, did knowingly purchase, own, possess, or a control a firearm, a Glock 19 9mm handgun, being under the age of twenty-five years and having, as a juvenile, been adjudicated as delinquent for conduct which, if committed by an adult, would constitute the felony of Carrying a Concealed Deadly Weapon, in case number 2107014997, in the Family Court of the State of Delaware in and for Kent County, on or about the 15th day of November, 2021.

COUNT 31

I K22-03-0594

2112007484

2112007478 (N. WILLIAMS)

POSSESSION OF A FIREARM BY A PERSON PROHIBITED, a felony, in violation of Title 11, Section 1448(a)(4) of the Delaware Code of 1974, as amended.

NASIR WILLIAMS on or about the 16th day of November, 2021, in the County of Kent, State of Delaware, did knowingly purchase, own, possess, or a control a firearm, a Glock 19X 9mm handgun, being under the age of twenty-five years and having, as a juvenile, been adjudicated as delinquent for conduct which, if committed by an adult, would constitute the felony of Carrying a Concealed Deadly Weapon, in case number 2107014997, in the Family Court of the State of Delaware in and for Kent County, on or about the 15th day of November, 2021.

COUNT 32

K22-05-

2112007478 (N. GOICURIA)

ENGAGING IN A FIREARMS TRANSACTION ON BEHALF OF ANOTHER, a felony, in violation of Title 11, Section 1455 of the Delaware Code of 1974, as amended.

NAKIYA GOICURIA on or about the 16th day of November, 2021, in the County of Kent, State of Delaware, did knowingly purchase or obtain a Glock 19 9mm handgun, a firearm, on behalf of NASIR WILLIAMS, who was not qualified to legally purchase a firearm in this State because NASIR WILLIAMS, being under the age of twenty-five years, had, as a juvenile, been adjudicated as delinquent for conduct which, if committed by an adult, would constitute the felony of Carrying a Concealed Deadly Weapon, in case number 2107014997, in the Family Court of the State of Delaware in and for Kent County, on or about the 15th day of November, 2021, and thus was prohibited from purchasing a firearm as set forth in title 11, section 1448 of the Delaware Code.

COUNT 33

K22-05-

2112007478 (N. GOICURIA)

ENGAGING IN A FIREARMS TRANSACTION ON BEHALF OF ANOTHER, a felony, in violation of Title 11, Section 1455 of the Delaware Code of 1974, as amended.

NAKIYA GOICURIA on or about the 16th day of November, 2021, in the County of Kent, State of Delaware, did knowingly purchase or obtain a Glock 19X 9mm handgun, a firearm, on behalf of NASIR WILLIAMS, who was not qualified to legally purchase a firearm in this State because NASIR WILLIAMS, being under the age of twenty-five years, had, as a juvenile, been adjudicated as delinquent for conduct which, if committed by an adult, would constitute the felony of Carrying a Concealed Deadly Weapon, in case number 2107014997, in the Family Court of the State of Delaware in and for Kent County, on or about the 15th day of November, 2021, and thus was prohibited from purchasing a firearm as set forth in title 11, section 1448 of the Delaware Code.

COUNT 34

K22-05- 2204013950 (K. JACKSON)  
I K22-05-0173 2112007484 (N. WILLIAMS)

ENGAGING IN A FIREARMS TRANSACTION ON BEHALF OF ANOTHER, a felony, in violation of Title 11, Section 1455 of the Delaware Code of 1974, as amended.

KAHARRI JACKSON and NASIR WILLIAMS between on or about the 10th day of November, 2021, and on or about the 16th day of November, 2021, in the County of Kent, State of Delaware, intending to promote or facilitate the commission of the offense, did aid, counsel, or agree or attempt to aid NAKIYA GOICURIA in planning or committing the offense of Engaging in a Firearms Transaction on Behalf of Another as set forth in Count 32 of this indictment, or did solicit, request, command, importune, or otherwise attempt to cause NAKIYA GOICURIA to commit said offense.

COUNT 35

I K22-05-0174 2112007484 (N. WILLIAMS)

ENGAGING IN A FIREARMS TRANSACTION ON BEHALF OF ANOTHER, a felony, in violation of Title 11, Section 1455 of the Delaware Code of 1974, as amended.

NASIR WILLIAMS between on or about the 10th day of November, 2021, and on or about the 16th day of November, 2021, in the County of Kent, State of Delaware, intending to promote or facilitate the commission of the offense, did aid, counsel, or agree or attempt to aid NAKIYA GOICURIA in planning or committing the offense of Engaging in a Firearms Transaction on Behalf of Another as set forth in Count 33 of this indictment, or did solicit, request, command, importune, or otherwise attempt to cause NAKIYA GOICURIA to commit said offense.

