

UNITED STATES DISTRICT COURT **FILED IN OPEN COURT**
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

5-19-2022
CLERK, U. S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE, FLORIDA

UNITED STATES OF AMERICA

v.

CASE NO. 3:22-cr-55-MMH-JBT
18 U.S.C. § 371
26 U.S.C. § 5861 (d)-(e)
18 U.S.C. § 115(a)(1)(B)

DUSTIN ALLEN EWARD
GREGORY AUSTIN EWARD

INDICTMENT

The Grand Jury charges:

COUNT ONE

Beginning on an unknown date, but no later than in or about April 2017, and continuing through on or about May 9, 2022, in the Middle District of Florida, and elsewhere, the defendants,

DUSTIN ALLEN EWARD and
GREGORY AUSTIN EWARD,

did knowingly and willfully combine, conspire, confederate, and agree with each other and others, both known and unknown to the grand jury, to commit offenses against the United States, specifically, to possess and to transfer firearms, specifically, firearm silencers, as defined in 26 U.S.C. § 5845(a)(7) and 18 U.S.C. 921(a)(24), which firearms were not then registered in the National Firearms Registration and Transfer Record as required by 26 U.S.C. § 5841, in violation of 26 U.S.C. §§ 5861(d)-(e) and 5871.

Manner and Means

The manner and means by which the conspirators carried out the conspiracy included, among other things:

- a. It was part of the conspiracy that DUSTIN EWARD and GREGORY EWARD would and did operate the websites www.gunthreadadapters.com and www.ewardresearch.com, which were e-commerce portals on which DUSTIN EWARD and GREGORY EWARD advertised firearm silencers.
- b. It was further part of the conspiracy that DUSTIN EWARD and GREGORY EWARD would and did receive orders for firearm silencers.
- c. It was further part of the conspiracy that DUSTIN EWARD and GREGORY EWARD would and did manufacture and make parts for firearm silencers at their residence within the Middle District of Florida.
- d. It was further part of the conspiracy that DUSTIN EWARD and GREGORY EWARD would and did fulfill orders for firearm silencers by shipping those items via U.S. Mail from the Middle District of Florida, resulting in the transfer of firearm silencers to customers.
- e. It was further part of the conspiracy that DUSTIN EWARD would create videos posted to his YouTube, BitChute, and Odysee channel in which DUSTIN EWARD promoted the sale of silencers.

f. It was further part of the conspiracy that DUSTIN EWARD and GREGORY EWARD would recommend and receive payments via cryptocurrency for the purchase of firearm silencers advertised on www.ewardresearch.com.

g. It was further part of the conspiracy that the conspirators would and did engage in acts and make statements to promote and achieve the objects of the conspiracy and to hide and conceal the purposes of the conspiracy and the acts committed in furtherance thereof.

Overt Acts

In furtherance of the conspiracy and to effect the objects thereof, the conspirators committed the following overt acts, among others, in the Middle District of Florida and elsewhere:

- a. In or about April 2017, GREGORY EWARD became chief operating officer of Eward Research Inc., working alongside DUSTIN EWARD, who served as chief executive officer.
- b. On or about July 21, 2020, DUSTIN EWARD called the Tallahassee office of the Bureau of Alcohol, Tobacco, Firearms and Explosives, and expressed concern about the possible dissolution of Eward Research, Inc., and how that might affect the registration of firearms that had been registered in the name

of the business.

- c. On various dates, including on or about November 9, 2021, the conspirators maintained promotional information about firearm silencer “kits” on the business’s website, ewardresearch.com.
- d. On or about January 14, 2022, DUSTIN EWARD sent an email from dustin.e@ewardresearch.com to a putative customer. In the email, DUSTIN EWARD provided the purchase price for a silencer advertised on his website, www.ewardresearch.com, and the instructions on how to pay for the silencer using cryptocurrency.
- e. On or about January 28, 2022, DUSTIN EWARD sent an email from dustin.e@ewardresearch.com to a putative customer. In the email, DUSTIN EWARD confirmed that he had received an order for two silencers, that GREGORY EWARD had forgotten to pack several of the 3D printed items, which were sitting in the kitchen of their residence, and that the silencers would be sent out to the purchaser soon.
- f. On or about January 31, 2022, GREGORY EWARD fulfilled an order for two silencers by shipping and transferring the silencers from the Middle District of Florida to the purchaser via U.S.

Mail.

- g. On or about February 12, 2022, DUSTIN EWARD sent an email from dustin.e@ewardresearch.com to a putative customer regarding a purchase order for a silencer. In the email, DUSTIN EWARD discussed firearm specifications, the price of the silencer, and how to use cryptocurrency for payment.
- h. In or about February 2022, the conspirators fulfilled an order for a silencer by shipping and transferring the silencer from the Middle District of Florida to a purchaser via the U.S. Mail.
- i. On February 22, 2022, DUSTIN EWARD sent an email, from dustin.e@ewardresearch.com, to a putative customer, providing the United States Postal Service tracking number for a package containing a silencer.

