

FILED  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF LA.

2022 MAR -3 P 3:39

CAROL L. MICHEL  
CLERK

**FELONY**

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

**BILL OF INFORMATION FOR TRAVEL WITH INTENT TO ENGAGE IN  
ILLICIT SEXUAL CONDUCT WITH A MINOR**

**UNITED STATES OF AMERICA**

\*

**CRIMINAL DOCKET NO. 22-39**

v.

\*

**SECTION: SECT. MMAG.4**

**GRAHAM LOVELACE**

\*

**VIOLATION: 18 U.S.C. § 2423(b)**

\* \* \*

The United States Attorney charges that:

**COUNT 1**

Beginning on or about October 6, 2021, and continuing until on or about October 7, 2021, in the Eastern District of Louisiana and elsewhere, the defendant, **GRAHAM LOVELACE**, did travel in interstate commerce, for the purpose of engaging in any illicit sexual conduct, as that term is defined in Title 18, United States Code, Section 2423(f), with another person, to wit: **GRAHAM LOVELACE** traveled from Greenville, South Carolina to Belle Chasse, Louisiana, Harvey, Louisiana, and New Orleans, Louisiana, which are within the Eastern District of Louisiana, by automobile for the purpose of engaging in sexual conduct with a fifteen-year-old minor, in violation of Title 18, United States Code, Section 2423(b).

X Fee WA  
Process  
X Dkt'd  
CtRmDep  
Doc. No.

**NOTICE OF FORFEITURE**

1. The allegations of Count 1 of this Bill of Information are incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States.

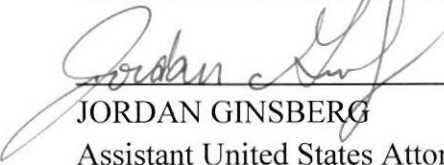
2. As a result of the offense alleged in Count 1, the defendant, **GRAHAM LOVELACE**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property real or personal which constitutes or is derived from proceeds traceable to said offense.

3. If any of the above-described property, 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;

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 defendant up to the value of said property.

DUANE A. EVANS  
UNITED STATES ATTORNEY

  
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JORDAN GINSBERG  
Assistant United States Attorney  
Illinois Bar No. 6282956

  
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MELISSA E. BÜCHER  
Assistant United States Attorney  
Louisiana Bar No. 36400

New Orleans, Louisiana  
March 3, 2022