COUNT 36

K22-05-

2112007478 (N. GOICURIA)

MAKING A FALSE WRITTEN STATEMENT, a felony, in violation of Title 11, Section 1448A of the Delaware Code of 1974, as amended.

NAKIYA GOICURIA on or about the 3rd day of November, 2021, in the County of Kent, State of Delaware, did willfully and intentionally make a materially false written statement in connection with the purchase, transfer, or attempted purchase or transfer of a firearm pursuant to title 11, section 1448A(a) of the Delaware Code, and the written statement was intended or likely to deceive the licensee, to wit: the Defendant did answer falsely on an ATF Firearms Transaction Record by stating that she was the actual transferee/buyer of the following firearm(s):

- a Glock 19 9mm handgun; and/or
- a Glock 19X 9mm handgun;

when she was in fact acquiring said firearm(s) on behalf of NASIR WILLIAMS.

COUNT 37

I K22-05-0175

2112007484 (N. WILLIAMS)

MAKING A FALSE WRITTEN STATEMENT, a felony, in violation of Title 11, Section 1448A of the Delaware Code of 1974, as amended.

NASIR WILLIAMS between on or about the 10th day of November, 2021, and on or about the 16th day of November, 2021, in the County of Kent, State of Delaware, intending to promote or facilitate the commission of the offense, did aid, counsel, or agree or attempt to aid NAKIYA GOICURIA in planning or committing the offense of Making a False Written Statement as set forth in Count 36 of this indictment, or did solicit, request, command, importune, or otherwise attempt to cause NAKIYA GOICURIA to commit said offense.

**Straw Purchase of Two Handguns by Naquan Peace on December 13, 2021**

COUNT 38

K22-05- 2203007365 (N. PEACE)  
I K22-05- 0176 2112007484 (N. WILLIAMS)

CONSPIRACY SECOND DEGREE, a felony, in violation of Title 11, Section 512(1) of the Delaware Code of 1974, as amended.

NAQUAN PEACE and NASIR WILLIAMS, between on or about the 7th day of November, 2021, and on or about the 13th day of December, 2021, in the County of Kent, State of Delaware, did, intending to promote or facilitate the commission of a felony, agree with one another that they or 1 or more of them would engage in conduct constituting the felony of Engaging in a Firearms Transaction on Behalf of Another, as set forth in Counts 40 through 43 of this indictment, and/or Making a False Written Statement, as set forth in Counts 44 and 45 of this indictment.

COUNT 39

I K22-05- 0177 2112007484 (N. WILLIAMS)

POSSESSION OF A FIREARM BY A PERSON PROHIBITED, a felony, in violation of Title 11, Section 1448(a)(4) of the Delaware Code of 1974, as amended.

NASIR WILLIAMS on or about the 13th day of December, 2021, in the County of Kent, State of Delaware, did knowingly purchase, own, possess, or a control a firearm, a Taurus G3C handgun, being under the age of twenty-five years and having, as a juvenile, been adjudicated as delinquent for conduct which, if committed by an adult, would constitute the felony of Carrying a Concealed Deadly Weapon, in case number 2107014997, in the Family Court of the State of Delaware in and for Kent County, on or about the 15th day of November, 2021.



COUNT 40

K22-05-

2203007365 (N. PEACE)

ENGAGING IN A FIREARMS TRANSACTION ON BEHALF OF ANOTHER, a felony, in violation of Title 11, Section 1455 of the Delaware Code of 1974, as amended.

NAQUAN PEACE on or about the 13th day of December, 2021, in the County of Kent, State of Delaware, did knowingly purchase or obtain a Taurus G2C 9mm handgun bearing serial number 1C085911, a firearm, on behalf of NASIR WILLIAMS, who was not qualified to legally purchase a firearm in this State because NASIR WILLIAMS, being under the age of twenty-five years, had, as a juvenile, been adjudicated as delinquent for conduct which, if committed by an adult, would constitute the felony of Carrying a Concealed Deadly Weapon, in case number 2107014997, in the Family Court of the State of Delaware in and for Kent County, on or about the 15th day of November, 2021, and thus was prohibited from purchasing a firearm as set forth in title 11, section 1448 of the Delaware Code.

COUNT 41

K22-05- 2203007365 (N. PEACE)

ENGAGING IN A FIREARMS TRANSACTION ON BEHALF OF ANOTHER, a felony, in violation of Title 11, Section 1455 of the Delaware Code of 1974, as amended.

NAQUAN PEACE on or about the 13th day of December, 2021, in the County of Kent, State of Delaware, did knowingly purchase or obtain a Taurus G3C, a firearm, on behalf of NASIR WILLIAMS, who was not qualified to legally purchase a firearm in this State because NASIR WILLIAMS, being under the age of twenty-five years, had, as a juvenile, been adjudicated as delinquent for conduct which, if committed by an adult, would constitute the felony of Carrying a Concealed Deadly Weapon, in case number 2107014997, in the Family Court of the State of Delaware in and for Kent County, on or about the 15th day of November, 2021, and thus was prohibited from purchasing a firearm as set forth in title 11, section 1448 of the Delaware Code.

