

U.S. DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

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CAROL L. HICKS
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

* CRIMINAL NO.

**22-00034
SECT. JMAG.1**

v.

* SECTION:

TONI JONES
TIMREK ANDREWS

* VIOLATIONS: 18 U.S.C. § 922(g)(1)
18 U.S.C. § 924(a)(2)
* 18 U.S.C. § 924(c)(1)(A)(i)
18 U.S.C. § 2
* 21 U.S.C. § 841(a)(1)
21 U.S.C. § 841(b)(1)(C)

* * *

The Grand Jury charges that:

COUNT 1

(Possession with Intent to Distribute Controlled Substances)

On or about February 10, 2022, in the Eastern District of Louisiana, the defendant, **TONI JONES**, knowingly and intentionally possessed with the intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine base (“crack”), a quantity of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, that is fentanyl, and a quantity of a mixture and substance containing a detectable amount of methamphetamine, all Schedule II controlled substances; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

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CtRmDep _____
Doc.No. _____

COUNT 2

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

On or about February 10, 2022, in the Eastern District of Louisiana, the defendant, **TONI JONES**, did knowingly possess a firearm in furtherance of a drug trafficking crime for which she may be prosecuted in a court of the United States, that is, possession with intent to distribute controlled substances, as charged in Count 1, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 3

(Possession of a Firearm by a Convicted Felon)

On or about February 10, 2022, in the Eastern District of Louisiana, the defendant, **TONI JONES**, knowing that she had been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: a conviction on July 13, 2021, in the 34th Judicial District Court, State of Louisiana, case number 20-01663 “E,” for possession of fentanyl, a violation of LA R.S. 20:967 and possession of heroin, a violation of LA R.S. 40:966, did knowingly possess a firearm, that is a Glock 43, 9mm handgun, bearing serial number AEXX519, said firearm being in and affecting interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 2.

COUNT 4

(Possession of a Firearm by a Convicted Felon)

On or about February 10, 2022, in the Eastern District of Louisiana, the defendant, **TIMREK ANDREWS**, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: a conviction on December 5, 2007, in the United States District Court for the Eastern District of Louisiana, Case Number 07-79 “L,” for possession of a firearm by a convicted felon in violation of Title 18, United States Code, Section 922(g)(1), did knowingly possess a firearm, that is a Glock 43, 9mm handgun, bearing serial

number AEXX519, said firearm being in and affecting interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 2.

NOTICE OF FORFEITURE

1. The allegations of Counts 1 through 4 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, **TONI JONES**, 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 2, 3, and 4, the defendants, **TONI JONES** and **TIMREK ANDREWS**, 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 of the following:

Glock 43, 9mm handgun, bearing serial number AEXX519.

4. If any of the above-described property, 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;

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 defendants up to the value of said property.

A TRUE BILL:



FOREPERSON

DUANE A. EVANS
UNITED STATES ATTORNEY



CHARLES D. STRAUSS
Assistant United States Attorney
Louisiana Bar Roll No. 36039

New Orleans, Louisiana
February 25, 2022