U.S. DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA
2023 JUN -9 P 2:
CAROL L.

SEALED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

SECOND SUPERSEDING INDICTMENT FOR VIOLATIONS OF THE FEDERAL GUN CONTROL ACT, THE FEDERAL CONTROLLED SUBSTANCES ACT, AND POSSESSION OF GOODS STOLEN FROM INTERSTATE SHIPMENT

UNITED STATES OF AMERICA	*	**CRIMINAL NO. 23-79**	
v.	*	**SECTION: "A"**	
JONATHAN GONZALEZ	*	**VIOLATIONS**	**18 U.S.C. § 2**
ANTHONY ROMAN			**18 U.S.C. § 659**
DARNELL MELTON	*		**18 U.S.C. § 922(g)(1)**
[redacted]			**18 U.S.C. § 924(a)(8)**
MARK WILLIAMS	*		**18 U.S.C. § 924(o)**
RONALD JOHNSON			**18 U.S.C. § 924(c)(1)(A)(i)**
[redacted]	*		**21 U.S.C. § 841(a)(1)**
			21 U.S.C. § 841(b)(1)(A)
	*		**21 U.S.C. § 841(b)(1)(B)**
			21 U.S.C. § 841(b)(1)(C)
	*		**21 U.S.C. § 841(b)(1)(D)**
			21 U.S.C. § 841(b)(2)
	*		**21 U.S.C. § 846**
			21 U.S.C. § 856(a)(1)

* * *

The Grand Jury charges that:

COUNT 1

(Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances)

Beginning at a time unknown and continuing to on or about May 19, 2023, in the Eastern

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District of Louisiana and elsewhere, the defendants, **JONATHAN GONZALEZ, ANTHONY ROMAN, DARNELL MELTON, MARK WILLIAMS, RONALD JOHNSON,** [redacted] and [redacted] did knowingly and intentionally combine, conspire, confederate and agree with other persons known and unknown to the Grand Jury to distribute and to possess with intent to distribute controlled substances, to wit: cocaine hydrochloride, N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), and tapentadol, all Schedule II controlled substances; marijuana, a Schedule I controlled substance; and tramadol, a Schedule IV controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

Quantity of Controlled Substances Involved in the Conspiracy

With respect to defendant **JONATHAN GONZALEZ**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him is:

(1) a quantity of a mixture and substance containing a detectable amount of tapentadol, in violation of Title 21, United States Code, Section 841(b)(1)(C);

(2) a quantity of a mixture and substance containing a detectable amount of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(D); and

(3) a quantity of a mixture and substance containing a detectable amount of tramadol, in violation of Title 21, United States Code, Section 841(b)(2).

With respect to defendant **ANTHONY ROMAN**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him is:

(1) 40 grams or more of a mixture and substance containing a detectable amount of

N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), in violation of Title 21, United States Code, Section 841(b)(1)(B);

(2) a quantity of a mixture and substance containing a detectable amount of cocaine hydrochloride in violation of Title 21, United States Code, Section 841(b)(1)(C);

(3) a quantity of a mixture and substance containing a detectable amount of tapentadol in violation of Title 21, United States Code, Section 841(b)(1)(C);

(4) a quantity of a mixture and substance containing a detectable amount of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(D); and

(5) a quantity of a mixture and substance containing a detectable amount of tramadol, in violation of Title 21, United States Code, Section 841(b)(2).

With respect to defendant **DARNELL MELTON**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him is:

(1) a quantity of a mixture and substance containing a detectable amount of tapentadol, in violation of Title 21, United States Code, Section 841(b)(1)(C); and

(2) a quantity of a mixture and substance containing a detectable amount of tramadol, in violation of Title 21, United States Code, Section 841(b)(2).

With respect to defendant **MARK WILLIAMS**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him is:

(1) a quantity of a mixture and substance containing a detectable amount of tapentadol, in violation of Title 21, United States Code, Section 841(b)(1)(C);

(2) a quantity of a mixture and substance containing a detectable amount of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(D); and

(3) a quantity of a mixture and substance containing a detectable amount of tramadol, in violation of Title 21, United States Code, Section 841(b)(2).