COUNT 42

I K22-05- 0178 2112007484 (N. WILLIAMS)

ENGAGING IN A FIREARMS TRANSACTION ON BEHALF OF ANOTHER, a felony, in violation of Title 11, Section 1455 of the Delaware Code of 1974, as amended.

NASIR WILLIAMS between on or about the 7th day of November, 2021, and on or about the 13th day of December, 2021, in the County of Kent, State of Delaware, intending to promote or facilitate the commission of the offense, did solicit, request, command, importune, or otherwise attempt to cause NAQUAN PEACE to commit the offense of Engaging in a Firearms Transaction on Behalf of Another as set forth in Count 40 of this indictment.

COUNT 43

I K22-05-0179

2112007484 (N. WILLIAMS)

ENGAGING IN A FIREARMS TRANSACTION ON BEHALF OF ANOTHER, a felony, in violation of Title 11, Section 1455 of the Delaware Code of 1974, as amended.

NASIR WILLIAMS between on or about the 7th day of November, 2021, and on or about the 13th day of December, 2021, in the County of Kent, State of Delaware, intending to promote or facilitate the commission of the offense, did solicit, request, command, importune, or otherwise attempt to cause NAQUAN PEACE to commit the offense of Engaging in a Firearms Transaction on Behalf of Another as set forth in Count 41 of this indictment.

COUNT 44

K22-05

2203007365 (N. PEACE)

MAKING A FALSE WRITTEN STATEMENT, a felony, in violation of Title 11, Section 1448A of the Delaware Code of 1974, as amended.

NAQUAN PEACE on or about the 13th day of December, 2021, in the County of Kent, State of Delaware, did willfully and intentionally make a materially false written statement in connection with the purchase, transfer, or attempted purchase or transfer of a firearm pursuant to title 11, section 1448A(a) of the Delaware Code, and the written statement was intended or likely to deceive the licensee, to wit: the Defendant did answer falsely on an ATF Firearms Transaction Record by stating that he was the actual transferee/buyer of the following firearm(s):

- Taurus G2C 9mm handgun bearing serial number 1C085911; and/or
- a Taurus G3C 9mm handgun;

when he was in fact acquiring said firearm(s) on behalf of NASIR WILLIAMS.

COUNT 45

IK22-05-0180

2112007484 (N. WILLIAMS)

MAKING A FALSE WRITTEN STATEMENT, a felony, in violation of Title 11, Section 1448A of the Delaware Code of 1974, as amended.

NASIR WILLIAMS between on or about the 7th day of November, 2021, and on or about the 13th day of December, 2021, in the County of Kent, State of Delaware, intending to promote or facilitate the commission of the offense, did solicit, request, command, importune, or otherwise attempt to cause NAQUAN PEACE to commit the offense of Making a False Written Statement as set forth in Count 44 of this indictment.

**Straw Purchase of Two Handguns by Darvis Epiewane on December 26, 2021**

COUNT 46

K22-04-0041

2201010172 (D. EPIEWANE)

K22-04-0043

2201010176 (J. LASSITER)

CONSPIRACY SECOND DEGREE, a felony, in violation of Title 11, Section 512(1) of the Delaware Code of 1974, as amended.

DARVIS EPIEWANE and JOHN LASSITER between on or about the 20th day of December, 2021, and on or about the 26th day of December, 2021, in the County of Kent, State of Delaware, did, intending to promote or facilitate the commission of a felony, agree with one another that they or 1 or more of them would engage in conduct constituting the felony of Engaging in a Firearms Transaction on Behalf of Another, as set forth in Counts 47 and 48 of this indictment, and/or Making a False Written Statement, as set forth in Counts 49 and 50 of this indictment.

COUNT 47

K22-04-0039

2201010172 (D. EPIEWANE)

ENGAGING IN A FIREARMS TRANSACTION ON BEHALF OF ANOTHER, a felony, in violation of Title 11, Section 1455 of the Delaware Code of 1974, as amended.

DARVIS EPIEWANE on or about the 26th day of December, 2021, in the County of Kent, State of Delaware, did knowingly purchase or obtain a Taurus G2C 9mm handgun bearing serial number ACK423967, a firearm, on behalf of JOHN LASSITER, who was not qualified to legally purchase a firearm that is a handgun in this State because JOHN LASSITER was less than twenty-one years of age, as set forth in title 18, section 922(b)(1) of the United States Code, and/or because no criminal history background check had been completed on JOHN LASSITER, as set forth in title 11, section 1448B of the Delaware Code.

