UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Case No. 6:16-CR- 393-AA

Plaintiff,

INDICTMENT

Count 1: Felon in Possession of a

Firearm

18 U.S.C. § 922(g)(1)

THOMAS ROBERT LACOVARA,

v.

Forfeiture

18 U.S.C. § 924(d)

Defendant.

28 U.S.C. § 2461(c)

UNDER SEAL

THE GRAND JURY CHARGES:

COUNT 1 (Felon in Possession of a Firearm)

On or about January 23, 2016, in the District of Oregon, defendant **THOMAS**ROBERT LACOVARA, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, specifically:

- (1) Grand Theft 3rd Degree, in the Circuit Court of the Eleventh Judicial Circuit in and for Miami-Dade County, Florida, Case Number F07-010858, on or about May 15, 2007;
- (2) Grand Theft 3rd Degree in the Circuit Court of the Eleventh Judicial Circuit in and for Miami-Dade County, Florida, Case Number F07-002629, on or about March 15, 2007;
- (3) Dealing in Stolen Property and False Verification of Ownership, in the Criminal Division of the Circuit Court of the Fifth Judicial Circuit in

- and for Palm Beach County, Florida, Case Number 05CF007538A02, on or about April 27, 2006; and
- (4) Attempt to Purchase Cocaine, in the Circuit Court of the Eleventh Judicial Circuit in and for Miami-Dade County, Florida, Case Number F06-003464, on or about February 21, 2006;

did knowingly and unlawfully possess the following firearm: a Glock 9mm pistol, which firearm had previously been shipped or transported in interstate or foreign commerce;

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

FORFEITURE ALLEGATION

Upon conviction of the offense alleged in Count 1 of this Indictment, defendant 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), any firearm and ammunition involved in that offense, including without limitation: a Glock 9mm pistol.

Dated this 2/ day of September 2016.

A TRIJE BILL

GRAND JURY FOREPERSON

Presented by:

BILLY J. WILLIAMS

United States Attorney

NATHAN J. LICHVARCIK

Assistant United States Attorney

Indictment