

FILED  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF LA.

2019 MAY 31 A 11:5

WILLIAM W. BLEVINS  
CLERK

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

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

UNITED STATES OF AMERICA

v.

ANDREW ANDERSON  
a/k/a "Dookie"

CRIMINAL NO.:

**19-00111**

SECTION:

**SECT. 1 MAG. 3**

VIOLATIONS:

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(C)

18 U.S.C. § 922(g)(1)

18 U.S.C. § 924(a)(2)

18 U.S.C. § 924(c)(1)(A)

18 U.S.C. § 924(c)(1)(A)(i)

\* \* \*

The Grand Jury charges that:

**COUNT 1**

**(Possession with the Intent to Distribute Controlled Dangerous Substances)**

On or about May 22, 2019, in the Eastern District of Louisiana, the defendant, **ANDREW ANDERSON**, a/k/a "Dookie," did knowingly 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, a quantity of a mixture or substance containing a detectable amount of cocaine base ("crack"), and a quantity of a mixture or substance containing a detectable amount of **Fee**

☒ Process  
☒ Dkt'd  
\_\_\_\_ CtRmDep  
\_\_\_\_ Doc. No. \_\_\_\_\_

cocaine hydrochloride, both of which are Schedule II drug controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT 2**  
**(Possession of Firearms in Furtherance of a Drug Trafficking Crime)**

On or about May 22, 2019, in the Eastern District of Louisiana, the defendant, **ANDREW ANDERSON**, a/k/a "Dookie," did knowingly possess several firearms, to wit: a Glock, Model 42, .380 caliber, semi-automatic pistol, bearing serial number ABSL406; an FNH, Model FNX-40, 40 Smith and Wesson caliber, semi-automatic pistol, bearing serial number FX2U002925; a Zastava, CAI, Model PAP M92 PV, 7.62x39 millimeter, caliber, semi-automatic pistol, bearing serial number M92PV008702; a Ruger P97DC .45 Caliber semiautomatic handgun, with an obliterated serial number; in furtherance of a drug trafficking offense for which he may be prosecuted in a court of the United States, to wit: possession with the intent to distribute heroin, cocaine base ("crack"), and cocaine hydrochloride, as charged in Count 1 of this Indictment; in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 924(c)(1)(A)(i).

**COUNT 3**  
**(Possession of Firearms and Ammunition by a Convicted Felon)**

On or about May 22, 2019, in the Eastern District of Louisiana, the defendant, **ANDREW ANDERSON**, a/k/a "Dookie," possessed in and affecting interstate commerce, firearms and ammunition, to wit: a Glock, Model 42, .380 caliber, semi-automatic pistol, bearing serial number ABSL406; an FNH, Model FNX-40, 40 Smith and Wesson caliber, semi-automatic pistol, bearing serial number FX2U002925; a Zastava, CAI, Model PAP M92 PV, 7.62x39 millimeter, caliber, semi-automatic pistol, bearing serial number M92PV008702; a Ruger P97DC .45 Caliber semiautomatic handgun, with an obliterated serial number; ten (10) rounds of .380 automatic caliber ammunition; nine (9) rounds of 40 Smith and Wesson caliber ammunition; seven (7) rounds of .45

ACP caliber ammunition; eighteen (18) rounds of 7.62x39 millimeter caliber ammunition; and thirty-nine (39) rounds of Remington, .380 automatic caliber ammunition, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: a conviction on or about January 31, 2012, in the 40<sup>th</sup> Judicial District Court, Parish of St. John the Baptist, State of Louisiana, for Possession with the Intent to Distribute Cocaine, in violation of La. R.S. 40:967(C), in Case Number 2008-CR-59, Section "C," and did so knowingly, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

#### **NOTICE OF FORFEITURE**

1. The allegations of Counts 1 through 3 are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States.

2. As a result of the offense alleged in Count 1, the defendant, **ANDREW ANDERSON**, a/k/a "Dookie," shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any property constituting or derived from any proceeds the defendant obtained directly or indirectly as the result of said offense, and any property used or intended to be used in any manner or part to commit or to facilitate the commission of said offense, including but not limited to the following: \$33,176.10 U.S. Currency.

3. As a result of the offenses alleged in Counts 2 and 3, the defendant, **ANDREW ANDERSON**, a/k/a "Dookie," 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(c), any firearm or ammunition involved in or used in the commission of said offenses, including but not limited to any firearm or ammunition identified in the foregoing allegations.


4. If any of the above-described property, 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 jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

the United States shall, pursuant to Title 21, United States Code, Section 853(p), seek forfeiture of any other property of the defendant up to the value of the above-described property.



PETER G. STRASSER  
UNITED STATES ATTORNEY

  
BRITTANY L. REED  
Assistant United States Attorney  
LA Bar Roll No. 31299

New Orleans, Louisiana  
May 31, 2019