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UNITED STATES OF AMERICA,

Plaintiff,

Case No. **24-CR-088**

v.

[18 U.S.C. §§ 229(a) & 229F]

JAMES MORGAN, a/k/a "KARACTUS  
BLOME,"

Defendant.

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**INDICTMENT**

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**THE GRAND JURY CHARGES THAT:**

On or about December 21, 2023, in the State and Eastern District of Wisconsin,

**JAMES MORGAN, a/k/a "KARACTUS BLOME,"**

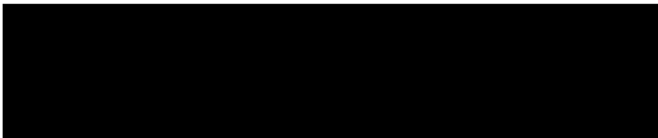
knowingly retained, owned, and possessed, and attempted to retain, own, and possess a chemical weapon, namely precursors (calcium hypochlorite and hydrochloric acid), which when combined creates a toxic chemical, that is, chlorine and chlorine gas, not intended for peaceful, protective, unrelated military, and law enforcement purposes, as described in 18 U.S.C. § 229F(7).

In violation of Title 18, United States Code, Sections 229(a) and 229F.

**FORFEITURE ALLEGATIONS**


Upon conviction of the possession of a chemical weapon offense, in violation of 18 U.S.C. § 229(a), as set forth in this Indictment, the defendant shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 229B: (1) any property, real or personal, owned, possessed, or used by a person involved in the offense charged in this Indictment; (2) any property constituting, or derived from, and proceeds the person obtained, directly or indirectly, as a result of the violation of 18 U.S.C. § 229(a), charged in this Indictment; and (3) any property used in any manner or part, to commit, or to facilitate the commission of, such offense.

If any of the property described above, as a result of any act or omission by the defendant, cannot be located upon the exercise of due diligence; has been transferred or sol to, or deposited with, a third person; has been placed beyond the Court's jurisdiction; has been subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 229B(b)(1).



FOREPERSON

Dated: 4-23-24

*fr*   
GREGORY J. HAANSTAD  
United States Attorney