

FILED
2004 Aug - 5
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**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA**

**SUPERSEDING INDICTMENT FOR DISTRIBUTION AND
POSSESSION WITH THE INTENT TO DISTRIBUTE CONTROLLED
SUBSTANCE ANALOGUES AND FORFEITURE ALLEGATION**

UNITED STATES OF AMERICA

versus

MICHAEL JAMES BURTON d/b/a

AMERICAN CHEMICAL SUPPLY d/b/a

WWW.AMERICANCHEMICALSUPPLY.COM

and KEITH RUSSART

CRIMINAL NO. 04-80-B-Mi

21 U.S.C. § 841(a)(1)

21 U.S.C. § 813

21 U.S.C. §802(32)(A)

18 U.S.C. § 2

21 U.S.C. § 853

THE GRAND JURY CHARGES:

COUNT ONE

On or about March 8, 2004, in the Middle District of Louisiana, MICHAEL JAMES BURTON d/b/a AMERICAN CHEMICAL SUPPLY d/b/a WWW.AMERICANCHEMICALSUPPLY.COM and KEITH RUSSART, defendants herein, knowingly and intentionally did distribute and possess with intent to distribute a mixture containing 2C-T-2 1 [2,5-Dimethoxy-4- (2-fluoroethylthio) Phenethylamine HCL] and a mixture containing TAP [1-(5-Indanyl)-2-aminopropane], controlled substance analogues as defined by Title 21, United States Code, Section 802(32)(A), knowing that the substances were intended for human consumption.

James E. Downs died as a result of using the mixture of 2C-T-21 that the defendants distributed to him.

The above is a violation of Title 21, United States Code, Sections 813, 841(a)(1), 841(b)(1)(C) and 802(32)(A).

COUNT TWO

On or about April 12, 2004, in the Middle District of Louisiana, MICHAEL

JAMES BURTON d/b/a AMERICAN CHEMICAL SUPPLY, d/b/a WWW.AMERICANCHEMICALSUPPLY.COM, and KEITH RUSSART, defendants herein, knowingly and intentionally did distribute and possess with the intent to distribute a mixture containing 5-MeO-DMT (5-Methoxy-N,N-dimethyltryptamine), a mixture containing 1AP [1-(5-Indanyl)-2-aminopropane], and a mixture containing 2C-T-21 [2,5-Dimethoxy-4-(2-fluoroethylthio) Phenethylamine HCL], controlled substance analogues as defined by Title 21, United States Code, Section 802(32)(A), knowing that the substances were intended for human consumption.

The above is a violation of Title 21, United States Code, Sections 813, 841(a)(1) and 802(32)(A)

COUNT THREE

On or about May 21, 2004, in the Middle District of Louisiana, MICHAEL JAMES BURTON, d/b/a AMERICAN CHEMICAL SUPPLY d/b/a WWW.AMERICANCHEMICALSUPPLY.COM, and KEITH RUSSART, defendants herein, knowingly and intentionally did distribute and possess with the intent to distribute a mixture containing 2C-T-2, (2,5-Dimethoxy-4-ethylthiophenethylamine HCl), a mixture containing 2C-I, (2,5-Dimethoxy-4-iodophenethylamine HCl), a mixture containing 2C-T-21 [2,5-Dimethoxy-4-(2-fluoroethylthio) Phenethylamine HCL], and a mixture containing DPT (N,N-Dipropyltryptamine HCl), controlled substance analogues as defined by Title 21, United States Code, Section 802(32)(A), knowing that the substances were intended for human consumption.

The above is a violation of Title 21, United States Code, Sections 813, 841(a)(1) and 802(32)(A).

COUNT FOUR

On or about July 10, 2004, in the Middle District of Louisiana, MICHAEL JAMES BURTON, d/b/a AMERICAN CHEMICAL SUPPLY d/b/a WWW.AMERICANCHEMICALSUPPLY.COM, and KEITH RUSSART, defendants herein, knowingly and intentionally did distribute and possess with the intent to distribute a mixture containing 2C-E, (2,5-Dimethoxy-4-ethylphenethylamine), and a mixture containing 2C-T-21 [2,5-Dimethoxy-4-(2-fluoroethylthio) Phenethylamine HCL], controlled substance analogues as defined by Title 21, United States Code, Section 802(32)(A), knowing that the substances were intended for human consumption.

The above is a violation of Title 21, United States Code, Sections 813, 841(a)(1) and 802(32)(A)

FORFEITURE ALLEGATION

As a result of the felony offenses alleged in Counts One, Two, Three, and Four of this Indictment and upon conviction of one or more of these offense, MICHAEL JAMES BURTON, d/b/a AMERICAN CHEMICAL SUPPLY d/b/a WWW.AMERICANCHEMICALSUPPLY.COM. and KEITH RUSSART, the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all (1) property constituting, or derived from, any proceeds the defendants obtained directly or indirectly as a result of the said violations, and (2) 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.

In commission of the violations charged in Counts One, Two, Three, and Four, the defendants, MICHAEL JAMES BURTON, d/b/a AMERICAN CHEMICAL SUPPLY d/b/a WWW.AMEMCANCHEMICALSUPPLY.COM, and KEITH RUSSART, used the following property to commit, and to facilitate the commission of the said violations, thereby subjecting the property to forfeiture to the United States of America pursuant to Title 21, United States Code, Section 853 (a):

(1) the internet domain name
WWW.AMERICANCHEMIICALSUPPLY.COM.

UNITED STATES OF AMERICA, by
DAVID R DUGAS
GRAND JURY FOREMAN
UNITED STATES ATTORNEY
MIDDLE DISTRICT OF LOUISIANA
JENNIFER M. KLEINPETER
ASSISTANT UNITED STATES ATTORNEY

A TRUE BILL