

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

**INDICTMENT FOR VIOLATIONS OF THE  
FEDERAL CONTROLLED SUBSTANCES ACT AND GUN CONTROL ACT**

<b>UNITED STATES OF AMERICA</b>	*	<b>CRIMINAL DOCKET NO:</b>
<b>v.</b>	*	<b>SECTION:</b>
<b>ROGER WILLIAMS</b>	*	<b>VIOLATIONS: 21 U.S.C. § 841(a)(1)</b>
	*	<b>18 U.S.C. § 924(c)</b>
	*	<b>18 U.S.C. § 922(g)(1)</b>
	* * *	

The Grand Jury charges that:

**COUNT 1**

On or about January 22, 2008, in the Eastern District of Louisiana, the defendant, **ROGER WILLIAMS** did knowingly and intentionally possess with the intent to distribute fifty (50) grams or more of cocaine base (“crack”), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**COUNT 2**

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On or about January 22, 2008, in the Eastern District of Louisiana, the defendant, **ROGER WILLIAMS** did knowingly and intentionally possess with intent to distribute a quantity of cocaine

hydrochloride, a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT 3**

On or about January 22, 2008, in the Eastern District of Louisiana, the defendant, **ROGER WILLIAMS** did knowingly possess a firearm to wit: a Bryco Arms T380, .380 caliber pistol, bearing serial number 1465119, in furtherance of a drug trafficking crime for which he may be punished in a court of the United States, to wit: possession with intent to distribute cocaine base (“crack”) and cocaine hydrochloride, both Schedule II narcotic drug controlled substance, as charged in Counts 1 and 2 in violation of Title 21, United States Code, Sections 841(a)(1); all in violation of Title 18 United States Code, Section 924(c).

**COUNT 4**

\_\_\_\_\_ On or about January 22, 2008, in the Eastern District of Louisiana, the defendant, **ROGER WILLIAMS** having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, to wit; a conviction on or about October 15, 2003, in the Parish of Jefferson, 24<sup>th</sup> Judicial District, State of Louisiana, Case Number 03-3590 for Possession of Cocaine, in violation of La.R.S. 15:529.1, did knowingly possess in and affecting commerce a firearm, to wit: a Bryco Arms T380, .380 caliber pistol, bearing serial number 1465119, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**COUNT 5**

\_\_\_\_\_ On or about May 2, 2008, at approximately 9:40 p.m., in the Eastern District of Louisiana, the defendant, **ROGER WILLIAMS** did knowingly and intentionally possess with intent to

distribute fifty (50) grams or more of cocaine base (“crack”), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841 (b)(1)(A).

**COUNT 6**

\_\_\_\_\_ On or about May 2, 2008, at approximately 11:45 p.m., in the Eastern District of Louisiana, the defendant, **ROGER WILLIAMS** did knowingly and intentionally possess with intent to distribute fifty grams (50) or more of cocaine base (“crack”), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(B)(1)(A).

**NOTICE OF DRUG FORFEITURE**

1. The allegations of Counts 1, 2, 5, and 6 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 21, United States Code, Section 853.

2. As a result of the offenses alleged in Counts 1, 2, 5, and 6 the defendant, **ROGER WILLIAMS**, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds the 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 violations alleged in Counts 1, 2, 5, and 6 of this Indictment.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;

- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

All in violation of Title 21, United States Code, Section 853.

### **NOTICE OF GUN FORFEITURE**

1. The allegations of Counts 3 and 4 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 924 (d)(1) and Title 28, United States Code, Section 2461(c).

2. As a result of the offenses alleged in Counts 3 and 4 , the defendant, **ROGER WILLIAMS**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461, any firearm or ammunition, which was involved in or used in a knowing violation of Title 18, United States Code, Sections 922(g) or 924(c)(1)(A).

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 924(d)(1).

A TRUE BILL:

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F O R E P E R S O N

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JIM LETTEN #8517  
UNITED STATES ATTORNEY

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JAN MASELLI MANN #9020  
First Assistant United States Attorney

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GINA S. VANN  
Assistant United States Attorney

New Orleans, Louisiana  
May 22, 2008