

FILED
DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

2015 FEB 12 PM 1:29

WILLIAM H. FLETCHER
CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**INDICTMENT FOR VIOLATIONS OF
THE FEDERAL CONTROLLED SUBSTANCES ACT**

UNITED STATES OF AMERICA

* CRIMINAL NO.

15-30

v.

* SECTION:

SECT. K MAG. 3

NELSON ROUSSELL
ZACHARY DEMERS

* VIOLATIONS: 21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(C)

*

21 U.S.C. § 846

* * *

The Grand Jury charges that:

COUNT 1

Beginning on a date unknown and continuing until on or about February 4, 2015, in the Eastern District of Louisiana, the defendants, **NELSON ROUSSELL** and **ZACHARY DEMERS**, did knowingly and intentionally combine, conspire, confederate and agree with each other, and other persons known and unknown to the Grand Jury, to distribute and to possess with the intent to distribute a quantity of a mixture or substance containing a detectable amount of methamphetamine, 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.

Fee _____
Process _____
x Dktd _____
CtRmDep _____
Doc. No. _____

COUNT 2

On or about January 13, 2015, in the Eastern District of Louisiana, the defendant, **NELSON ROUSSELL**, did knowingly and intentionally distribute a quantity of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 3

On or about February 4, 2015, in the Eastern District of Louisiana, the defendant, **NELSON ROUSSELL**, did knowingly and intentionally possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 4

On or about February 4, 2015, in the Eastern District of Louisiana, the defendant, **ZACHARY DEMERS**, did knowingly and intentionally possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

NOTICE OF DRUG FORFEITURE

1. The allegations of Counts 1–4 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 25, United States Code, Section 853.

2. As a result of the offenses alleged in Counts 1–4 of this Indictment, the defendants, **NELSON ROUSSELL** and **ZACHARY DEMERS**, 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 1–4 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 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.



KENNETH ALLEN POLITE, JR
UNITED STATES ATTORNEY


BRANDON S. LONG
Assistant United States Attorney
D.C. Bar No. 500721

New Orleans, Louisiana
February 12, 2015

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Louisiana
Criminal Division

THE UNITED STATES OF AMERICA

vs.

**NELSON ROUSSELL
ZACHARY DEMERS**

INDICTMENT


**INDICTMENT FOR VIOLATIONS OF THE FEDERAL
CONTROLLED SUBSTANCES ACT**

**VIOLATIONS: 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C),
and 846**

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

Clerk

Bail, \$ _____


BRANDON S. LONG
Assistant United States Attorney

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ INFORMATION ☒ INDICTMENTMatter Sealed: ☐ Juvenile ☐ Other than Juvenile
☐ Pre-Indictment Plea ☐ Superseding ☐ Defendant Added
☐ Indictment ☐ Charges/Counts Added
☐ Information

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT EASTERN
DISTRICT OF LOUISIANA Divisional OfficeName and Office of Person
Furnishing Information on
THIS FORM Alana Lincoln
☒ U.S. Atty ☐ Other U.S. Agency
Phone No. (504) 680-3000Name of Asst.
U.S. Attorney Brandon S. Long
(if assigned)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)
DEA/William Ard☐ person is awaiting trial in another Federal or State Court
(give name of court)☐ this person/proceeding transferred from another district
per (circle one) FRCrP 20, 21 or 40. Show District☐ this is a reprosecution of charges
previously dismissed which were
dismissed on motion of:☐ U.S. Atty ☐ Defense☐ this prosecution relates to a
pending case involving this same
defendant. (Notice of Related
Case must still be filed with the
Clerk.)☒ prior proceedings or appearance(s)
before U.S. Magistrate Judge
regarding this defendant were
recorded underSHOW
DOCKET NO.MAG. JUDGE
CASE NO.
15-024 MAGPlace of
offense Orleans Parish County

CASE NO.

USA vs.

