

Schedule II drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A); all in violation of Title 21, United States Code, Section 846.

COUNT 2

On or about September 22, 2014, in the Eastern District of Louisiana, the defendant, **GROSS WILLIAMS**, did knowingly and intentionally possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: conspiracy to possess with the intent to distribute and to distribute heroin and cocaine, as set forth in Count 1, which is incorporated herein; all in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 3

On or about September 22, 2014, in the Eastern District of Louisiana, the defendant, **GROSS WILLIAMS**, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: a conviction on December 20, 2012, in case number 672-11D in the 18th Judicial District Court for the Parish of Iberville, State of Louisiana, for Possession with Intent to Distribute a Schedule I Controlled Dangerous Substance, in violation of La. R.S. 40:966.A, did knowingly possess in and affecting interstate commerce a firearm, to wit: a Smith and Wesson, .40 caliber semi-automatic pistol, bearing serial number DSS6399, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 4

THE CONSPIRACY

Beginning at a time unknown, and continuing until on or about December 17, 2014, in the Eastern District of Louisiana, and elsewhere, the defendants, **GROSS WILLIAMS** and **KATHLEEN WILLIAMS**, did knowingly combine, conspire, and agree with each other, and

with other persons known and unknown to the Grand Jury, to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit:

(a) to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, narcotics distribution, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

MANNER AND MEANS

The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

GROSS WILLIAMS and **KATHLEEN WILLIAMS** would and did deposit proceeds from narcotics trafficking into the checking account of Boss Used Cars, LLC, a used car dealership owned by **GROSS WILLIAMS**.

GROSS WILLIAMS and **KATHLEEN WILLIAMS** would and did deposit proceeds from narcotics trafficking into a safety deposit box opened in the name of **KATHLEEN WILLIAMS** and J.G.W. at Regions Bank.

All in violation of Title 18, United States Code, Section 1956(h).

COUNT 5

On or about September 22, 2014, in the Eastern District of Louisiana, the defendant, **KATHLEEN WILLIAMS**, did knowingly alter, destroy, mutilate, and conceal tangible objects,

to wit: a cellular telephone and SIM card, with the intent to impede, obstruct, and influence the investigation of **GROSS WILLIAMS's** drug trafficking activities, a matter that the defendant knew and contemplated was within the jurisdiction of Drug Enforcement Administration, a department and agency of the United States, in violation of Title 18, United States Code, Section 1519.

NOTICE OF DRUG FORFEITURE

1. The allegations of Count 1 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 21, United States Code, Section 853.

2. As a result of the offenses alleged in Count 1, the defendant, **GROSS WILLIAMS**, 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 violations alleged in Count 1 of this Indictment, including but not limited to the following property:

\$425,905 U.S. Currency;

\$10,420.67 U.S. Currency;

\$240,820 U.S. Currency seized from Safety
Deposit Box No. 5060 located at Regions
Bank.

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 GUN FORFEITURE

1. The allegations of Counts 2 and 3 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 922(g), 924(c)(1)(A), and 924(d)(1), made applicable through Title 28, United States Code, Section 2461.

2. As a result of the offenses alleged in Counts 2 and 3, defendant, **GROSS WILLIAMS**, shall forfeit to the United States pursuant to Title 18, United States Code, Sections 922(g), 924(c)(1)(A), and 924(d)(1), made applicable through Title 28, United States Code, Section 2461, any firearm or ammunition, which was involved in or used in knowing violations of Title 18, United States Code, Sections 922(g)(1) and 924(c)(1)(A), as alleged in Counts 2 and 3 of the 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 18, United States Code, Sections 922(g), 924(c)(1)(A) and 924(d)(1), made applicable through Title 28, United States Code, Section 2461.

NOTICE OF MONEY LAUNDERING FORFEITURE

1. The allegations of Count 4 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, Section 982.

2. As a result of the offenses alleged in Count 4, defendants, **GROSS WILLIAMS and KATHLEEN WILLIAMS**, shall forfeit to the United States all property real or personal, involved in the aforesaid offenses and all property traceable to such property which was involved in the said violations of Title 18, United States Code, Sections 1956 and 982, including but not limited to the following property:

\$240,820 U.S. Currency seized from Safety
Deposit Box No. 5060 located at Regions
Bank.

3. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

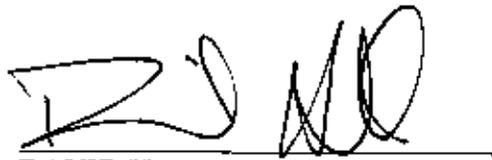
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;

- 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 18, United States Code, Section 982(b)(1) to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Section 982.

A TRUE BILL:



DAVID HALLER
Assistant United States Attorney

FOREPERSON'S SIGNATURE
HAS BEEN REDACTED

New Orleans, Louisiana
January 22, 2015

FORM OBD-34

No. _____

UNITED STATES DISTRICT COURT

_____ Eastern District of Louisiana
_____ Criminal Division

THE UNITED STATES OF AMERICA

vs.

**GROSS WILLIAMS
KATHLEEN WILLIAMS**

INDICTMENT

**INDICTMENT FOR VIOLATIONS OF THE FEDERAL
CONTROLLED SUBSTANCES ACT, THE FEDERAL GUN
CONTROL ACT, CONSPIRACY TO LAUNDER
MONEY, AND OBSTRUCTION**

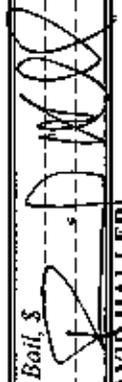
- VIOLATIONS:**
- 21 U.S.C. § 841(a)(1)
 - 21 U.S.C. § 841(b)(1)(A)
 - 21 U.S.C. § 846
 - 18 U.S.C. § 924(c)(1)(A)
 - 18 U.S.C. § 922(g)(1)
 - 18 U.S.C. § 1956(h)
 - 18 U.S.C. § 1519

**FOREPERSON'S SIGNATURE
HAS BEEN REDACTED**

Filed in open court this _____ day of _____ A.D. 2015.

Clerk

Bail, \$



DAVID HALLER

Assistant United States Attorney