

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

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

UNITED STATES OF AMERICA	*	CRIMINAL DOCKET NO.
v.	*	SECTION:
RYAN KEELER	*	VIOLATION: 18 U.S.C. §922(g)(1)
	*	18 U.S.C. §924(a)(2)
	*	18 U.S.C. §924(c)
	*	21 U.S.C. §841(a)(1)
	* * *	

The Grand Jury charges that:

COUNT 1

On or about January 29, 2008, in the Eastern District of Louisiana, the defendant, **RYAN KEELER**, did knowingly and intentionally possess with the intent to distribute 100 grams or more of a substance containing a detectable amount of heroin, a Schedule I drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 2

On or about January 29, 2008, in the Eastern District of Louisiana, the defendant, **RYAN KEELER**, having previously been convicted of crimes punishable by imprisonment for a term exceeding one year, to wit: a conviction on or about March 19, 2003, in case number 02-302 “B” in the United States District Court for the Eastern District of Louisiana, for distribution of at least five (5) grams of cocaine base (“crack”) in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and possession with intent to distribute a quantity of cocaine hydrochloride in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), did knowingly possess in and affecting commerce firearms, to wit: a Smith and Wesson .357, serial number CFJ8715; and a Jennings Bryco 58 .9mm, serial number 971889; all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 3

On or about January 29, 2008, in the Eastern District of Louisiana, the defendant, **RYAN KEELER**, did knowingly possess firearms, to wit: a Smith and Wesson .357, serial number CFJ8715; and a Jennings Bryco 58 .9mm, serial number 971889; in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: possession with intent to distribute 100 grams or more of heroin, 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).

NOTICE OF DRUG FORFEITURE

1. The allegation of Count One (1) 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 offense alleged in Count One (1), **RYAN KEELER**, 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 Count One (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 Two (2) through Three (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 Two (2) through Three (3), defendant(s), **RYAN KEELER**, 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, Section(s) 922 and or 924(c)(1), as alleged in Counts Two (2) and Three (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 922 and/or 924(c)(1) and
924(d)(1).

A TRUE BILL:

F O R E P E R S O N

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New Orleans, Louisiana
February _____, 2008