U.S. DISTRICT COURT EASTERN DISTRICT OF LA. 2018 SEP 21 P 3: 10 WILLIAM W. BLEVINS CLERK

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

INDICTMENT FOR VIOLATIONS OF THE FEDERAL CONTROLLED SUBSTANCES ACT

v.

CRIMINAL NO.: 18 - 202

SECTION:

SECT. I MAG. 1

SHALLON DAVIS DUNMILES

LASHONDA MELANCON

WILFRED PERRILLOUX

ANDREA STALKS

EBONY STEWART

DANYELLE TUCO

CORTAZ WILLIAMS

DANIELLE ANDERSON

VIOLATION: 21 U.S.C. § 846

21 U.S.C. § 841(a)(1)

21 U.S.C. § 843(a)(3)

21 U.S.C. § 841(b)(1)(C)

21 U.S.C. § 841(b)(3)

21 U.S.C. § 853

The Grand Jury charges that:

COUNT 1

Beginning in or about April 2017, and continuing through February 2018, in the Eastern District of Louisiana and elsewhere, the defendants, SHALLON DAVIS DUNMILES and LASHONDA MELANCON did knowingly and intentionally combine, conspire, confederate, and agree with other persons known and unknown to the Grand Jury to possess with the intent to

Process_ ___ C!RmDsp_ L. Coc. No. distribute quantities of a mixture and substance containing a detectable amount of dextroamphetamine and adderall, Schedule II drug controlled substances, and promethazine with codeine, a Schedule V drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and 841(b)(3); all in violation of Title 21, United States Code, Section 846.

COUNT 2

Beginning in or about April 2017, and continuing through February 2018, in the Eastern District of Louisiana and elsewhere, the defendants, SHALLON DAVIS DUNMILES, LASHONDA MELANCON, WILFRED PERRILLOUX, ANDREA STALKS, EBONY STEWART, DANYELLE TUCO, CORTAZ WILLIAMS, and DANIELLE ANDERSON did knowingly and intentionally combine, conspire, confederate, and agree with each other and other persons known and unknown to the Grand Jury to acquire and obtain possession of a mixture and substance containing a detectable amount of dextroamphetamine and adderall, Schedule II drug controlled substances, and promethazine with codeine, a Schedule V drug controlled substance, by misrepresentation, fraud, forgery, deception, and subterfuge, in violation of Title 21, United States Code, Section 843(a)(3); all in violation of Title 21, United States Code, Section 846.

NOTICE OF DRUG FORFEITURE

- 1. The allegations contained in Counts 1 and 2 of this Indictment are hereby 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 Counts 1 and 2, the defendants, SHALLON DAVIS DUNMILES, LASHONDA MELANCON, WILFRED PERRILLOUX, ANDREA

STALKS, EBONY STEWART, DANYELLE TUCO, CORTAZ WILLIAMS, and DANIELLE ANDERSON, 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 and 2 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 any 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.

A TRUE BILL:

PETER G. STRASSER

UNITED STATES ATTORNEY

SHIRIN HAKIMZADEH

Assistant United States Attorney

New Orleans, Louisiana September 21, 2018