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U.S. DISTRICT COURT
EASTERN DISTRICT OF LA.

2019 JUL 25 P 12:40

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**INDICTMENT FOR CONSPIRACY TO COMMIT ROBBERY
INVOLVING A CONTROLLED SUBSTANCE, ROBBERY
INVOLVING A CONTROLLED SUBSTANCE, AND DISCHARGE
OF A FIREARM IN FURTHERANCE OF A CRIME OF VIOLENCE**

UNITED STATES OF AMERICA

*

CRIMINAL NO.:

19-145

v.

*

SECTION:

SECT. T MAG 4

RICHARD SANSBURY
ALAN PARSON

*

VIOLATIONS:

18 U.S.C. § 2118
18 U.S.C. § 924(c)(1)(A)(iii)
18 U.S.C. § 2118(a)
18 U.S.C. § 2118(c)(1)
18 U.S.C. § 2118(d)
18 U.S.C. § 2

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The Grand Jury charges that:

COUNT 1

A. AT ALL TIMES MATERIAL HEREIN:

1. CVS Pharmacy Inc. operated a pharmacy at 4901 Prytania Street, New Orleans, Louisiana that sold, among other things, materials and compounds containing quantities of "controlled substances" as that term is defined in section 102 of the Controlled Substances Act.

2. The controlled substances being sold at the CVS pharmacy belonged to and were in the care, custody, control, and possession of a person registered with the Drug Enforcement Administration under section 302 of the Controlled Substances Act.

B. THE CONSPIRACY:

Beginning at a time unknown, but not later than early June 2019, and continuing until at least June 17, 2019, in the Eastern District of Louisiana and elsewhere, the defendants, **RICHARD SANSBURY** and **ALAN PARSON**, did knowingly combine, conspire, confederate and agree with each other and with other persons known and unknown to the Grand Jury, to take and attempt to take from the person and presence of another by force and violence and by intimidation any material or compound containing any quantity of a controlled substance belonging to and in the care, custody, control, and possession of a person registered with the Drug Enforcement Administration under section 302 of the Controlled Substances Act, in violation of Title 18, United States Code, Section 2118(a).

C. OVERT ACTS:

In furtherance of the conspiracy and to accomplish the unlawful objects thereof, the defendants, **RICHARD SANSBURY** and **ALAN PARSON**, committed the following overt acts, among others, in the Eastern District of Louisiana:

1. On or about June 17, 2019, **RICHARD SANSBURY** and **ALAN PARSON** entered the CVS pharmacy at 4901 Prytania Street, New Orleans, Louisiana while armed with handguns.
2. On or about June 17, 2019, **RICHARD SANSBURY** and **ALAN PARSON** forced the CVS cashier into a restroom in the store and zip tied his hands together.
3. On or about June 17, 2019, **RICHARD SANSBURY** and **ALAN PARSON** proceed to the pharmacy section of the CVS, placed the pharmacist on the ground at gunpoint, and zip tied his feet together.

4. On or about June 17, 2019, **RICHARD SANSBURY** and **ALAN PARSON** removed numerous pill bottles containing narcotics and other controlled substances from behind the pharmacy counter, placing them into a black bag.
5. On or about June 17, 2019, **RICHARD SANSBURY** and **ALAN PARSON** attempted to leave the CVS store via the front door with the stolen narcotics, but observed New Orleans Police Department Officers and retreated into the store, dropping the bag of pills near the front door.
6. On or about June 17, 2019, **RICHARD SANSBURY** and **ALAN PARSON** again attempted to leave the CVS store and fired their weapons at the responding police officers, who were seeking cover in the parking lot of the shopping center, striking one of the officers in the shoulder area.

All in violation of Title 18, United States Code, Section 2118(d).

COUNT 2

On or about June 17, 2019, in the Eastern District of Louisiana, **RICHARD SANSBURY** and **ALAN PARSON**, defendants herein, did take and attempt to take from the person and presence of another by force and violence and by intimidation any material or compound containing any quantity of a controlled substance belonging to and in the care, custody, control, and possession of a person registered with the Drug Enforcement Administration under section 302 of the Controlled Substances Act, and in the course of committing such offense assaulted any person and put in jeopardy the life of any person, by the use of a dangerous weapon or device, in violation of Title 18, United States Code, Sections 2118(a), 2118(c)(1), and 2.

COUNT 3

On or about June 17, 2019, in the Eastern District of Louisiana, **RICHARD SANSBURY** and **ALAN PARSON**, defendants herein, did knowingly use, carry, brandish, and discharge firearms during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, armed robbery involving controlled substances, in violation of Title

18, United States Code, Sections 2118 and 2, as set forth in Count 2 of this Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(iii) and 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 offenses alleged in Counts 1 through 3, the defendants, **RICHARD SANSBURY** and **ALAN PARSON**, 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 described in the foregoing allegations.

3. 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.

A TRUE BILL:



FOREPERSON

PETER G. STRASSER
UNITED STATES ATTORNEY


BRITTANY REED
DAVID E. HALLER
Assistant United States Attorneys

New Orleans, Louisiana
July 25, 2019