

U.S. DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

2022 FEB 11 P 2:19

CAROL L. MICHEL
CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**INDICTMENT FOR VIOLATIONS OF THE
FEDERAL GUN CONTROL ACT AND
THE FEDERAL CONTROLLED SUBSTANCES ACT**

UNITED STATES OF AMERICA

* CRIMINAL NO.

*

v.

*

SECTION:

**22-00029
SECT. RMAG. 4**

JON VERDIN

*

VIOLATIONS:

*

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21 U.S.C. § 841(a)(1)
21 U.S.C. § 841(b)(1)(A)(vi)
18 U.S.C. § 924(c)(1)(A)(i)
18 U.S.C. § 922(g)(1)
18 U.S.C. § 924(e)(2)

* * *

The Grand Jury charges that:

COUNT 1

(Possession with the Intent to Distribute Fentanyl)

On or about February 2, 2022, in the Eastern District of Louisiana, the defendant, **JON VERDIN**, did knowingly and intentionally possess with the intent to distribute four hundred (400) grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] (fentanyl), a schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(vi).

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COUNT 2

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about February 2, 2022, in the Eastern District of Louisiana, the defendant, **JON VERDIN**, did knowingly possess firearms, to wit: an American Tactical, unknown model, .223 caliber rifle, bearing serial number MSA088955; a Glock, model 32, .357 caliber handgun, bearing serial number WUY298; a Smith and Wesson, model M&P shield, .9mm firearm, bearing serial number JMT2627; and a Stag Arms, model STAG-15, 5.56mm caliber rifle, bearing serial number 11310, in furtherance of a drug trafficking offense for which he may be prosecuted in a court of the United States, to wit: possession with the intent to distribute fentanyl, a violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(vi), as charged in Count 1 of this Indictment; all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 3

(Felon in Possession of a Firearm)

On or about February 2, 2022, in the Eastern District of Louisiana, defendant, **JON VERDIN**, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: a felony conviction on January 8, 2014, in Terrebonne Parish Judicial District Court, Docket No. 13-FELY-662878, for possession with the intent to distribute a schedule I controlled substance; a felony conviction on October 12, 2016, in Terrebonne Parish Judicial District Court, Docket No. 16-FELY-726187, for attempted felon in possession of a firearm and obstruction of justice; a felony conviction on October 12, 2016, in Terrebonne Parish Judicial District Court, Docket No. 16-FELY-726194, for attempted distribution of a schedule I controlled substance; a felony conviction on October 12, 2016, in Terrebonne Parish Judicial District Court, Docket No. 16-FELY-726191, for attempted distribution of a schedule I controlled substance; did knowingly possess firearms, to wit: an American Tactical, unknown model, .223

caliber rifle, bearing serial number MSA088955; a Glock, model 32, .357 caliber handgun, bearing serial number WUY298; a Smith and Wesson, model M&P shield, .9mm firearm, bearing serial number JMT2627; and a Stag Arms, model STAG-15, 5.56mm caliber rifle, bearing serial number 11310, said firearms having been in and affecting interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(e)(2).

NOTICE OF FORFEITURE

1. The allegations of Counts 1 through 3 of this Indictment are incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States.

2. As a result of the offense alleged in Count 1, the defendant, **JON VERDIN**, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any property constituting or derived from any proceeds obtained directly or indirectly as the result of said offense, and any property used or intended to be used in any manner or part to commit or to facilitate the commission of said offense, including but not limited to:

\$27,293.00 in U.S. currency;

\$21,780.00 in U.S. currency.

3. As a result of the offenses alleged in Counts 2 and 3, the defendant, **JON VERDIN**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any firearm or ammunition involved in or used in the commission of said offenses, including but not limited to any of the following:

American Tactical, unknown model, .223 caliber rifle, bearing serial number MSA088955;

Glock, model 32, .357 caliber handgun, bearing serial number WUY298;

Smith and Wesson, model M&P shield, .9mm firearm, bearing serial number JMT2627;

Stag Arms, model STAG-15, 5.56mm caliber rifle, bearing serial number 11310.

4. If any of the above-described property, 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 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;


the United States shall seek a money judgment and, pursuant to Title 21, United States Code, Section 853(p), forfeiture of any other property of the defendant up to the value of said property.

A TRUE BILL:



FOREPERSON

DUANE A. EVANS
UNITED STATES ATTORNEY



MELISSA E. BÜCHER
Assistant United States Attorney
Louisiana Bar Roll No. 36400

New Orleans, Louisiana
February 11, 2022