

UNITED STATES DISTRICT COURT
for the
District of Minnesota

UNITED STATES OF AMERICA

v.

Case No. B. ms. 320 JG

CHANDAN PRENTISS HURD,

CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about March 23, 2013, in Hennepin County, in the State and District of Minnesota, defendant

having previously been convicted in Hennepin County District Court on or about November 15, 2006 of Assault in the First Degree and Attempted Murder in the Second Degree, each crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate and foreign commerce a firearm, namely, a Shooters Arm Manufacturing Inc., model Titan FX45 Titan, .45 caliber pistol, serial number TB100572

in violation of Title 18, United States Code, Section(s) 922(g)(1) and 924(a)(2).

I further state that I am a Task Force Officer (TFO) with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: Yes No

 #548
Complainant's signature

JOHN BIEDERMAN, Task Force Officer
Printed name and title

Sworn to before me and signed in my presence.

Date: 5/10/13


Judge's signature

City and state: St. Paul, MN

The Honorable Jeanne J. Graham
Printed name and title



STATE OF MINNESOTA)
) ss. AFFIDAVIT OF JOHN BIEDERMAN
COUNTY OF HENNEPIN)

1. I am a Task Force Officer (TFO) with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), and have been employed as a Minneapolis Police Officer since 1998. I am currently assigned to the St. Paul Group IV Field Office and the Minneapolis Police Weapons Unit. My duties and responsibilities include conducting criminal investigations of individuals and organizations who are alleged to have violated Federal laws, particularly those found in Titles 18, 21, and 26. I have participated in numerous investigations which have resulted in the arrests, searches, seizures, and convictions of individuals who have violated Federal law.

2. The facts set forth in the Affidavit are based upon my review of reports, my personal investigation, and discussions I have had with other law enforcement personnel.

3. This Affidavit is made for the purpose of establishing probable cause in support of a federal arrest warrant for HURD and therefore contains only a summary of relevant facts. Based upon all the facts and information set forth in this Affidavit, I believe that probable cause exists to support that, on or about March 23, 2013, in the city of Minneapolis, Hennepin County, in the State and District of Minnesota, HURD, having previously been convicted in Hennepin County District Court on or about November 15, 2006, of Assault in the First Degree and Attempted Murder in the Second Degree, each

crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate and foreign commerce a firearm, namely, a Shooters Arm Manufacturing Inc., model Titan FX45 Titan, .45 caliber pistol, serial number TB100572.

4. On March 23, 2013, at approximately 0018 hours, Minneapolis Police Department (MPD) Officers noticed a car stopped in the middle of the road near the intersection of Buchanan and Broadway Streets Northeast, with an individual, HURD, standing next to the car. Suspecting a narcotics hand to hand transaction or motorist car trouble, the officers turned their squad car onto Buchanan Street Northeast and stopped a distance behind the car. HURD approached the squad car with his hands in his pockets. The officers then exited the squad car and, concerned for their safety, ordered HURD to take his hands out of his pockets. HURD told the officers there was no problem there and continued to approach the officers with his hands in his pockets. A struggle ensued, with officers attempting to remove HURD's hands from his pockets. During the struggle, one officer observed a gun handle sticking out of HURD's right pocket and called out his observation to his partner. After backup arrived, the officers found in HURD's pocket a loaded Arms Manufacturing Inc., model Titan FX45 Titan, .45 caliber handgun bearing serial number TB100572 (hereinafter "Pistol").

5. The officers later learned that HURD had a Department of Corrections warrant for second degree attempted murder.

6. I reviewed HURD's criminal history and determined that, prior to March 23, 2013, HURD was a convicted felon and was prohibited from possessing firearms. Specifically, HURD had the following felony convictions, among others: attempted murder in the second degree and assault in the first degree (Hennepin County District Court, 2006). Both of these crimes are punishable by imprisonment for a term exceeding one year.

7. An ATF interstate nexus expert reviewed reports given to her by me regarding the Pistol. Based on her training and experience, the expert determined that the Pistol was manufactured in the Philippines and imported into the United States at Rochester, New York. Therefore, at some point after manufacture, the Pistol was shipped or transported into Minnesota through interstate and foreign commerce prior to HURD's possession of the Pistol on March 23, 2013.

8. Based upon the facts conveyed in this affidavit, I have probable cause to believe that on March 23, 2013, CHANDAN PRENTISS HURD committed the crime of

being a felon in possession of a firearm, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

Further your Affiant sayeth not.

 #578

JOHN BIEDERMAN
Task Force Officer

SUBSCRIBED and SWORN to before me

this 10th day of May, 2013.



THE HONORABLE JEANNE J. GRAHAM