COUNT 48

K22-04-0042

2201010176 (J. LASSITER)

ENGAGING IN A FIREARMS TRANSACTION ON BEHALF OF ANOTHER, a felony, in violation of Title 11, Section 1455 of the Delaware Code of 1974, as amended.

JOHN LASSITER between on or about the 20th day of December, 2021, and on or about the 26th day of December, 2021, in the County of Kent, State of Delaware, intending to promote or facilitate the commission of the offense, did solicit, request, command, importune, or otherwise attempt to cause DARVIS EPIEWANE to commit the offense of Engaging in a Firearms Transaction on Behalf of Another as set forth in Count 47 of this indictment.

COUNT 49

K22-04-0040

2201010172 (D. EPIEWANE)

MAKING A FALSE WRITTEN STATEMENT, a felony, in violation of Title 11, Section 1448A of the Delaware Code of 1974, as amended.

DARVIS EPIEWANE on or about the 26th day of June, 2021, in the County of Kent, State of Delaware, did willfully and intentionally make a materially false written statement in connection with the purchase, transfer, or attempted purchase or transfer of a firearm pursuant to title 11, section 1448A(a) of the Delaware Code, and the written statement was intended or likely to deceive the licensee, to wit: the Defendant did answer falsely on an ATF Firearms Transaction Record by stating that he was the actual transferee/buyer of a firearm, a Taurus G2C 9mm handgun bearing serial number ACK423967, when he was in fact acquiring the firearm on behalf of JOHN LASSITER.

COUNT 50

K22-05-

2201010176 (J. LASSITER)

MAKING A FALSE WRITTEN STATEMENT, a felony, in violation of Title 11, Section 1448A of the Delaware Code of 1974, as amended.

JOHN LASSITER between on or about the 20th day of December, 2021, and on or about the 26th day of December, 2021, in the County of Kent, State of Delaware, intending to promote or facilitate the commission of the offense, did solicit, request, command, importune, or otherwise attempt to cause DARVIS EPIEWANE to commit the offense of Making a False Written Statement as set forth in Count 49 of this indictment.

**Recovery of a Purchased Firearm from Nasir Williams on January 27, 2022**

COUNT 51

IK22-05-0181

2201010631 (N. WILLIAMS)

POSSESSION OF A FIREARM BY A PERSON PROHIBITED, a felony, in violation of Title 11, Section 1448(a)(4) of the Delaware Code of 1974, as amended.

NASIR WILLIAMS on or about the 27th day of January, 2022, in the County of Kent, State of Delaware, did knowingly possess or a control a firearm, a Taurus G2C 9mm handgun bearing serial number 1C085911, being under the age of twenty-five years and having, as a juvenile, been adjudicated as delinquent for conduct which, if committed by an adult, would constitute the felony of Carrying a Concealed Deadly Weapon, in case number 2107014997, in the Family Court of the State of Delaware in and for Kent County, on or about the 15th day of November, 2021.

COUNT 52

IK22-05-0182

2201010631 (N. WILLIAMS)

POSSESSION OF FIREARM AMMUNITION BY A PERSON PROHIBITED, a felony, in violation of Title 11, Section 1448(a)(4) of the Delaware Code of 1974, as amended.

NASIR WILLIAMS on or about the 27th day of January, 2022, in the County of Kent, State of Delaware, did knowingly possess or a control ammunition for a firearm, being under the age of twenty-five years and having, as a juvenile, been adjudicated as delinquent for conduct which, if committed by an adult, would constitute the felony of Carrying a Concealed Deadly Weapon, in case number 2107014997, in the Family Court of the State of Delaware in and for Kent County, on or about the 15th day of November, 2021.

COUNT 53

IK22-03-0590

2201010631 (N. WILLIAMS)

CARRYING A CONCEALED DEADLY WEAPON (FIREARM), a felony, in violation of Title 11, Section 1442 of the Delaware Code of 1974, as amended.

NASIR WILLIAMS on or about the 27th day of January, 2022, in the County of Kent, State of Delaware, did knowingly carry concealed a deadly weapon, a Taurus G2C 9mm handgun bearing serial number 1C085911, a firearm, upon or about his person without a license to do so.

COUNT 54

IK22-03-0592

2201010631 (N. WILLIAMS)

POSSESSION OF MARIJUANA, a civil violation, in violation of Title 16, Section 4764(c)(1) of the Delaware Code of 1974, as amended.

NASIR WILLIAMS on or about the 27th day of January, 2022, in the County of Kent, State of Delaware, did knowingly possess a personal use quantity of marijuana, a controlled substance classified in title 16, section 4714(d)(19) of the Delaware Code.

A TRUE BILL

Kathleen M. Jennings  
ATTORNEY GENERAL



KEVIN B. SMITH  
Deputy Attorney General