

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT  
N-06-5

UNITED STATES OF AMERICA :  
 :  
 : No. \_\_\_\_\_  
 :  
 v. :  
 :  
 :  
 SHANA MOSELEY : Violation: 18 U.S.C. § 1623  
 : (False Declarations Before Grand Jury)  
 :

**INDICTMENT**

The Grand Jury charges:

**COUNT ONE**

1. On or about the 23rd day of October, 2007, in the District of Connecticut, SHANA MOSELEY, the defendant herein, while under oath and testifying in a proceeding before Grand Jury N-06-5, a Grand Jury of the United States in the District of Connecticut, knowingly did make a false material declaration, that is to say:

2. At the time and place aforesaid, the Grand Jury was conducting an investigation relating to the possession of a Glock Model 21, .45 caliber semi-automatic pistol, bearing the serial number GCB284, by a convicted felon, Thomas Julius, in or around February of 2007 in New Haven, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(e)(1).

3. It was material to said investigation that the Grand Jury identify all persons with knowledge of the Glock Model 21, .45 caliber semi-automatic pistol, bearing the serial number

GCB284, at our about the time of February 2007, including all persons with knowledge concerning the ownership, possession, use and location of the firearm.

4. At the time and place alleged, SHANA MOSELEY, the defendant herein, appearing as a witness under oath at a proceeding before the Grand Jury, knowingly made the following declarations regarding her knowledge of the Glock Model 21, .45 caliber semi-automatic pistol, bearing the serial number GCB284, in response to questions with respect to the material matters alleged in Paragraph 3 as follows:

Q: Okay. And you stated that you did not know that there was a gun in the bedroom?

A: No.

Q: Did you recognize the gun in picture 10, the firearm on the right side of the picture?

A: No.

Q: Is that your gun?

A: No.

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Q: Now you indicated that you had never- - the photograph, you saw the photograph that [the Assistant United States Attorney] showed you of the firearm?

A: Uh-hum.

Q: You've never seen that firearm before?

A: No.

Q: You've never touched that firearm before?

A: No.

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Q: And just so it's clear, this is Grand Jury Exhibit 10, the firearm is on the right.  
You've never seen or touched that firearm, correct?

A: No.

\*\*\*\*

Q: Okay. Because one of the things, when you were testifying earlier, I believe you said, when [the Assistant United States Attorney] asked you, Have you ever seen the firearm, you said, That morning, no. Had you ever seen that firearm?

A: No. What do you mean? I thought she was saying to me- - I thought she was saying that morning, Did I see him put it underneath, if that's what she's talking about I'm thinking. Because I didn't see- - **I seen it that morning when the police came in, but I'd never seen it before that morning.**

Q: Okay. So the first time that you ever saw this firearm - -

A: **The first time I ever seen it was when the police was like- -**

Q: You saw it after the police had arrested Mr. Julius?

A: Yes. Is that more - -

Q: I just wanted to clarify.

5. The aforesaid underscored testimony of SHANA MOSELEY, the defendant herein, as she then and there well knew and believed, was false in that she had seen and had touched the firearm in question.

All in violation of 18 U.S.C. § 1623.

A TRUE BILL,

\_\_\_\_\_/s/\_\_\_\_\_  
\_\_\_\_\_

FOREPERSON

\_\_\_\_\_/s/\_\_\_\_\_  
KEVIN J. O'CONNOR  
UNITED STATES ATTORNEY

\_\_\_\_\_/s/\_\_\_\_\_  
ANTHONY E. KAPLAN  
SUPERVISORY ASSISTANT UNITED STATES ATTORNEY

\_\_\_\_\_/s/\_\_\_\_\_  
SARAH P. KARWAN  
ASSISTANT UNITED STATES ATTORNEY