

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
DELTA DIVISION

FEB 09 2024
By: TAMMY H. DOWNS, CLERK
DEP CLERK

UNITED STATES OF AMERICA) No.: 2:24CR 0001 LPR
)
v.) Title 21, U.S.C. §§ 331(k), 333(a)(1)
) Notice of Forfeiture
FAMILY DOLLAR STORES, LLC)

INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT 1

(21 U.S.C. §§ 331(k), 333(a)(1))

On or about January 1, 2021, through January 14, 2022, in the Eastern District of Arkansas, and elsewhere, the defendant,

FAMILY DOLLAR STORES, LLC,

did adulterate and cause to become adulterated human and animal food, drugs, devices, and cosmetics, within the meaning of the Federal Food, Drug, and Cosmetic Act, 21 U.S.C. §§ 321(f)-(i), 342(a)(4), 351(a)(2)(A), and 361(c), while such articles were held for sale after shipment in interstate commerce. Specifically, the defendant **FAMILY DOLLAR STORES, LLC**, held human and animal food, drugs, devices, and cosmetics that were adulterated because they were prepared, packed, and held under insanitary conditions whereby they may have been contaminated with filth, and whereby they may have been rendered injurious to health, while such products were held for sale after shipment of one or more of their components in interstate commerce.

All in violation of Title 21, United States Code, Sections 331(k) and 333(a)(1).

FORFEITURE ALLEGATION

Upon conviction of a violation of Title 21, United States Code, Sections 331(k) and 333(a)(1), set forth in Count 1 of this Information, the defendant, **FAMILY DOLLAR STORES, LLC**, shall forfeit to the United States of America, under Title 21, United States Code, Sections 334 and 853(p) and Title 28, United States Code, Section 2461(c), all quantities of human and animal food, drugs, devices, and cosmetics held at the Family Dollar Distribution Center 202 from January 1, 2021 through January 14, 2022, which were deemed adulterated as a matter of federal law in the United States when held for sale in insanitary conditions after shipment in interstate commerce.


If any of the property subject to 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 party;
- 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 divided without difficulty;

it is the intent of the United States, under Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture, that is at least \$41,475,000.

Respectfully Submitted,

JONATHAN D. ROSS
United States Attorney



JULIE PETERS
Bar No. AR2000109
CAMERON C. MCCREE
Bar No. AR2007148
Assistant United States Attorneys
P. O. Box 1229
Little Rock, Arkansas 72203
julie.peters@usdoj.gov
cameron.mccree@usdoj.gov

AMANDA N. LISKAMM
Director

GABRIEL H. SCANNAPIECO
Assistant Director



PATRICK R. RUNKLE
Senior Litigation Counsel
ALISHA M. CROVETTO
Trial Attorney
Consumer Protection Branch
U.S. Department of Justice
450 Fifth Street, NW, Suite 6400S
Washington, DC 20001
202-305-7133
patrick.r.runkle@usdoj.gov