

substance; all in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and 841(b)(1)(C).

COUNT 2

(Felon in Possession of a Firearm)

On or about July 22, 2020, in the Eastern District of Louisiana, the defendant, **CHARLES ROY**, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: a conviction on December 18, 2017, in Jefferson Parish Criminal District Court, under case number 17-6174, Division "G," for Possession of Cocaine, in violation of LA. R.S.40:967.C. and Possession of with Intent to Distribute Methamphetamine, in violation of LA. R.S. 40:967.A., did knowingly possess a firearm, to wit: a FN Five-seven, 5.7x28mm caliber semi-automatic handgun, bearing serial number 386359590, said possessed firearm having traveled in and affecting interstate commerce; all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 3

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

On or about July 22, 2020, in the Eastern District of Louisiana, the defendant, **CHARLES ROY**, did knowingly carry a firearm, to wit: a FN Five-seven, 5.7x28mm caliber semi-automatic handgun, bearing serial number 386359590, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: did knowingly and intentionally possess with intent to distribute forty (40) grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), a Schedule II drug controlled substance and a quantity of a mixture and 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) , 841(b)(1)(B), and 841(b)(1)(C), as charged in Count 1 of

this Indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and (2).

NOTICE OF FORFEITURE

1. The allegations of Counts 1 through 3 of this Indictment are 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, **CHARLES ROY** shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any property constituting or derived from any proceeds 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.

3. As a result of the offenses alleged in Counts 1 through 3, the defendant, **CHARLES ROY**, 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:

FN Five-seven, 5.7x28mm caliber semi-automatic handgun, bearing serial number 386359590.

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 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;

the United States shall seek a money judgment and, pursuant to Title 21, United States Code, Section 853(p), forfeiture of any other property of the defendant up to the value of said property.

A TRUE BILL:



DUANE A. EVANS
UNITED STATES ATTORNEY

A handwritten signature in ink, appearing to read "C. Usher II", written over a horizontal line.

CHRISTOPHER D. USHER II
Assistant United States Attorney
SC Bar No. 101885

New Orleans, Louisiana
July 1, 2021