With respect to defendant **RONALD JOHNSON**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him is:

(1) 40 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), in violation of Title 21, United States Code, Section 841(b)(1)(B);

(2) a quantity of a mixture and substance containing a detectable amount of cocaine hydrochloride in violation of Title 21, United States Code, Section 841(b)(1)(C);

(3) a quantity of a mixture and substance containing a detectable amount of tapentadol, in violation of Title 21, United States Code, Section 841(b)(1)(C); and

(4) a quantity of a mixture and substance containing a detectable amount of tramadol, in violation of Title 21, United States Code, Section 841(b)(2).

With respect to defendant [redacted] the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him is:

(1) five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A);

(2) 40 grams or more of a mixture and substance containing a detectable amount of

N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), in violation of Title 21, United States Code, Section 841(b)(1)(B);

(3) a quantity of a mixture and substance containing a detectable amount of tapentadol, in violation of Title 21, United States Code, Section 841(b)(1)(C); and

(4) a quantity of a mixture and substance containing a detectable amount of tramadol, in violation of Title 21, United States Code, Section 841(b)(2).

With respect to defendant [redacted] the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him is:

(1) a quantity of a mixture and substance containing a detectable amount of cocaine hydrochloride, in violation of Title 21, United States Code, Section 841(b)(1)(C);

(2) a quantity of a mixture and substance containing a detectable amount of tapentadol, in violation of Title 21, United States Code, Section 841(b)(1)(C); and

(3) a quantity of a mixture and substance containing a detectable amount of tramadol, in violation of Title 21, United States Code, Section 841(b)(2).

All in violation of Title 21, United States Code, Section 846.

COUNT 2
(Conspiracy to Possess Firearms in Furtherance of Drug Trafficking)

Beginning at a time unknown and continuing to on or about May 19, 2023, in the Eastern District of Louisiana and elsewhere, the defendants, **JONATHAN GONZALEZ, ANTHONY ROMAN, MARK WILLIAMS, RONALD JOHNSON,** [redacted] and [redacted] did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons known and unknown to the Grand Jury, to possess firearms in

furtherance of a drug trafficking crime, to wit: the conspiracy to distribute controlled substances, as alleged in Count 1, in violation of Title 18, United States Code, Section 924(o).

COUNT 3
(Possession with the Intent to Distribute Marijuana)

On or about January 29, 2023, in the Eastern District of Louisiana, the defendant, **JONATHAN GONZALEZ**, did knowingly and intentionally possess with the intent to distribute a quantity of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D).

COUNT 4
(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about January 29, 2023, in the Eastern District of Louisiana, the defendant, **JONATHAN GONZALEZ**, did knowingly possess a firearm, to wit: a Glock 19 Gen5, 9mm semi-automatic pistol, bearing serial number BXRC198, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: possession with the intent to distribute marijuana, as charged in Count 3 of this Second Superseding Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 5
(Possession of Goods Stolen From Interstate Shipment)

On or about January 29, 2023, in the Eastern District of Louisiana, the defendants **JONATHAN GONZALEZ** and **ANTHONY ROMAN**, knowingly, did have in their possession goods and chattels of a value in excess of $1000.00, that is, a 2023 Infiniti QX80 SUV, Vehicle Identification Number (VIN) JN8AZ2AF0P9756110, which had been embezzled and stolen from the Norfolk Southern Automotive Distribution Facility, 3400 Almonaster Avenue, New Orleans, Louisiana 70126, a storage facility, station, platform, depot, container freight station, and freight

consolidation facility, while moving in interstate commerce from Los Angeles, California to Baton Rouge, Louisiana, knowing the said goods and chattels to be embezzled and stolen, in violation of Title 18, United State Code, Sections 659 and 2.

COUNT 6
(Possession with the Intent to Distribute Tapentadol and Marijuana)

On or about March 28, 2023, in the Eastern District of Louisiana, the defendant, **ANTHONY ROMAN**, did knowingly and intentionally possess with the intent to distribute a quantity of a mixture and substance containing a detectable amount of tapentadol, a Schedule II controlled substance, and a quantity of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 841(b)(1)(D).

