

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

FILED IN OPEN COURT

6.13.18

CLERK, U.S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE, FLORIDA

UNITED STATES OF AMERICA

v.

ROBERT RICHARD JODOIN

CASE NO. 3:18-cr-99-J-34 JRK
21 U.S.C. § 841(a)(1)
21 U.S.C. § 952
21 U.S.C. § 856
18 U.S.C. § 924(c)

INDICTMENT

The Grand Jury charges:

COUNT ONE

On or about April 16, 2018, in the Middle District of Florida, and
elsewhere, the defendant,

ROBERT RICHARD JODOIN,
did knowingly and intentionally import, and attempt to import, into the
United States from any place outside the United States a mixture and
substance containing a detectable amount of gamma-Hydroxybutyric Acid,
also referred to as "GHB," a Schedule I controlled substance.

In violation of 21 U.S.C. §§ 952(a), 960(a)(1), 960(b)(3) and 963.

COUNT TWO

On or about April 26, 2018, in the Middle District of Florida, and
elsewhere, the defendant,

ROBERT RICHARD JODOIN,

did knowingly and intentionally distribute a controlled substance, which violation involved a mixture and substance containing a detectable amount of methoxyacetylfentanyl, a Schedule I controlled substance, and is therefore punished under 21 U.S.C. § 841(b)(1)(C).

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C).

COUNT THREE

On or about June 6, 2018, in the Middle District of Florida, and elsewhere, the defendant,

ROBERT RICHARD JODOIN,

did knowingly and intentionally possess with intent to distribute a controlled substance, which violation involved a mixture and substance containing a detectable amount of cathinone, a Schedule I controlled substance, and is therefore punished under 21 U.S.C. § 841(b)(1)(C).

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C).

COUNT FOUR

From at least on or about May 11, 2018, through on or about June 6, 2018, in the Middle District of Florida, and elsewhere, the defendant,

ROBERT RICHARD JODOIN,

did knowingly use and maintain, and cause the use and maintaining, of a place, that is, a residence located at 5906 John Anderson Highway, Flagler

Beach, Florida, whether permanently or temporarily, for the purpose of distributing any controlled substance.

In violation of 21 U.S.C. § 856.

COUNT FIVE

On or about June 6, 2018, in the Middle District of Florida, the defendant,

ROBERT RICHARD JODOIN,

did knowingly possess a firearm in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a Court of the United States, specifically, using and maintaining a place for the purpose of distributing any controlled substance, as alleged in Count Four above; Count Four being incorporated by reference.

In violation of 18 U.S.C. § 924(c)(1)(A)(i).

FORFEITURE

1. The allegations contained in Counts One through Five are incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of 21 U.S.C. § 853 and 18 U.S.C. § 981(a)(1)(C), and 28 U.S.C. § 2461(c).

2. Upon conviction of a violation of 21 U.S.C. §§ 841(a)(1), 952 and/or 856, the defendant, ROBERT RICHARD JODOIN, shall forfeit to the

United States, pursuant to 21 U.S.C. § 853(a)(1) and (2), any property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as a result of such violation, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

3. Upon conviction of a violation of 18 U.S.C. § 924(c), the defendant, ROBERT RICHARD JODOIN, shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), all firearms and ammunition involved in or used in the violation.

4. The property to be forfeited includes, but is not limited to, the following:

- a. the domain name PRIMALVISIONS.NET, registered with Web.com, which has its headquarters at 12808 Gran Bay Parkway West, Jacksonville, Florida 32258;
- b. Cobra Enterprises of Utah, Model CA-380 pistol, serial number CP125046.


5. If any of the property described above, as a result of any acts or omissions 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 party;
- 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 divided without difficulty,

the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), and pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).


A TRUE BILL,



Foreperson

MARIA CHAPA LOPEZ
United States Attorney

By: 
LAURA COFER TAYLOR
Assistant United States Attorney

By: 
Frank M. Talbot
Assistant United States Attorney
Chief, Jacksonville Division

UNITED STATES DISTRICT COURT

Middle District of Florida
Jacksonville Division

THE UNITED STATES OF AMERICA

vs.

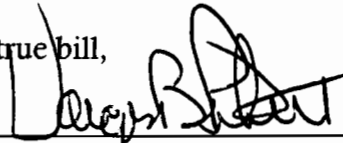
ROBERT RICHARD JODOIN

INDICTMENT

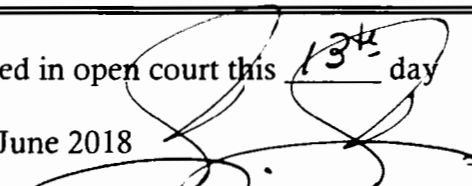
Violations:

Count 1: 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)
Count 2: 21 U.S.C. §§ 952(a), 960(a)(1), 960(b)(3) and 963
Count 3: 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)
Count 4: 21 U.S.C. § 856
Count 5: 18 U.S.C. § 924(c)(1)(A)(i)

A true bill,


Foreperson

Filed in open court this 13th day
of June 2018


Clerk

Bail \$ _____