



INDICTMENT FOR VIOLATIONS OF THE FEDERAL CONTROLLED SUBSTANCES ACT AND THREATENING TO ASSAULT OR MURDER FEDERAL LAW ENFORCEMENT OFFICERS

UNITED STATES OF AMERICA

CRIMINAL NO.

V.

SECTION:

SHANNON CHRISTOPHER CEASAR, M.D.

VIOLATION: 21 U.S.C. § 846

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(C) 18 U.S.C. § 115(a)(1)(B)

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The Grand Jury charges that:

COUNT 1

Beginning at a time unknown, but prior to January 1, 2015, and continuing to on or about July 22, 2016, in the Eastern District of Louisiana and elsewhere, the defendant, SHANNON CHRISTOPHER CEASAR, M.D., did knowingly and intentionally combine, conspire, confederate, and agree with other persons known and unknown to the Grand Jury to distribute and to dispense, outside the scope of professional practice and not for a legitimate medical purpose, quantities of oxycodone, a Schedule II 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.

COUNT 2

On or about July 20, 2016, in the Eastern District of Louisiana, the defendant, SHANNON CHRISTOPHER CEASAR, M.D., did threaten to assault or murder federal law enforcement officers with the intent to impede, intimidate or interfere with such law enforcement officers while engaged in the performance of official duties, or with the intent to retaliate, in violation of Title 18, United States Code, Section 115(a)(1)(B).

NOTICE OF DRUG FORFEITURE

- 1. The allegation of Count 1 of this Indictment is re-alleged 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, **SHANNON CHRISTOPHER CEASAR, M.D.**, 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 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:
 - 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 THREATENING TO ASSAULT FEDERAL LAW ENFORECEMENT OFFICERS FORFEITURE

- 1. The allegations of Count 2 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, Sections 115 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).
- 2. As a result of the offenses alleged in Count 2, defendant, SHANNON CHRISTOPHER CEASAR, M.D., shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c), any and all property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Section 115. The government specifically provides notice of its intent to seek a personal money judgment against the defendant in the amount of the proceeds.
- 3. 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 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 115 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON

KENNETH ALLEN POLITE, JR. UNITED STATES ATTORNEY

SHIRIN HAKIMZADEH

Assistant United States Attorney

MYLES RANIER

Assistant United States Attorney Louisiana Bar Roll Number 30029

JORDAN GINSBERG

Assistant United States Attorney

New Orleans, Louisiana September 29, 2016