COUNT 7
(Felon in Possession of a Firearm)

On or about March 28, 2023, in the Eastern District of Louisiana, the defendant, **DARNELL MELTON**, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: a conviction on April 23, 2013, in Orleans Parish Criminal District Court, State of Louisiana, Case No. 512732, for simple robbery in violation of La. R.S. 14:65; a conviction on June 24, 2014, in the 22nd Judicial District Court, State of Louisiana, Case No. 546115, for attempted possession of a firearm by a felon in violation of La. R.S. 14:(27)95.1; and a conviction on March 28, 2019, in the 24th Judicial District Court, State of Louisiana, Case No. 19-0081, for simple burglary in violation of La. R.S. 14:62, did knowingly possess a firearm, to wit: a Glock 17 Gen5, 9mm semi-automatic pistol, bearing serial number BNHS395; a Glock 27 Gen4, .40 caliber semi-automatic pistol, bearing serial number SXP465; a Smith & Wesson SD9 VE, 9mm semi-automatic pistol, bearing serial number

FWJ4934; an Anderson Manufacturing AM-15 pistol, bearing serial number 21366223; and an Anderson Manufacturing AM-15 pistol, bearing serial number 21211663, said firearm having been in and affecting interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(8), and 2.

COUNT 8
(Possession with the Intent to Distribute Tapentadol and Marijuana)

On or about March 28, 2023, in the Eastern District of Louisiana, the defendant, [redacted] did knowingly and intentionally possess with the intent to distribute a quantity of a mixture and substance containing a detectable amount of tapentadol, a Schedule II controlled substance, and a quantity of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 841(b)(1)(D).

COUNT 9
(Felon in Possession of a Firearm)

On or about March 28, 2023, in the Eastern District of Louisiana, the defendant, [redacted] knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: a conviction on December 13, 2010, in the Orleans Parish Criminal District Court, State of Louisiana, Case No. 496121, for simple burglary in violation of La. R.S. 14:62; a conviction on December 16, 2011, in the Orleans Parish Criminal District Court, State of Louisiana, Case No. 508721, for sale/distribution/possession of legend drug without prescription in violation of La. R.S. 40:1238.1; and a conviction on May 24, 2017, in the Orleans Parish Criminal District Court, State of Louisiana, Case No. 530001, for possession of a firearm by a felon in violation of La. R.S. 14:95.1, did knowingly possess a firearm, to wit: : a Glock 17 Gen5, 9mm semi-automatic pistol, bearing serial number BNHS395; a Glock 27 Gen4, .40 caliber semi-

automatic pistol, bearing serial number SXP465; a Smith & Wesson SD9 VE, 9mm semi-automatic pistol, bearing serial number FWJ4934; an Anderson Manufacturing AM-15 pistol, bearing serial number 21366223; and an Anderson Manufacturing AM-15 pistol, bearing serial number 21211663, said firearm having been in and affecting interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(8), and 2.

COUNT 10
(Possession with the Intent to Distribute Tapentadol and Marijuana)

On or about May 17, 2023, in the Eastern District of Louisiana, the defendants, **JONATHAN GONZALEZ** and **MARK WILLIAMS**, did knowingly and intentionally possess with the intent to distribute a quantity of a mixture and substance containing a detectable amount of tapentadol, a Schedule II controlled substance, and a quantity of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 11
(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about May 17, 2023, in the Eastern District of Louisiana, the defendants, **JONATHAN GONZALEZ** and **MARK WILLIAMS**, did knowingly possess a firearm, to wit: an ABC Rifle Company AR-15 .223/5.56mm caliber semi-automatic pistol, bearing serial number 77-10303; a Glock 23 Gen5, .40 caliber semi-automatic pistol, bearing serial number AHAS731; and a Glock semi-automatic pistol, bearing serial number KVR840, in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: possession with the intent to distribute tapentadol and marijuana, as charged in Count 10 of this

Second Superseding Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.

