

FELONY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

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

UNITED STATES OF AMERICA

v.

KENDELL JACKSON

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CRIMINAL DOCKET NO.:

SECTION:

VIOLATIONS: 21 U.S.C. § 841(a)(1)
18 U.S.C. § 924(c)(1)(A)
18 U.S.C. § 922(g)(1)
18 U.S.C. § 924(a)(2)
18 U.S.C. § 2

The Grand Jury charges that:

COUNT 1

On or about February 22, 2008, in the Eastern District of Louisiana, the defendant, **KENDELL JACKSON**, did knowingly and intentionally possess with intent to distribute fifty (50) grams or more of cocaine base ("crack") and a quantity of cocaine hydrochloride, both Schedule II narcotic drug controlled substances, and a quantity of marijuana, a Schedule I drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A), (b)(1)(C) and (b)(1)(D).

COUNT 2

On or about February 22, 2008, in the Eastern District of Louisiana, the defendant, **KENDELL JACKSON**, did knowingly possess a firearm, to wit: a Smith and Wesson, .38 caliber Airweight pistol, bearing serial number BSA0635 and a Beretta, model 84 BB 9mm pistol, bearing serial number D07165, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: possession with the intent to distribute fifty (50) grams or more of cocaine base ("crack") and a quantity of cocaine hydrochloride and marijuana as alleged in Count 1, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 18, United States Code, Section 924(c)(1)(A) and Title 18, United States Code, Section 2.

COUNT 3

On or about February 22, 2008, in the Eastern District of Louisiana, the defendant, **KENDELL JACKSON**, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: a conviction on June 3, 1999, in St. John the Baptist Parish Criminal District Court, Case No. 96124, for drug racketeering, in violation of LA. R.S. 15:1353, did knowingly possess in and affecting interstate commerce, a firearm, to wit: a Smith and Wesson, .38 caliber Airweight pistol, bearing serial number BSA0635 and a Beretta, model 84 BB 9mm pistol, bearing serial number D07165; all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2) and Title 18, United States Code Section 2.

NOTICE OF DRUG FORFEITURE

1. The allegation of Count 1 of this Indictment is 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 offense alleged in Count 1, the defendant, **KENDELL JACKSON**, 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 violation 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 violation alleged in Count 1 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 defendant(s):

- 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 21, United States Code, Section 853.

NOTICE OF GUN FORFEITURE

1. The allegations of Counts 2 and 3 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 2 and 3, the defendant, **KENDELL JACKSON**, 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 924(c)(1)(A) and 922(g), as alleged in Counts 2 and 3 of the 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 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.

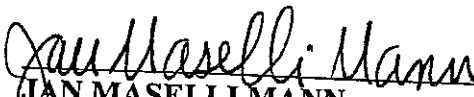
All in violation of Title 18, United States Code, Sections 924(c)(1)(A), 922(g), and 924(d)(1).

A TRUE BILL:

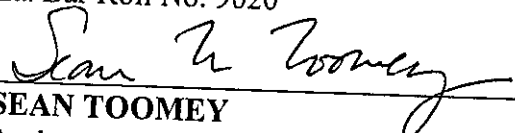
FOREPERSON



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New Orleans, Louisiana
June 20, 2008