

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

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

UNITED STATES OF AMERICA

\*

CRIMINAL NO:

v.

\*

SECTION: ""

TYRONE BROWN  
WALTER BROWN  
ROLAND REYNARD

\*

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

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The Grand Jury charges that:

**COUNT 1**

Beginning on a date unknown and continuing until on or about May 10, 2008, in the Eastern District of Louisiana, the defendants, **TYRONE BROWN, WALTER BROWN, and ROLAND REYNARD**, did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons known and unknown to the Grand Jury, to possess with the intent to

distribute 50 grams or more of cocaine base ("crack"), a Schedule II narcotic drug controlled substance, and a quantity of heroin and marijuana, both Schedule I drug controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), 841(b)(1)(C) and 841(b)(1)(D); all in violation of Title 21, United States Code, Section 846.

#### COUNT 2

Beginning on a date unknown and continuing until on or about May 10, 2008, in the Eastern District of Louisiana, the defendants, **TYRONE BROWN, WALTER BROWN, and ROLAND REYNARD**, did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons known and unknown to the Grand Jury, during and in relation to a drug trafficking crime, to use and carry firearms, and possess firearms in furtherance of a drug trafficking crime, to wit: conspiracy to possess with the intent to distribute cocaine base, heroin, and marijuana; all in violation of Title 18, United States Code, Section 924(o).

#### COUNT 3

On or about May 10, 2008, in the Eastern District of Louisiana, the defendant, **TYRONE BROWN**, did knowingly and intentionally possess with the intent to distribute a quantity of cocaine base ("crack"), a Schedule II narcotic drug controlled substance, and a quantity of marijuana, a Schedule I drug controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and 841(b)(1)(D) and Title 18, United States Code, Section 2.

#### COUNT 4

On or about May 10, 2008, in the Eastern District of Louisiana, the defendant, **WALTER BROWN**, did knowingly and intentionally possess with the intent to distribute a quantity of cocaine base ("crack"), a Schedule II narcotic drug controlled substance, and a quantity of heroin, a Schedule

I drug controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and 841(b)(1)(D) and Title 18, United States Code, Section 2.

**COUNT 5**

On or about May 10, 2008, in the Eastern District of Louisiana, the defendant, **ROLAND REYNARD**, did knowingly and intentionally possess with the intent to distribute a quantity of cocaine base ("crack"), a Schedule II narcotic drug controlled substance, and a quantity of marijuana, a Schedule I drug controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and 841(b)(1)(D) and Title 18, United States Code, Section 2.

**COUNT 6**

On or about May 10, 2008, in the Eastern District of Louisiana, the defendant, **TYRONE BROWN**, did knowingly possess a firearm, to wit: a loaded Smith and Wesson .40 caliber semi-automatic handgun, serial number RAY6077, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, as charged in Counts 1 and 3 of this indictment, to wit: conspiracy to possess with the intent to distribute cocaine base, heroin and marijuana and possession with the intent to distribute cocaine base and marijuana, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 18, United States Code, Section 924(c)(1)(A) and Title 18, United States Code, Section 2.

**COUNT 7**

On or about May 10, 2008, in the Eastern District of Louisiana, the defendant, **WALTER BROWN**, did knowingly possess a firearm, to wit: a loaded Smith and Wesson .40 caliber semi-automatic handgun, serial number RBF1718, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, as charged in Counts 1 and 4 of this indictment,

to wit: conspiracy to possess with the intent to distribute cocaine base, heroin and marijuana and possession with the intent to distribute cocaine base and heroin, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 18, United States Code, Section 924(c)(1)(A) and Title 18, United States Code, Section 2.

#### COUNT 8

On or about May 10, 2008, in the Eastern District of Louisiana, the defendant, **ROLAND REYNARD**, did knowingly possess a firearm, to wit: a loaded .32 caliber six shot revolver, serial number 159C5, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, as charged in Counts 1 and 5 of this indictment, to wit: conspiracy to possess with the intent to distribute cocaine base, heroin and marijuana and possession with the intent to distribute cocaine base and marijuana, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 18, United States Code, Section 924(c)(1)(A) and Title 18, United States Code, Section 2.

