

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

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

UNITED STATES OF AMERICA	*	CRIMINAL NO.
v.	*	SECTION:
JONATHAN LAWRENCE	*	VIOLATIONS: 21 U.S.C. § 841(a)(1)
a/k/a "Chop"		21 U.S.C. § 841(b)(1)(C)
a/k/a "Meego"	*	21 U.S.C. § 846
DONALD MARCELIN		18 U.S.C. § 924(o)
a/k/a "Snook"	*	
a/k/a "Black"		
a/k/a "Golfer"	*	
BRANDON HALL		
a/k/a "B-Hilly"	*	
BRIAN MAXSON		
a/k/a "Chin"	*	

* * *

The Grand Jury charges that:

COUNT 1

Beginning at a time unknown but not later than December 2015, and continuing through the present, in the Eastern District of Louisiana and elsewhere, the defendants, **JONATHAN LAWRENCE**, a/k/a "Chop," a/k/a "Meego," **DONALD MARCELIN**, a/k/a "Snook," a/k/a "Black," a/k/a "Golfer," **BRANDON HALL**, a/k/a "B-Hilly," and **BRIAN MAXSON**, a/k/a

“**Chin**,” did knowingly and intentionally combine, conspire, confederate and agree with each other and with 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 heroin, a Schedule I 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.

COUNT 2

Beginning at a time unknown but not later than December 2015, and continuing through the present, in the Eastern District of Louisiana and elsewhere, the defendants, **JONATHAN LAWRENCE, a/k/a “Chop,” a/k/a “Meego,” BRANDON HALL, a/k/a “B-Hilly,” and BRIAN MAXSON, a/k/a “Chin,”** did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons known and unknown to the Grand Jury, to possess firearms in furtherance of a drug trafficking crime as alleged in Count 1, to wit: conspiracy to distribute controlled substances; all in violation of Title 18, United States Code, Section 924(o).

NOTICE OF DRUG FORFEITURE

1. The allegation of Count 1 of this Indictment is 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 offense alleged in Count 1 of this Indictment, the defendants, **JONATHAN LAWRENCE, a/k/a “Chop,” a/k/a “Meego,” DONALD MARCELIN, a/k/a “Snook,” a/k/a “Black,” a/k/a “Golfer,” BRANDON HALL, a/k/a “B-Hilly,” and BRIAN MAXSON, a/k/a “Chin,”** 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 violation alleged in Count 1 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.

NOTICE OF GUN FORFEITURE

1. The allegation in Count 2 of this Indictment is 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 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. As a result of the offense alleged in Count 2, the defendants, **JONATHAN LAWRENCE, a/k/a "Chop," a/k/a "Meego," BRANDON HALL, a/k/a "B-Hilly,"** and

BRIAN MAXSON, a/k/a “Chin,” shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1), made applicable through Title 28, United States Code, Section 2461(c), any firearm or ammunition, which was involved in or used in a knowing violation of Title 18, United States Code, Sections 924(c)(1)(A) and 924(o), as alleged in Count 2 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 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 18, United States Code, Section 924(d)(1), made applicable through Title 28, United States Code, Section 2461(c).

A TRUE BILL:

F O R E P E R S O N

KENNETH ALLEN POLITE, JR
UNITED STATES ATTORNEY

A handwritten signature in cursive script, appearing to read "Brandon S. Long", written over a horizontal line.

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

New Orleans, Louisiana
April 21, 2016