

**FILED**  
U.S. DISTRICT COURT  
EASTERN DISTRICT ARKANSAS

OCT - 5 2017

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS

JAMES W. McCOORMACK, CLERK  
By: [Signature] DEP CLERK

UNITED STATES OF AMERICA

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No. 4:17CR 00298 BSM

v.

) 21 U.S.C. § 841(a)(1), (b)(1)(C)  
) 18 U.S.C. § 922(g)(1)

ROBERT CARROLL TURPIN, III

INDICTMENT

**COUNT 1**

On or about September 13, 2017, in the Eastern District of Arkansas, the defendant,

ROBERT CARROLL TURPIN, III

knowingly and intentionally possessed with intent to distribute methamphetamine and cocaine, Schedule II controlled substances, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

**COUNT 2**

A. Prior to September 13, 2017, the defendant, ROBERT CARROLL TURPIN, III, had been convicted of one or more of the following offenses: Possession of a Counterfeit Substance; 203rd District Court Dallas, TX, case number F-0416088, June 8, 2005; Fraudulent Use of a Credit Card, Arkansas County District Court, case number 2006-182, June 6, 2007; and

B. The crimes set forth in paragraph A above were punishable by a term of imprisonment exceeding one year.

C. On or about September 13, 2017, in the Eastern District of Arkansas,

ROBERT CARROLL TURPIN, III

did knowingly possess one or more of the following in and affecting commerce, to wit: one Ruger AR556 assault rifle, SN#850-94242; one Braztech L.C. 410 Shotgun, SN#SP561566; one Norinco semi-automatic rifle, SN#1725913; one Glock 43 semi-automatic pistol, SN#ZSM486; and assorted ammunition located at 11718 Ashwood Drive, Little Rock, Arkansas, in violation of Title 18, United States Code, Section 922(g)(1).

### **FORFEITURE ALLEGATION 1**

Upon conviction of the offenses alleged in Count 1 of this Indictment, the defendant shall forfeit to the United States, under 18 U.S.C. § 924(d), 21 U.S.C. § 853, and 28 U.S.C. § 2461(c), all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense, including, but not limited to, the following: one Ruger AR556 assault rifle, SN#850-94242; one Braztech L.C. 410 Shotgun, SN#SP561566; one Norinco semi-automatic rifle, SN#1725913; one Glock 43 semi-automatic pistol, SN#ZSM486; and all ammunition and any other firearms and firearm components located at 11718 Ashwood Drive, Little Rock, Arkansas on September 13, 2017.

### **FORFEITURE ALLEGATION 2**

Upon conviction of the offense alleged in Count 2 of this Indictment, the defendant shall forfeit to the United States, under 18 U.S.C. § 924(d), 21 U.S.C. § 853, and 28 U.S.C. §2461(c), all firearms and ammunition involved in the commission of the offense, including, but not limited to, the following: one Ruger AR556 assault rifle, SN#850-94242; one Braztech L.C. 410 Shotgun,

SN#SP561566; one Norinco semi-automatic rifle, SN#1725913; one Glock 43 semi-automatic pistol, SN#ZSM486; and all ammunition and any other firearms and firearm components located at 11718 Ashwood Drive, Little Rock, Arkansas on September 13, 2017.

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