#### COUNT 9

On or about May 10, 2008, in the Eastern District of Louisiana, the defendant, **TYRONE BROWN**, having previously been convicted of crimes punishable by imprisonment for a term exceeding one year, to wit: a conviction on October 3, 2007, in Orleans Parish Criminal District Court, Case No. 465-610 "G", for possession of crack cocaine, in violation of La. R.S. 40:967, and attempted possession of a firearm with narcotics, in violation of La. R.S. 14:(27) 95(E), and a conviction on October 3, 2007, in Orleans Parish Criminal District Court, Case No. 470-999 "G", for possession of crack cocaine, in violation of La. R.S. 40:967, did knowingly possess in and affecting interstate commerce, a firearm, to wit: a loaded Smith and Wesson .40 caliber semi-

automatic handgun, serial number RAY6077; all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

#### COUNT 10

On or about May 10, 2008, in the Eastern District of Louisiana, the defendant, **WALTER BROWN**, having previously been convicted of three crimes punishable by imprisonment for a term exceeding one year, to wit: a conviction on August 18, 2004, in Orleans Parish Criminal District Court, Case No. 448-604 "C", for possession of crack cocaine, in violation of La. R.S. 40:967, a conviction on December 15, 2004, in Orleans Parish Criminal District Court, Case No. 452-754 "F", for possession of cocaine, in violation of La. R.S. 40:967, and a conviction on October 2, 2007, in Orleans Parish Criminal District Court, Case No. 467-388 "A", for possession of cocaine, in violation of La. R.S. 40:967, did knowingly possess in and affecting interstate commerce, a firearm, to wit: a loaded Smith and Wesson .40 caliber semi-automatic handgun, serial number RBF1718; all 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, 3, 4, and 5 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, 3, 4, and 5 the defendants, **TYRONE BROWN, WALTER BROWN, and ROLAND REYNARD**, 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, 3, 4, and 5 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 defendants:

- 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 defendants 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 2, 6, 7, 8, 9, and 10 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, Section 924 (d)(1) and Title 28, United States Code, Section 2461(c).

2. As a result of the offenses alleged in Counts 2, 6, 7, 8, 9, and 10, the defendants, **TYRONE BROWN, WALTER BROWN, and ROLAND REYNARD**, 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, any firearm or ammunition, which was involved in or used in a knowing violation of Title 18, United States Code, Sections 924(c)(1)(A) and 922(g).

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;

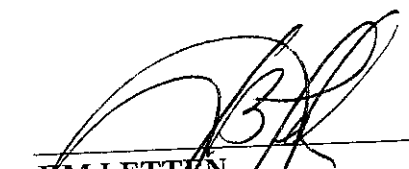
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

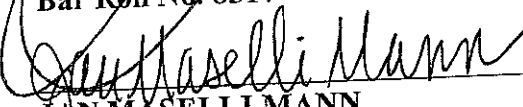
All in violation of Title 18, United States Code, Sections 922(g), 924(c)(1)(A) and

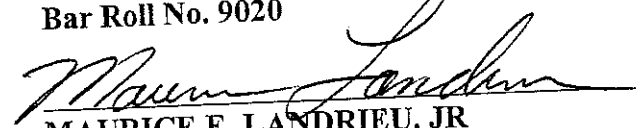
924(d)(1).

A TRUE BILL:

FOREPERSON

  
\_\_\_\_\_  
JIM LETTEN  
UNITED STATES ATTORNEY  
Bar Roll No. 8517

  
\_\_\_\_\_  
JAN MASELLI MANN  
Chief, Criminal Division  
Assistant United States Attorney  
Bar Roll No. 9020

  
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MAURICE E. LANDRIEU, JR  
Assistant United States Attorney  
Bar Roll No. 22104

New Orleans, Louisiana  
June 6, 2008