

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

INDICTMENT FOR VIOLATIONS OF
THE FEDERAL CONTROLLED SUBSTANCE ACT

UNITED STATES OF AMERICA	*	CRIMINAL DOCKET NO.
v.	*	SECTION:
CHANEL CARTER	*	VIOLATION: 18 U.S.C. § 2
a/k/a "Chanel Marcelin"		21 U.S.C. § 841(a)(1)
		21 U.S.C. § 846
HOXIE MARCELIN	*	
a/k/a "Marcelin Hoxie"		
a/k/a "Shawn Brown"	*	
a/k/a "Arthur Johnson"		

* * *

The Grand Jury charges that:

COUNT 1

Beginning at a time unknown and continuing through on or about March 28, 2012, in the Eastern District of Louisiana and elsewhere, the defendants, **CHANEL CARTER** and **HOXIE MARCELIN**, did knowingly and intentionally combine, conspire, confederate and agree with other persons known and unknown to the Grand Jury, to possess with intent to distribute 28 grams or more of cocaine base ("crack"), a Schedule II narcotic drug controlled substance, in

violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B); all in violation of Title 21, United States Code, Section 846.

COUNT 2

On or about March 28, 2012, in the Eastern District of Louisiana, the defendants, **CHANEL CARTER** and **HOXIE MARCELIN**, aiding and abetting each other and others, did knowingly and intentionally distribute a quantity of cocaine base (“crack”), a Schedule II narcotic drug controlled substance; all in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 3

On or about March 28, 2012, in the Eastern District of Louisiana, the defendants, **CHANEL CARTER** and **HOXIE MARCELIN**, aiding and abetting each other and others, did knowingly and intentionally possess with intent to distribute 28 grams or more of cocaine base (“crack”), a Schedule II narcotic drug controlled substance; all in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT 4

On or about March 28, 2012, in the Eastern District of Louisiana, the defendants, **CHANEL CARTER** and **HOXIE MARCELIN**, aiding and abetting each other and others, did knowingly and intentionally possess with intent to distribute a quantity of cocaine base (“crack”), a Schedule II narcotic drug controlled substance; all in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

NOTICE OF DRUG FORFEITURE

1. The allegations of Counts 1,2, 3 and 4 of this indictment are 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 offenses alleged in Counts 1,2, 3 and 4, the defendants, **CHANEL CARTER** and **HOXIE MARCELIN**, 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 defendants 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 Counts 1,2, 3 and 4 of this indictment.

3. If any of the above described forfeitable property, as a result of any act or omission of the defendants:

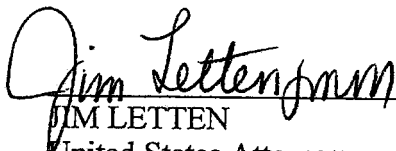
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot 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

A handwritten signature in cursive script, reading "Jim Letten", written over a horizontal line.

JIM LETTEN
United States Attorney
Louisiana Bar Roll Number 8517

A handwritten signature in cursive script, reading "Jan Maselli Mann", written over a horizontal line.

JAN MASELLI MANN
First Assistant U.S. Attorney
Louisiana Bar Roll Number 9020

A handwritten signature in cursive script, reading "Abram McGull, II", written over a horizontal line.

ABRAM MCGULL, II
Assistant United States Attorney

New Orleans, Louisiana
June 21, 2012