

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

UNITED STATES OF AMERICA)
)
 v.)
)
 JASON STARR and)
 DARIN STARR)
)

CR. NO. 1:21cr 500-RAH-KFP
[18 U.S.C. § 1958]

INDICTMENT

The Grand Jury charges:

COUNT 1

(Use of Interstate Commerce Facilities in the Commission of a Murder-for-Hire)

Between on or about September 7, 2017, to on or about November 27, 2017, in Coffee County, within the Middle District of Alabama, and elsewhere, the defendants,

JASON STARR and
DARIN STARR

conspired to travel in interstate commerce and cause another to travel in interstate commerce, from the State of Texas to the State of Alabama, and use an instrument of interstate commerce and cause another to use an instrument of interstate commerce, with the intent that the murder of ^{*Sara}~~Sarah~~ Starr be committed, in violation of the laws of the State of Alabama, to wit: Alabama Code Sections 13A-6-2, and 13A-2-23, as consideration for the receipt of, and as consideration for a promise and agreement to pay, things of pecuniary value, to wit: a 2016 Triumph motorcycle, and U.S. currency, resulting in the death of the said ^{*Sara}~~Sarah~~ Starr, all in violation of Title 18, United States Code, Section 1958.

FORFEITURE ALLEGATION

A. The allegations contained in Count 1 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 924 and Title 28, United States Code, Section 2461(c).

B. Upon conviction of the offenses in violation of Title 18, United States Code, Section 1958, set forth in Count 1 Indictment, the defendants,

JASON STARR and
DARIN STARR,

shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 924 and Title 28, United States Code, Section 2461(c), any and all property constituting or derived from proceeds defendant obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offenses in violation of Title 18, United States Code, Section 1958.

C. If any of the property described in this forfeiture allegation, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

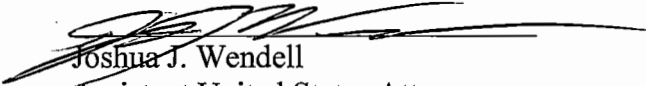
All pursuant to Title 18, United States Code, Section 924(d)(1) by Title 28, United States Code, Section 2461(c).


A TRUE BILL:



Foreperson

SANDRA J. STEWART
ACTING UNITED STATES ATTORNEY


Joshua J. Wendell
Assistant United States Attorney


Eric M. Counts
Assistant United States Attorney

*Indictment corrected pursuant to Motion to Correct/Amend (Doc. 12) and subsequent Order (Doc. 13) regarding a clerical error.