

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Criminal Case No. 21-cr-00331-DDD

UNITED STATES OF AMERICA,

Plaintiff,

v.

NATHANIEL DAVID CORSER,

Defendant.

INDICTMENT

The Grand Jury charges:

COUNT 1

On or about June 16, 2021, in the State and District of Colorado, the defendant, NATHANIEL DAVID CORSER, did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

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

COUNT 2

On or about July 4, 2021, in the State and District of Colorado, the defendant, NATHANIEL DAVID CORSER, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, the use of which resulted in the death of K.N. on or about that same date.

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

COUNT 3

On or about July 8, 2021, in the State and District of Colorado, the defendant, NATHANIEL DAVID CORSER, did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

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

COUNT 4

On or about July 8, 2021, in the State and District of Colorado, the defendant, NATHANIEL DAVID CORSER, did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C), within 1,000 feet of the real property comprising William Palmer High School, a public secondary school.

All in violation of Title 21, United States Code, Section 860.

COUNT 5

On or about July 15, 2021, in the State and District of Colorado, the defendant, NATHANIEL DAVID CORSER, did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a

Schedule II controlled substance.

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

COUNT 6

On or about July 15, 2021, in the State and District of Colorado, the defendant, NATHANIEL DAVID CORSER, did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C), within 1,000 feet of the real property comprising William Palmer High School, a public secondary school.

All in violation of Title 21, United States Code, Section 860.

COUNT 7

On or about July 15, 2021, in the State and District of Colorado, the defendant, NATHANIEL DAVID CORSER, did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of morphine, a Schedule II controlled substance.

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

COUNT 8

On or about July 15, 2021, in the State and District of Colorado, the defendant, NATHANIEL DAVID CORSER, did knowingly and intentionally possess with intent to

distribute a mixture and substance containing a detectable amount of morphine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C), within 1,000 feet of the real property comprising William Palmer High School, a public secondary school.

All in violation of Title 21, United States Code, Section 860.

COUNT 9

On or about July 15, 2021, in the State and District of Colorado, the defendant, NATHANIEL DAVID CORSER, did knowingly use and carry a firearm during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely possession with intent to distribute fentanyl as charged in Count 5 and possession with intent to distribute morphine as charged in Count 7, and did possess a firearm in furtherance of those same offenses.

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

FORFEITURE ALLEGATION

1. The allegations contained in Counts 1 through 9 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853, and Title 18, United States Code, Section 924(d).

2. Upon conviction of the violations alleged in Counts 1 through 8 of this Indictment involving violations of Title 21, United States Code, Sections 841(a)(1) and

860, the defendant, NATHANIEL DAVID CORSER, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all of the defendant's right, title and interest in all property constituting and derived from any proceeds obtained directly and indirectly as a result of such offense(s), and in all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offense(s).

3. Upon conviction of the violation alleged in Count 9 of this Indictment involving a violation of Title 18, United States Code, Section 924(c), the defendant, NATHANIEL DAVID CORSER, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of the offense, including a FN Model 503 semi-automatic 9mm handgun bearing serial number CV018486.

4. 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 subdivided 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 said defendant up to the value of the forfeitable property.

A TRUE BILL:

Ink signature on file in Clerk's Office
FOREPERSON

MATTHEW T. KIRSCH
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