

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO. <u>10-66</u></b>
<b>v.</b>	:	<b>DATE FILED: <u>May 6, 2010</u></b>
<b>PIERRE E. JEAN-LOUIS,</b> a/k/a "Franz," a/k/a "Dodo"	:	<b>VIOLATIONS:</b> <b>18 U.S.C. § 1028(a)(1), (f) (attempting to produce an identification document without lawful authority - 1 count)</b> :
	:	<b>18 U.S.C. § 1951(a), (b)(2) (extortion under color of official right - 1 count)</b>
	:	<b>18 U.S.C. § 2 (aiding and abetting)</b>
	:	<b>Notice of forfeiture</b>
	:	

**SUPERSEDING INFORMATION**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

On or about December 5, 2009, in the Eastern District of Pennsylvania, and elsewhere, defendant

**PIERRE E. JEAN-LOUIS,  
a/k/a "Franz,"  
a/k/a "Dodo,"**

produced, attempted to produce, and aided and abetted the production of without lawful authority, a form of identification, that is, a Pennsylvania driver's license and driving permit in the name of P.A.R, a person known to the United States Attorney.

In violation of Title 18, United States Code, Section 1028(a)(1), (f).

**COUNT TWO**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

Between in or about 2008 and on or about January 13, 2010, in the Eastern District of Pennsylvania, and elsewhere, defendant

**PIERRE E. JEAN-LOUIS,  
a/k/a "Franz,"  
a/k/a "Dodo,"**

obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, aided and abetted, and attempted to do so, by extortion, in that the defendant JEAN-LOUIS obtained and attempted to obtain property, that is cash payments from individuals seeking Pennsylvania driver's licenses, with the consent of the individuals, under color of official right, part of which defendant JEAN-LOUIS paid to Alexander Steele, charged elsewhere, an official of PennDOT, which were not due Steele.

All in violation of Title 18, United States Code, Sections 1951(a), (b)(2) and 2.

## NOTICE OF FORFEITURE

### THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 1028(a)(1), (f) and 1951(a), set forth in this superseding information, defendant

**PIERRE E. JEAN-LOUIS,  
a/k/a “Franz,”  
a/k/a “Dodo,”**

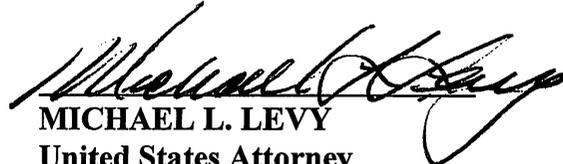
shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offenses.

2. 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, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(2)(B).

  
**MICHAEL L. LEVY**  
**United States Attorney**