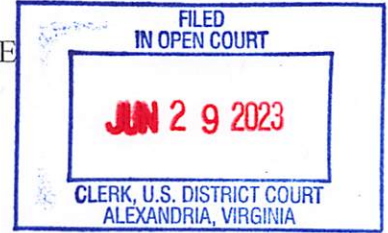


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

ROBERT JAMES FISCHER, also known
as "ZACHARY BROWN" and "BOBBY"

and

CHEERISH NOEL TAYLOR, also known
as "Cece"

Defendants.

Case No. 1:23-CR-112

Count 1: 21 U.S.C. §§ 841(a)(1) and 846
Conspiracy to Distribute
Methamphetamine, Heroin, and Para-
Fluorofentanyl

Forfeiture Notice

INDICTMENT

June 2023 Term — Alexandria, Virginia

COUNT ONE

*(Conspiracy to Distribute Controlled Substances, Including 50 Grams or More of
Methamphetamine, Heroin, and para-Fluorofentanyl)*

THE GRAND JURY CHARGES THAT:

From at least as early as January of 2021, and continuing thereafter up to and including June of 2023, the exact dates being unknown, in Manassas, Virginia, within the Eastern District of Virginia, and elsewhere, the defendants ROBERT JAMES FISCHER, also known as "Zachary Brown" and "Bobby," and CHEERISH NOEL TAYLOR, also known as "Cece," did knowingly and intentionally combine, conspire, confederate, and agree with each other, and with other persons known and unknown to the Grand Jury, to knowingly and intentionally distribute:

1. a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C);
2. a mixture and substance containing a detectable amount of N-(4-fluorophenyl)-N-[1-(2-phenylethyl)-4-piperidinyl]propanamide, commonly referred to as para-fluorofentanyl, an analogue of fentanyl and a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C); and
3. fifty grams or more of methamphetamine, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

(All in violation of Title 21, United States Code, Section and 846)

FORFEITURE NOTICE

THE GRAND JURY FURTHER FINDS PROBABLE CAUSE FOR FORFEITURE, AS DESCRIBED BELOW:

The GRAND JURY HEREBY FINDS probable cause that the property described in this NOTICE OF FORFEITURE is subject to forfeiture pursuant to the statutes described:

Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, the defendants are hereby notified that upon conviction of either of the controlled substance offenses alleged in Count 1 of the Indictment, the defendants, ROBERT JAMES FISCHER and CHEERISH NOEL TAYLOR shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a), the following: (1) any property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as the result of such violation; and (2) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violation.

Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, the defendants are hereby notified that if convicted of any of the violations set forth in this Indictment, the defendants shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in or used in the commission of the offense.

//

//

//

//

//

Pursuant to 21 U.S.C. 853(p), the defendants shall forfeit substitute property, if, by any act or omission of the defendants, the property referenced above cannot be located upon the exercise of due diligence; has been transferred, sold to, or deposited with a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

The property subject to forfeiture includes, but is not limited to: (a) \$1,011 in U.S. currency seized from the defendants in Phoenix, AZ on June 5, 2023; (b) all cryptocurrency, cryptocurrency storage devices, and all funds represented by any cryptocurrency seed phrases, QR codes, and other cryptocurrency access methods recovered from the defendants in Phoenix, AZ on June 5, 2023; (c) a Visa CashApp debit card and all funds contained thereon seized from the defendants in Phoenix, AZ on June 5, 2023; and (d) all ammunition seized from the defendants in Phoenix, AZ on June 5, 2023.

(In accordance with Title 21, United States Code, Section 853; Title 18, United States Code 924(d)(1); Title 28, United States Code 2461(c); and Federal Rule of Criminal Procedure 32.2(a))

**Pursuant to the E-Government Act,
The original of this page has been filed
under seal in the Clerk's Office**

Foreperson

Jessica D. Aber
United States Attorney

By:



Heather D. Call
Assistant United States Attorney