COUNT 12

(Possession with Intent to Distribute Fentanyl, Cocaine, Tapentadol, and Tramadol)

On or about May 19, 2023, in the Eastern District of Louisiana, the defendants, **ANTHONY ROMAN, RONALD JOHNSON**, and [redacted] did knowingly and intentionally possess with the intent to distribute 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 controlled substance; a quantity of a mixture and substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance; a quantity of a mixture and substance containing a detectable amount of tapentadol, a Schedule II controlled substance; and a quantity of a mixture and substance containing a detectable amount of tramadol, a Schedule IV controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), 841(b)(1)(C), and 841(b)(2), and Title 18, United States Code, Section 2.

COUNT 13

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

On or about May 19, 2023, in the Eastern District of Louisiana, the defendants, **ANTHONY ROMAN, RONALD JOHNSON**, and [redacted] did knowingly possess a firearm, to wit: a Century Arms Micro VSKA, 7.62x39mm caliber semi-automatic pistol, bearing serial number MSV700588; a Century Arms C39, 7.62x39mm caliber semi-automatic pistol, bearing serial number 39CTM03754; an American Tactical MilSport 300BLK semi-automatic pistol, bearing serial number MSA075341; a Glock 19 Gen5, 9mm semi-automatic pistol, bearing serial number BXFY031; and a Glock 23 Gen5, .40 caliber semi-automatic pistol, bearing serial number BWHU565, in furtherance of a drug trafficking crime for which they may be prosecuted

in a court of the United States, to wit: possession with the intent to distribute fentanyl, cocaine, tapentadol, and tramadol, as charged in Count 12 of this Second Superseding Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.

COUNT 14
(Using or Maintaining Drug Premises)

Beginning at a time unknown and continuing to on or about May 19, 2023, in the Eastern District of Louisiana, the defendants, **ANTHONY ROMAN**, **RONALD JOHNSON**, and [redacted] did unlawfully and knowingly use and maintain a place located at 5400 North Rampart Street, New Orleans, Louisiana 70117 for the purpose of distributing controlled substances, in violation of Title 21, United States Code, Section 856(a)(1).

COUNT 15
(Felon in Possession of a Firearm)

On or about May 19, 2023, in the Eastern District of Louisiana, the defendant, **RONALD JOHNSON**, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: a conviction on October 23, 2018, in the Orleans Parish Criminal District Court, State of Louisiana, Case No. 528731, for first degree robbery in violation of La. R.S. 14:64.1, did knowingly possess a firearm, to wit: a Century Arms Micro VSKA, 7.62x39mm caliber semi-automatic pistol, bearing serial number MSV700588; a Century Arms C39, 7.62x39mm caliber semi-automatic pistol, bearing serial number 39CTM03754; an American Tactical MilSport 300BLK semi-automatic pistol, bearing serial number MSA075341; a Glock 19 Gen5, 9mm semi-automatic pistol, bearing serial number BXFY031; and a Glock 23 Gen5, .40 caliber semi-automatic pistol, bearing serial number BWHU565, said firearm having been in and affecting interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

NOTICE OF FORFEITURE

1. The allegations of Counts 1 through 15 of this Second Superseding 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 offenses alleged in Counts 2, 4, 7, 9, 11, 13, and 15, the defendants, **JONATHAN GONZALEZ, ANTHONY ROMAN, DARNELL MELTON,** [redacted], **MARK WILLIAMS, RONALD JOHNSON,** [redacted] and [redacted] 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 the following:

Glock 19 Gen5, 9mm semi-automatic pistol, bearing serial number BXRC198;

Glock 17 Gen5, 9mm semi-automatic pistol, bearing serial number BNH5395;

Glock 27 Gen4, .40 caliber semi-automatic pistol, bearing serial number SXP465;

Smith & Wesson SD9 VE, 9mm semi-automatic pistol, bearing serial number FWJ4934;

Anderson Manufacturing AM-15 pistol, bearing serial number 21366223;