All in violation of 18 U.S.C. § 371.

COUNT TWO

On or about January 31, 2022, in the Middle District of Florida, and elsewhere, the defendants,

DUSTIN ALLEN EWARD and
GREGORY AUSTIN EWARD,

did knowingly possess firearms, and aid and abet the possession of firearms, specifically, firearm silencers, as defined in 26 U.S.C. § 5845(a)(7) and 18 U.S.C. 921(a)(24), which firearms were not then registered in the National Firearms Registration and Transfer Record as required by 26 U.S.C. § 5841.

In violation of 26 U.S.C. §§ 5861(d) and 5871, and 18 U.S.C. § 2.

COUNT THREE

On or about January 31, 2022, in the Middle District of Florida, and elsewhere, the defendants,

DUSTIN ALLEN EWARD and
GREGORY AUSTIN EWARD,

did knowingly transfer firearms, and aid and abet the transfer of firearms, specifically, firearm silencers, as defined in 26 U.S.C. § 5845(a)(7) and 18 U.S.C. 921(a)(24), which firearms were not then registered in the National Firearms Registration and Transfer Record as required by 26 U.S.C. § 5841.

In violation of 26 U.S.C. §§ 5861(e) and 5871, and 18 U.S.C. § 2.

COUNT FOUR

On or about February 16, 2022, in the Middle District of Florida, and elsewhere, the defendants,

DUSTIN ALLEN EWARD and
GREGORY AUSTIN EWARD,

did knowingly possess a firearm, and aid and abet the possession of a firearm, specifically, a firearm silencer, as defined in 26 U.S.C. § 5845(a)(7) and 18 U.S.C. 921(a)(24), which firearm was not then registered in the National Firearms Registration and Transfer Record as required by 26 U.S.C. § 5841.

In violation of 26 U.S.C. §§ 5861(d) and 5871, and 18 U.S.C. § 2.

COUNT FIVE

On or about February 16, 2022, in the Middle District of Florida, and elsewhere, the defendants,

DUSTIN ALLEN EWARD and
GREGORY AUSTIN EWARD,

did knowingly transfer a firearm, and aid and abet the transfer of a firearm, specifically, a firearm silencer, as defined in 26 U.S.C. § 5845(a)(7) and 18 U.S.C. 921(a)(24), which firearm was not then registered in the National Firearms Registration and Transfer Record as required by 26 U.S.C. § 5841.

In violation of 26 U.S.C. §§ 5861(e) and 5871, and 18 U.S.C. § 2.

COUNT SIX

On or about April 15, 2022, in the Middle District of Florida, and elsewhere, the defendant,

DUSTIN ALLEN EWARD,

did threaten to assault and murder a federal law enforcement officer with the intent to impede, intimidate, and interfere with such law enforcement officer while engaged in the performance of official duties, and with the intent to retaliate against such law enforcement officer on account of the performance of official duties.

In violation of 18 U.S.C. § 115(a)(1)(B).

FORFEITURE

1. The allegations contained in Count One through Five are incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 924(d), 26 U.S.C. § 5872, 18 U.S.C. § 981(a)(1)(C), 26 U.S.C. § 7302 and 28 U.S.C. § 2461(c).

2. Upon conviction for a violation of 26 U.S.C. § 5861(d)-(e), or a conviction for conspiring to violate those statutes in violation of 18 U.S.C. § 371, the defendants, DUSTIN EWARD and GREGORY EWARD, shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d), 26 U.S.C. § 5872, and 28 U.S.C. § 2461(c), any firearms and ammunition involved in the commission of the offense, and, pursuant to 26 U.S.C. § 7302, any property intended for use or that has been

used in committing the violation.

3. If any of the property described above, 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 party;
- 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 divided without difficulty;

the United States shall be entitled to forfeiture of substitute property under the provisions of 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

A TRUE BILL,



Foreperson


ROGER B. HANDBERG
United States Attorney

By: 

Kirwinn Mike
Assistant United States Attorney

By: 

Michael Coolican
Assistant United States Attorney

By: 

Cherie L. Krigsman
Assistant United States Attorney
Chief, National Security and Cybercrime Section

No.

UNITED STATES DISTRICT COURT
Middle District of Florida
Jacksonville Division

THE UNITED STATES OF AMERICA

vs.

DUSTIN ALLEN EWARD
GREGORY AUSTIN EWARD

INDICTMENT

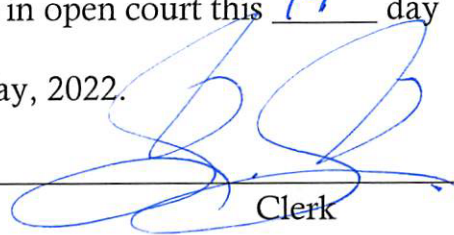
Violations: 18 U.S.C. § 371, 26 U.S.C. § 5861 (d)-(e), and 18 U.S.C. § 115(a)(1)(B)

A true bill,



Foreperson

Filed in open court this 19th day
of May, 2022.



Clerk

Bail \$ _____
