

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

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

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

UNITED STATES OF AMERICA

*

CRIMINAL NO.

23-00016

v.

*

SECTION:

SECT. RMAG. 2

TOWNSEND GRANT

*

VIOLATIONS:

- 18 U.S.C. § 922(o)
- 18 U.S.C. § 924(c)(1)(A)(i)
- 18 U.S.C. § 924(c)(1)(B)(ii)
- 21 U.S.C. § 841(a)(1)
- 21 U.S.C. § 841(b)(1)(C)

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The Grand Jury charges that:

COUNT 1
(Possession of a Machine Gun)

On or about December 14, 2022, in the Eastern District of Louisiana, the defendant, **TOWNSEND GRANT**, did knowingly possess a machinegun, that is, a Glock Model 22C, 40 caliber handgun, bearing serial numbers [REDACTED], with a Glock auto-sear, in violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

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Doc.No. _____

COUNT 2
(Possession with the Intent to Distribute Heroin)

On or about December 14, 2022, in the Eastern District of Louisiana, the defendant, **TOWNSEND GRANT**, 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 II Controlled Dangerous Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 3
(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about December 14, 2022, in the Eastern District of Louisiana, the defendant, **TOWNSEND GRANT**, did knowingly possess firearms, that is, a Ruger Super Hawk Revolver, bearing serial number [REDACTED] and a Romarm Mini Draco, bearing serial number [REDACTED] [REDACTED] in furtherance of a drug trafficking crime, for which he may be prosecuted in a court of the United States, that is, possession with the intent to distribute a quantity of a mixture or substance containing a detectable amount of heroin, as alleged in Count 2 of this Indictment, in violation of Title 18, United States code, Section 924(c)(1)(A)(i).

COUNT 4
(Possession of a Machinegun in Furtherance of a Drug Trafficking Crime)

On or about December 14, 2022, in the Eastern District of Louisiana, the defendant, **TOWNSEND GRANT**, did knowingly possess a machinegun, that is, a Glock Model 22C. 40 caliber handgun, bearing serial numbers [REDACTED] with a Glock auto-sear, in furtherance of a drug trafficking crime, for which he may be prosecuted in a court of the United States, that is, possession with the intent to distribute a quantity of a mixture or substance containing a detectable amount of heroin, as alleged in Count 2 of this Indictment, in violation of Title 18, United States code, Section 924(c)(1)(B)(ii).

NOTICE OF FORFEITURE

1. The allegations of Counts 1 through 4 of this Indictment 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 offenses alleged in Counts 1, 3, and 4, the defendant, **TOWNSEND GRANT**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any firearm or ammunition involved in or used in the commission of said offenses, including but not limited to the following:

Glock, Model 22C .40 caliber handgun with Slide, bearing serial number [REDACTED] attached to a Glock grip, bearing serial number [REDACTED]

Ruger, Model Super Hawk revolver, bearing serial number [REDACTED]

Romarm, Mini DRACO, bearing serial number [REDACTED]

3. As a result of the offense alleged in Count 2, the defendant, **TOWNSEND GRANT** shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any property, constituting or derived from, any proceeds obtained, directly or indirectly, as the result of said offense, and any property, used or intended to be used, in any manner or part, to commit or to facilitate the commission of said offense.

4. 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

A handwritten signature in black ink, appearing to read "Michael E. Trummel", written over a horizontal line.

MICHAEL E. TRUMMEL
Assistant United States Attorney
Louisiana Bar Roll No. 36288

New Orleans, Louisiana
January 26, 2023