Anderson Manufacturing AM-15 pistol, bearing serial number 21211663;

Glock 23 Gen5, .40 caliber semi-automatic pistol, bearing serial number AHAS731;

ABC Rifle Company AR-15 .223/5.56mm caliber semi-automatic pistol, bearing serial number 77-10303;

Glock semi-automatic pistol, bearing serial number KVR840;

Glock 19 Gen5, 9mm semi-automatic pistol, bearing serial number BXFY031;

Glock 23 Gen5, .40 caliber semi-automatic pistol, bearing serial number BWHU565;

Century Arms Micro VSKA, 7.62x39mm caliber semi-automatic pistol, bearing serial number MSV700588;

Century Arms C39, 7.62x39mm caliber semi-automatic pistol, bearing serial number 39CTM03754; and

American Tactical MilSport 300BLK semi-automatic pistol, bearing serial number MSA075341.

3. As a result of the offenses alleged in Counts 1, 3, 6, 8, 10, 12, and 14, the defendants, **JONATHAN GONZALEZ, ANTHONY ROMAN, DARNELL MELTON,** [redacted] **MARK WILLIAMS, RONALD JOHNSON,** [redacted] and [redacted] 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 offenses, and any property, used or intended to be used, in any manner or part to commit or to facilitate the commission of said offenses.

4. As a result of the offense alleged in Count 5, the defendants, **JONATHAN GONZALEZ** and **ANTHONY ROMAN**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from, proceeds traceable to said offense, including but not limited to the following:

2023 Infiniti QX80 SUV, Vehicle Identification Number (VIN) JN8AZ2AF0P9756110.

5. 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;

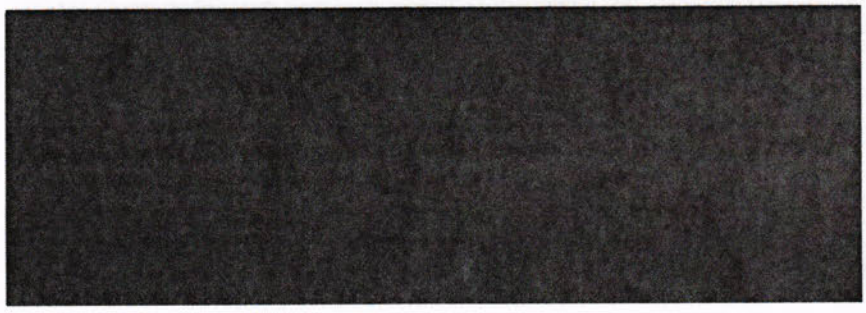
b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond 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.



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New Orleans, Louisiana
June 9, 2023

FORM OBD-34
No. 23-79 "A"

UNITED STATES DISTRICT COURT

Eastern *District of* Louisiana

Criminal *Division*

THE UNITED STATES OF AMERICA

vs.

JONATHAN GONZALEZ
ANTHONY ROMAN
DARNELL MELTON
[redacted]
MARK WILLIAMS
RONALD JOHNSON
[redacted]

SECOND SUPERSEDING INDICTMENT

FOR VIOLATIONS OF THE FEDERAL GUN CONTROL ACT, THE FEDERAL CONTROLLED SUBSTANCES ACT AND POSSESSION OF GOODS STOLEN FROM INTERSTATE SHIPMENT

VIOLATIONS:

Title 18, U.S.C., Sections 2, 659, 922(g)(1), 924(a)(8)
Title 18, U.S.C., Sections 924(c)(1)(A)(i), 924(o)
Title 21, U.S.C., Sections 841(a)(1), 841(b)(1)(A)
Title 21, U.S.C., Sections 841(b)(1)(B), 841(b)(1)(C)
Title 21, U.S.C., Sections 841(b)(1)(D), 841(b)(2)
Title 21, U.S. C., Sections 846, 856(a)(1)

[redacted]

Filed in open court this _____ *day of* _____ *A.D. 2023.*

_____
Clerk

Bail, $ _____

DAVID M. BERMAN
Assistant United States Attorney