

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

INDICTMENT FOR VIOLATIONS OF THE  
FEDERAL CONTROLLED SUBSTANCES ACT

**FELONY**

UNITED STATES OF AMERICA

\*

CRIMINAL DOCKET NO:

v.

\*

SECTION:

DONALD RICHARDSON

\*

VIOLATIONS: 21 U.S.C. 841(a)(1)  
21 U.S.C. 841(b)(1)(C)

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The Grand Jury charges that:

**COUNT 1**

On or about March 17, 2011, in the Eastern District of Louisiana, the defendant, **DONALD RICHARDSON**, did knowingly and intentionally distribute a quantity of cocaine base ("crack"), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT 2**

On or about March 23, 2011, in the Eastern District of Louisiana, the defendant, **DONALD RICHARDSON**, did knowingly and intentionally distribute a quantity of cocaine

base ("crack"), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

### **NOTICE OF FORFEITURE**

1. The allegations of Counts 1 and 2 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 21, United States Code, Section 853.

2. As a result of the offenses alleged in Counts 1 and 2, the defendant, **DONALD RICHARDSON**, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit or to facilitate the commission of the violations alleged in Counts 1 and 2 of this Indictment.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, as a result of any acts or omissions of the defendant, **DONALD RICHARDSON**:

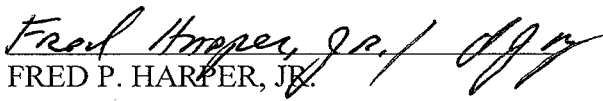
- a.) cannot be located upon the exercise of due diligence;
- b.) has been transferred or sold to, or deposited with, a third person;
- c.) has been placed beyond the jurisdiction of the Court;
- d.) has been substantially diminished in value; or
- e.) has been commingled with other property which cannot be subdivided without difficulty;

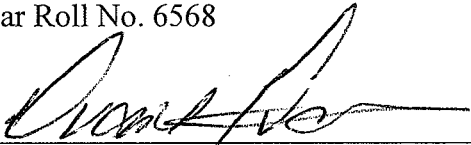
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant. up to the value of the above forfeitable property; all in violation of Title 21, United States Code, Section 853.

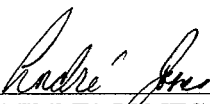
**A TRUE BILL:**

**FOREPERSON**

  
DANA J. BOENTE  
UNITED STATES ATTORNEY

  
FRED P. HARPER, JR.  
First Assistant United States Attorney  
Bar Roll No. 6568

  
DUANE A. EVANS  
Chief, Criminal Division  
Assistant United States Attorney  
Bar Roll No. 24086

  
ANDRE' JONES  
Assistant United States Attorney  
Bar Roll No. 23502

New Orleans, Louisiana  
April 25, 2013