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U.S. DISTRICT COURT
EASTERN DISTRICT OF LA.
2018 JUL 12 P 1:54
WILLIAM W. BLEVINS
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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. 18-150
v.	*	SECTION: SECT. 1 MAG. 3
JERRY PEA	*	VIOLATION: 21 U.S.C. § 841(a)(1)
JAMES JACKSON	*	21 U.S.C. § 841(b)(1)(B)
	*	21 U.S.C. § 841(b)(1)(C)
	*	21 U.S.C. § 846
	*	18 U.S.C. § 924(c)(1)(A)
	*	18 U.S.C. § 2

* * *

The Grand Jury charges that:

COUNT 1

(Conspiracy to Distribute and Possess With Intent to Distribute Cocaine Base and Heroin)

Beginning on a date unknown, but no later than March 9, 2018, and continuing to on or about May 16, 2018, in the Eastern District of Louisiana, the defendants, **JERRY PEA** and **JAMES JACKSON**, 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 possess with the intent to distribute twenty-eight (28) grams or more of a mixture or substance containing

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cocaine base, a Schedule II drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and a quantity of a mixture or substance containing 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

(Distribution of Cocaine Base and Heroin)

On or about March 9, 2018, in the Eastern District of Louisiana, the defendants, **JERRY PEA** and **JAMES JACKSON**, aiding and abetting each other, did knowingly and intentionally distribute a quantity of a mixture or substance containing a detectable amount of cocaine base, a Schedule II drug controlled substance, and 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), and Title 18, United States Code, Section 2.

COUNT 3

(Distribution of Heroin)

On or about March 15, 2018, in the Eastern District of Louisiana, the defendants, **JERRY PEA** and **JAMES JACKSON**, aiding and abetting each other, did knowingly and intentionally 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), and Title 18, United States Code, Section 2.

COUNT 4

(Distribution of Cocaine Base and Heroin)

On or about March 26, 2018, in the Eastern District of Louisiana, the defendants, **JERRY PEA** and **JAMES JACKSON**, aiding and abetting each other, did knowingly and intentionally

distribute a quantity of a mixture or substance containing a detectable amount of cocaine base, a Schedule II drug controlled substance, and 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), and Title 18, United States Code, Section 2.

COUNT 5

(Distribution of Cocaine Base)

On or about April 12, 2018, in the Eastern District of Louisiana, the defendants, **JERRY PEA** and **JAMES JACKSON**, aiding and abetting each other, did knowingly and intentionally distribute twenty-eight grams or more of a mixture or substance containing a detectable amount of cocaine base, a Schedule II drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT 6

(Distribution of Cocaine Base and Heroin)

On or about May 4, 2018, in the Eastern District of Louisiana, the defendants, **JERRY PEA** and **JAMES JACKSON**, aiding and abetting each other, did knowingly and intentionally distribute a quantity of a mixture or substance containing a detectable amount of cocaine base, a Schedule II drug controlled substance, and 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), and Title 18, United States Code, Section 2.

COUNT 7

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

On or about March 26, 2018, in the Eastern District of Louisiana, the defendant, **JERRY PEA**, did knowingly possess a firearm in furtherance of a drug trafficking crime for which the

defendant may be prosecuted in a court of the United States, that is, conspiracy to distribute and possess with the intent to distribute cocaine base and heroin, as alleged in Count 1 of the Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT 8

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

On or about April 12, 2018, in the Eastern District of Louisiana, the defendant, **JAMES JACKSON**, did knowingly possess a firearm in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, that is, conspiracy to distribute and possess with the intent to distribute cocaine base and heroin, as alleged in Count 1 of the Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

NOTICE OF DRUG FORFEITURE

1. The allegations of Counts One through Six 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 offense charged in Counts One through Six, the defendants, **JERRY PEA** and **JAMES JACKSON**, 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 said violation 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 Counts One through Six 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, Sections 853, 841(a)(1), and 841(b)(1).

NOTICE OF GUN FORFEITURE

1. The allegations of Counts Seven and Eight 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 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. As a result of the offenses alleged in Counts Seven and Eight, the defendants, **JERRY PEA** and **JAMES JACKSON**, 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, any firearm or ammunition, which was involved in or used in knowing violations of Title 18, United States Code, Section 924(c)(1)(A), as alleged in Counts Seven and Eight 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 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 18, United States Code, Sections 924(c)(1)(A) and 924(d)(1).

A TRUE BILL:



DUANE A. EVANS
UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read "Jeffrey Sandman", written over a horizontal line.

JEFFREY SANDMAN
Assistant United States Attorney

New Orleans, Louisiana
July 12, 2018

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Louisiana
Criminal Division

THE UNITED STATES OF AMERICA

vs.
**JERRY PEA
JAMES JACKSON**

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

**VIOLATIONS: 21 U.S.C. § 841(a)(1)
21 U.S.C. § 841(b)(1)(B)
21 U.S.C. § 841(b)(1)(C)
21 U.S.C. § 846
18 U.S.C. § 924(c)(1)(A)
18 U.S.C. § 2**



Filed in open court this _____ day of _____ A.D. 2018.

Clerk

Bail, \$ _____


JEFFREY SANDMAN
Assistant United States Attorney