

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

Plaintiff,

v.

KEVIN MCCA  
CHARLES DUCKSWORTH, JR.,  
SHANELLE MCCOY, and  
LAKISHA DUCKSWORTH,

Defendants.

Case No. 23-CR-

**23-CR-008**

[18 U.S.C. §§ 922(g)(1), 924(a)(8),  
924(c), 924(j), 1001(a)(2), 1111(a),  
1114, & 2(a); 21 U.S.C. §§ 841(a)(1)  
& 841(b)(1)(D)]

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**INDICTMENT**

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**COUNT ONE**  
(First-Degree Murder)

**THE GRAND JURY CHARGES THAT:**

On or about December 9, 2022, in the State and Eastern District of Wisconsin,

**KEVIN MCCA and CHARLES DUCKSWORTH, JR.,**

with premeditation and malice aforethought, did unlawfully kill A.C., a United States Postal Service employee, while A.C. was engaged in and on account of the performance of his official duties.

In violation of Title 18, United States Code, Sections 1111(a), 1114, and 2(a).

**COUNT TWO**

(Discharge a Firearm During a Crime of Violence)

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 9, 2022, in the State and Eastern District of Wisconsin,

**KEVIN MCCAIA and CHARLES DUCKSWORTH, JR.**

knowingly discharged a firearm during and in relation to a crime of violence, that is First-Degree Murder as charged in Count One, causing the death of another.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(iii), 924(j), and 2(a).

**COUNT THREE**  
(Material False Statement)

**THE GRAND JURY FURTHER CHARGES THAT:**

1. On or about December 12, 2022, in the State and Eastern District of Wisconsin,

**SHANELLE MCCOY**

did willfully and knowingly make a materially false, fraudulent, and fictitious statement and representation in a matter within the jurisdiction of the executive branch of the government of the United States.

2. McCoy made the false statement and representation during an interview with law enforcement officers conducting an investigation of first-degree murder, in violation of 18 U.S.C. §§ 1111(a) and 1114; and discharge of a firearm during a crime of violence, in violation of 18 U.S.C. § 924(c). In particular, McCoy stated that she was driving her vehicle, an Audi Q5 SUV, for purposes of her employment on December 9, 2022.

3. McCoy's statement was false because, as she well knew, she drove another individual's vehicle, an Acura, for purposes of her employment on December 9, 2022, and she allowed Kevin McCaa to use her Audi Q5 SUV on December 9, 2022.

All in violation of Title 18, United States Code, Section 1001(a)(2).

**COUNT FOUR**

(Felon in Possession of Ammunition)

**THE GRAND JURY FURTHER CHARGES THAT:**

1. On or about December 27, 2022, in the State and Eastern District of Wisconsin,

**KEVIN MCCAIA,**

knowing he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed ammunition which, prior to his possession of it, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

2. The ammunition is further described as follows:

- a. sixteen (16) Hornady Critical Defense .40 caliber rounds;
- b. three (3) Winchester .40 caliber rounds;
- c. one (1) PMC brand .40 caliber round;
- d. one (1) WIN 9mm round;
- e. three (3) LC21 rifle rounds; and
- f. one (1) Blazer 9mm round.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

**COUNT FIVE**

(Possession with Intent to Distribute Marijuana)

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 27, 2022, in the State and Eastern District of Wisconsin,

**CHARLES DUCKSWORTH, JR.**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D).

**COUNT SIX**

(Possession of a Firearm in Furtherance of Drug Trafficking)

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 27, 2022, in the State and Eastern District of Wisconsin,

**CHARLES DUCKSWORTH, JR.**

knowingly possessed a firearm during and in furtherance of a drug trafficking crime, that is

Possession with Intent to Distribute Marijuana, as charged in Count Five.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

**COUNT SEVEN**  
(Material False Statements)

**THE GRAND JURY FURTHER CHARGES THAT:**

1. On or about December 28, 2022, and on or about January 4, 2023, in the State and Eastern District of Wisconsin,

**LAKISHA DUCKSWORTH**

did willfully and knowingly make materially false, fraudulent, and fictitious statements and representations in a matter within the jurisdiction of the executive branch of the government of the United States.

2. Lakisha Ducksworth made the false statements and representations during interviews with law enforcement officers conducting an investigation of first-degree murder, in violation of 18 U.S.C. §§ 1111(a) and 1114; and discharge of a firearm during a crime of violence, in violation of 18 U.S.C. § 924(c). In particular, Lakisha Ducksworth stated that her residential surveillance equipment was not functioning on or about December 2, 2022, and that she had not sent Charles Ducksworth, Jr. video footage from her residential surveillance system.

3. Lakisha Ducksworth's statements and representations were false because, as she well knew, her surveillance equipment was functioning on December 2, 2022, and she sent a text message on or about December 6, 2022, to Charles Ducksworth, Jr. containing video footage from her residential surveillance system of postal worker A.C. delivering mail to her residence.

All in violation of Title 18, United States Code, Section 1001(a)(2).

## FORFEITURE NOTICE

1. Upon conviction of the offense alleged in Counts Two, Four, and Six, defendants Kevin McCaa and Charles Ducksworth Jr. shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the offenses of conviction, including, but not limited to:

- a. a black Glock 19 Gen4 9mm semiautomatic handgun, bearing serial number BCRP667, without a magazine;
- b. a Glock brand 15-round capacity 9mm magazine;
- c. a black Pro Mag brand 21-round capacity 9mm magazine;
- d. a Glock 43X 9mm semi-automatic handgun, bearing serial number BSRZ292, with an extended 50-round drum magazine, loaded with fifteen rounds of WIN ammunition, one round of Blazer 9mm ammunition; and twenty-eight (28) rounds of GFL 9mm ammunition;
- e. sixteen (16) Hornady Critical Defense .40 caliber rounds;
- f. three (3) Winchester .40 caliber rounds;
- g. one (1) PMC brand .40 caliber round;
- h. one (1) WIN 9mm round;
- i. three (3) LC21 rifle rounds;
- j. one (1) Blazer 9mm round; and
- k. a box of 46 rounds of Winchester 9mm cartridges.

2. Upon conviction of the controlled substance offense alleged in Count Five, defendant Charles Ducksworth Jr. shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the violation and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violation, including but not limited to:

- a. \$2,282 in U.S. currency recovered from 18XX North 13<sup>th</sup> Street,

Milwaukee, Wisconsin, on December 27, 2022;

- b. \$2,370 in U.S. currency recovered from 45XX West Eggert Place, Milwaukee, Wisconsin, on December 27, 2022; and
- c. a sum of money representing the amount of proceeds obtained as a result of the offense.

3. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; 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 subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to 21 U.S.C. § 853(p).

A TRUE BILL:

[REDACTED]

FOREPERSON

Dated: 1/18/23

  
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GREGORY J. HAANSTAD  
United States Attorney