

**FELONY**

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

**INDICTMENT FOR VIOLATIONS OF THE FEDERAL  
CONTROLLED SUBSTANCES ACT AND THE FEDERAL GUN CONTROL ACT**

**UNITED STATES OF AMERICA**

\*

**CRIMINAL DOCKET NO:**

**v.**

\*

**SECTION:**

**DARION TINSON**

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**VIOLATIONS: 21 U.S.C. § 841(a)(1)  
21 U.S.C. § 841(b)(1)(C)  
21 U.S.C. § 846  
18 U.S.C. § 924(c)(1)(A)  
18 U.S.C. § 922(g)(1)  
18 U.S.C. § 924(a)(2)**

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The Grand Jury charges that:

**COUNT 1**

Beginning on a date unknown, and continuing until on or about August 20, 2015, in the Eastern District of Louisiana, and elsewhere, the defendant, **DARION TINSON**, 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 the intent to distribute a quantity of a mixture or substance containing a detectable amount of heroin, a Schedule I drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); all in violation of Title 21, United States Code, Section 846.

**COUNT 2**

On or about August 20, 2015, in the Eastern District of Louisiana, the defendant, **DARION TINSON**, did knowingly and intentionally possess with the intent to distribute a quantity of a mixture or substance containing a detectable amount of heroin, a Schedule I drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT 3**

On or about August 20, 2015, in the Eastern District of Louisiana, the defendant, **DARION TINSON**, did knowingly and intentionally possess a firearm 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 heroin, as set forth in Count 2, which is incorporated herein; all in violation of Title 18, United States Code, Section 924(c)(1)(A).

**COUNT 4**

On or about August 20, 2015, in the Eastern District of Louisiana, the defendant, **DARION TINSON**, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: a conviction on July 12, 2011, in case number 347-721 in the 34th Judicial District Court for the Parish of St. Bernard, State of Louisiana, for Possession of a Schedule I Controlled Dangerous Substance, to wit: heroin, in violation of La. R.S. 40:966, did knowingly possess in and affecting interstate commerce a firearm, to wit: a Taurus, .45 caliber semi-automatic pistol, bearing serial number NGT36516, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**NOTICE OF DRUG 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, **DARION TINSON**, 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 and 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 act or omission of the defendant:

- 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.

### **NOTICE OF GUN FORFEITURE**

1. The allegations of Counts 3 and 4 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 18, United States Code, Sections 922(g), 924(c)(1)(A), and 924(d)(1), made applicable through Title 28, United States Code, Section 2461.

2. As a result of the offenses alleged in Counts 3 and 4, the defendant, **DARION TINSON**, shall forfeit to the United States pursuant to Title 18, United States Code, Sections 922(g), 924(c)(1)(A), and 924(d)(1), made applicable through Title 28, United States Code, Section 2461, any firearm or ammunition, which was involved in or used in knowing violations of Title 18, United States Code, Sections 922(g)(1) and 924(c)(1)(A), as alleged in Counts 3 and 4 of the Indictment.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, as a result of any act or omission of the defendant:

- 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 18, United States Code, Sections 922(g), 924(c)(1)(A) and 924(d)(1), made applicable through Title 28, United States Code, Section 2461.

A TRUE BILL:

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FOREPERSON

KENNETH ALLEN POLITE, JR.  
UNITED STATES ATTORNEY



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DAVID HALLER  
Assistant United States Attorney

New Orleans, Louisiana  
September 3, 2015