

### UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

### INDICTMENT FOR VIOLATIONS OF THE FEDERAL CONTROLLED SUBSTANCES ACT



UNITED STATES OF AMERICA

CRIMINAL DOCKET NP:2 - 188 SECTION: SECTION: SECTION MAG. 3

RANDY DIXON

VIOLATIONS: 21 U.S.C. § 846

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(C)

The Grand Jury charges that:

### **COUNT 1**

Beginning at a time unknown, but prior to March 5, 2012, and continuing until on or about May 3, 2012, in the Eastern District of Louisiana, and elsewhere, the defendant, RANDY DIXON. did knowingly and intentionally combine, conspire, confederate and agree with other persons known and unknown to the Grand Jury, to distribute and to possess with the 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); all in violation of Title 21, United States Code, Section 846.

Doc. No.

### **COUNT 2**

On or about March 5, 2012, in the Eastern District of Louisiana, the defendant, RANDY DIXON, did knowingly and intentionally 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 March 27, 2012, in the Eastern District of Louisiana, the defendant, RANDY DIXON, did knowingly and intentionally 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 4**

On or about May 3, 2012, in the Eastern District of Louisiana, the defendant, RANDY DIXON, did knowingly and intentionally possess with intent to distribute a quantity of cocaine hydrochloride, a Schedule II narcotic drug controlled substance, and a quantity of 3, 4-methylenedioxymethamphetamine (MDMA, also known as "Ecstasy"), a Schedule I drug controlled substance; all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

### **NOTICE OF FORFEITURE**

1.) The allegations of Counts 1 through 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 21, United States Code, Section 853.

- 2.) As a result of the offense alleged in Counts 1 through 4, defendant, RANDY DIXON, 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 or to facilitate the commission of the violation alleged in Counts 1 through 4 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 acts or omissions of the defendant, RANDY DIXON:
  - 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.

A TRUE BILL:

FOREPERSON

IM LETTEN

UNITED STATES ATTORNEY

Bar Roll No. 8517

JAN MASELLI MANN

First Assistant United States Attorney

Bar Roll No. 9020

ANDRE' JONES

Assistant United States Attorney

Bar Roll No. 23502

New Orleans, Louisiana

May 11, 2012

No

# UNITED STATES DISTRICT COURT

Eastern District of Louisiana Criminal Division

THE UNITED STATES OF AMERICA vs.

### RANDY DIXON

## FOR VIOLATIONS OF THE FEDERAL CONTROLLED SUBSTANCES ACT AND FEDERAL GUN CONTROL ACT

VIOLATION(S): 21 U.S.C. § 846; 21 U.S.C. § 841(a)(1); 21 U.S.C. § 841(b)(1)(C)

A true bill.

Foreman

Filed in open court this

day, of \_\_\_\_\_A.D. 2012.

Clerk

Bail, \$

ANDRE' JONES, Assistant United States Attorney