Defendant: ZACHARY DEMERS

Address:

☐ Interpreter Required Dialect: _____Birth Date 1993 ☒ Male ☐ Alien
☐ Female (if applicable)

Social Security Number xxx-xx-4042

DEFENDANT

Issue: ☐ Warrant ☒ Summons

Location Status:

Arrest Date 2/5/2015 or Date Transferred to Federal Custody

☒ Currently in Federal Custody☐ Currently in State Custody☐ Writ Required☐ Currently on bond☐ Fugitive

Defense Counsel (if any): Valerie W. Jusselin

☒ FPD ☐ CJA ☐ RET'D☐ Appointed on Target Letter☐ This report amends AO 257 previously submitted

OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 2 (for this defendant only)

Offense Level (1, 3, 4)	Title & Section/ (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Count(s)
4	Title 21, U.S.C., § 846	Conspiracy to dist. a quantity of a mixture or substance of methamphetamine	1
4	Title 21, U.S.C., § § 841(a)(1) and (b)(1)(C)	PWIT of a quantity of mixture/substance cont. methamphetamine	4

PER 18 U.S.C. 3170

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ INFORMATION ☒ INDICTMENTMatter Sealed: ☐ Juvenile ☐ Other than Juvenile
☐ Pre-Indictment Plea ☐ Superseding ☐ Defendant Added
☐ Indictment ☐ Charges/Counts Added
☐ Information

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT EASTERN
DISTRICT OF LOUISIANA Divisional OfficeName and Office of Person
Furnishing Information on
THIS FORM

Alana Lincoln

☒ U.S. Atty ☐ Other U.S. Agency
Phone No. (504) 680-3000Name of Asst.
U.S. Attorney
(if assigned)

Brandon S. Long

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)
DEA/William Ard☐ person is awaiting trial in another Federal or State Court
(give name of court)☐ this person/proceeding transferred from another district
per (circle one) FRCrP 20, 21 or 40. Show District☐ this is a reprosecution of charges
previously dismissed which were
dismissed on motion of:☐ U.S. Atty ☐ Defense☐ this prosecution relates to a
pending case involving this same
defendant. (Notice of Related
Case must still be filed with the
Clerk.)SHOW
DOCKET NO.☒ prior proceedings or appearance(s)
before U.S. Magistrate Judge
regarding this defendant were
recorded underMAG. JUDGE
CASE NO.

15-024 MAG

Place of
offense

Orleans Parish

County

CASE NO.

USA vs.

Defendant: NELSON ROUSSELL

Address:

☐ Interpreter Required Dialect: _____Birth
Date 1984☒ Male ☐ Alien
☐ Female (if applicable)

Social Security Number xxx-xx-7612

DEFENDANT

Issue: ☐ Warrant ☒ Summons

Location Status:

Arrest Date 2/5/2015 or Date Transferred to Federal Custody

☒ Currently in Federal Custody☐ Currently in State Custody☐ Writ Required☐ Currently on bond☐ Fugitive

Defense Counsel (if any): Claude Kelly

☒ FPD ☐ CJA ☐ RET'D☐ Appointed on Target Letter☐ This report amends AO 257 previously submitted

OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 3 (for this defendant only)

Offense Level (1, 3, 4)	Title & Section/ (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Count(s)
4	Title 21, U.S.C., § 846	Conspiracy to dist. a quantity of a mixture or substance of methamphetamine	1
4	Title 21, U.S.C., §§ 841(a)(1) and (b)(1)(C)	Distribution of a quantity of mixture/substance cont. methamphetamine	2
4	Title 21, U.S.C., §§ 841(a)(1) and (b)(1)(C)	Distribution of a quantity of mixture/substance cont. methamphetamine	3

TO: DOCKET CLERK

**15 - 30
SECT. K MAG. 3**

X MAGISTRATE CASE NUMBER 15-24

OR

NO MAGISTRATE PAPERS WERE FOUND

for

NAME: NELSON ROUSSELL; ZACHARY

DEMERS

Initials: TBL

If you receive this note without any initials,
please return the entire packet to criminal desk .

Thank you