

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
DUBLIN DIVISION

UNITED STATES OF AMERICA

v.

GEORGE LO,
NICHOLAS LO, and
CHEIKH HASSANE TOURE, a/k/a
"Hassan"

) INDICTMENT NO. **CR320 004**
)
) 18 U.S.C. § 371
) Conspiracy
)
) 49 U.S.C. § 46306(b)(5)(A)
) Owning an Unregistered Aircraft
) that was Operated, Attempted to
) be Operated, or Allowed to be
) Operated by Another Person
)
) 49 U.S.C. § 46306(b)(7)
) Serving or Attempting to Serve
) as an Airman without an
) Airman's Certificate

FILED
U.S. DISTRICT COURT
SAVANNAH DIV.
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THE GRAND JURY CHARGES THAT:

COUNT ONE
Conspiracy
18 U.S.C. § 371

Beginning sometime on or before July 13, 2019, the exact date being unknown, and continuing until August 26, 2019, in Telfair County and elsewhere within the Southern District of Georgia, the defendants,

GEORGE LO,
NICHOLAS LO and
CHEIKH HASSANE TOURE, a/k/a "Hassan,"

did knowingly combine, conspire, confederate, and agree with each other and others, both known and unknown, to commit the following offenses against the United States:

to own an aircraft eligible for registration pursuant to Title 18 United

States Code § 44102, and to knowingly and willfully operate or attempt to operate the aircraft when it had not been registered under Title 18, United States Code, Section 44103, in violation of Title 49, United States Code, Section 46306(b)(5)(A); and

to knowingly and willfully serve or attempt to serve as an airman without first obtaining an airman's certificate authorizing an individual to serve in that capacity, in violation of Title 49, United States Code, Section 46306(b)(7).

OVERT ACTS

In furtherance of the conspiracy and to effect the objects thereof, Defendants and others, both known and unknown, committed one or more of the below-listed overt acts, among others:

- (1) Sometime prior to July 13, 2019, the exact date being unknown, Defendants **GEORGE LO** and **NICHOLAS LO** obtained and assembled a Storm Drone 4 kit-built Unmanned Aircraft System, which was required to be registered pursuant to Title 18, United States Code, Sections 44102 and 44103, and Title 14, Code of Federal Regulations, Section 107;
- (2) Defendants **GEORGE LO** and **NICHOLAS LO** failed to register the Unmanned Aircraft System as required;
- (3) On over 100 occasions between July 13, 2019 and August 25, 2019,

Defendants **GEORGE LO** and **NICHOLAS LO** discussed using the unregistered Unmanned Aircraft System to deliver contraband to the Telfair State Prison;

- (4) Sometime on or prior to July 13, 2019, Defendants **NICHOLAS LO** and **CHEIKH HASSANE TOURE** practiced flying the unregistered Unmanned Aircraft System;
- (5) At no point did Defendants **NICHOLAS LO** or **CHEIKH HASSANE TOURE** possess an airman's certificate authorizing them to operate an Unmanned Aircraft System; and
- (6) On August 26, 2019, Defendants **NICHOLAS LO** and **CHEIKH HASSAN TOURE** travelled to within 100 yards of the Telfair State Prison with the unregistered Unmanned Aircraft System, a RadioLink AT9S UAS controller, a Spektrum SPMVM435 Video Monitor with DVR, a headset for a Spektrum Video Monitor, 14 cellular telephones, 74 grams of tobacco, a digital scale, a pair of earbud headphones, and firearm ammunition.

All done in violation of Title 18, United States Code, Section 371.

COUNT TWO

Owning an Unregistered Aircraft that was Operated, Attempted to be Operated, or Allowed to be Operated by Another Person
49 U.S.C. § 46306(b)(5)(A)

On or about August 26, 2019, in Telfair County, within the Southern District of Georgia, the defendants,

**GEORGE LO and
NICHOLAS LO,**

owned an aircraft eligible for registration pursuant to Title 18, United States Code Section 44102, to wit: a Storm Drone 4 kit-built Unmanned Aircraft System, and knowingly and willfully operated, attempted to operate, and allowed another person to operate the aircraft when it had not been registered under Title 18, United States Code, Section 44103.

All in violation of Title 49, United States Code, Section 46306(b)(5)(A).

COUNT THREE

Serving or Attempting to Serve as an Airman without an Airman's Certificate
49 U.S.C. § 46306(b)(7)

On or about August 26, 2019, in Telfair County, within the Southern District of Georgia, the defendants,

**NICHOLAS LO and
CHEIKH HASSANE TOURE, a/k/a "Hassan,"**

knowingly and willfully served or attempted to serve as an airman, by operating an Unmanned Aircraft System, without first obtaining an airman's certificate authorizing an individual to serve in that capacity.

All in violation of Title 49, United States Code, Section 46306(b)(7).

FORFEITURE ALLEGATION

The allegations contained in Counts One through Three of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 49, United States Code, Section 46306(d).

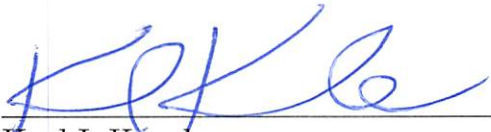
Pursuant to Title 49, United States Code, Section 46306(d), upon conviction for any offense set forth in this Indictment, the defendants

**GEORGE LO, NICHOLAS LO, and CHEIKH HASSANE TOURE, a/k/a
"Hassan,"**


shall forfeit to the United States any aircraft whose use is related to a violation of Title 49, United States Code, Section 46306(b), or to aid or facilitate a violation, regardless of whether they were charged for any such violation, including but not limited to a Storm Drone 4 kit-built Unmanned Aircraft System.

A True Bill

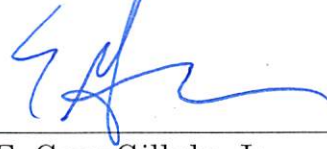
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