

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA

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JUN 26 2012

UNITED STATES OF AMERICA)
)
v.)
)
CARL MONROE,)
RICHARD MONROE,)
KEVIN DAWSON, and)
JACK WARDLAW)

1:12-cr-65
Judge Collier
Judge Carter

INDICTMENT
COUNT ONE
[Conspiracy to Sell Firearms without a License]
18 U.S.C. § 371

THE GRAND JURY CHARGES THAT:

A. The Conspiracy and its Purpose:

From approximately in or about March 2008, and continuing until approximately on or about May 23, 2012, in the Eastern District of Tennessee and elsewhere, defendants CARL MONROE, RICHARD MONROE, KEVIN DAWSON, JACK WARDLAW, and others known and unknown to the grand jury, did willfully, knowingly, and intentionally combine, conspire, confederate and agree together and with each other to commit offenses against the United States, that is: they conspired to sell firearms without obtaining a federal firearms license, in violation of Title 18, United States Code, Section 922(a)(1).

B. The Federal Firearms License requirement:

Title 18, United States Code, Section 922(a)(1)(A) provides that it is unlawful for any person to engage in the business of dealing in firearms, or in the course of such business to ship, transport, or receive any firearm in interstate commerce without a license. Sections 921(a)(21)(C) and 921(a)(22) state that “engaged in the business” means a person devotes time,

attention, and labor to dealing in firearms as a regular course of trade or business with the principal objective of livelihood or profit through the repetitive purchase and resale of firearms, such that the intent behind the sale of firearms is predominantly one of obtaining livelihood or pecuniary gain, as opposed to other intents, such as improving or liquidating a personal firearms collection or making occasional sales, exchanges, or purchases. The "business" need not be an individual's primary business, nor must he successfully obtain profits from it; rather, he must demonstrate a willingness to deal, a profit motive, and a greater degree of activity than occasional sales by a hobbyist. Proof of profit is also not required as to individuals who engage in firearms transactions for criminal purposes.

Persons who lawfully deal firearms are required to obtain a Federal Firearms License which is issued by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). Those licensees (hereafter referred to as "FFLs") are required to maintain records, whether written or electronic, of each and every firearm received, stored, and sold or traded. That record, referred to as the "bound book," is required to be retained by the FFL as long as he or she is in business. FFLs are required to forward the bound book and all firearms transaction records to the ATF if they subsequently go out of business. Those records are then maintained by the ATF. FFLs are subject to inspection by designated agents of the ATF. FFLs operating in the state of Tennessee are required to complete an ATF Form Number 4473 for each firearm transaction and submit the name, social security number and date of birth of each buyer in each transaction to the Tennessee Bureau of Investigation. ATF Form Number 4473, among other things, is utilized to determine if the buyer purchased a firearm lawfully. Individuals who engage in the business of selling firearms without a license are in violation of Title 18, United States Code, Section 922(a)(1)(A).

C. Objects of the Conspiracy:

The objects of the conspiracy were to realize a profit from a regular course of dealing in firearms without obtaining a license and thus also avoid governmental oversight, tax consequences, and the necessity for making background checks before selling firearms.

D. Manner and Means of the Conspiracy:

1. It was a part of this conspiracy that the defendants purchased or traded for firearms, ammunition, and other items associated with firearms such as holsters, gun stocks, and firearm parts, from gun shows in order to obtain these items without a record of the transaction.
2. It was further a part of this conspiracy that the defendants purchased or traded for multiple firearms in a single transaction, rather than buying each firearm individually.
3. It was further a part of this conspiracy that the defendants sold or traded firearms, ammunition, and other items associated with firearms, such as holsters, gun stocks, and firearm parts at gun shows where there would be no record of the transaction.
4. It was further a part of this conspiracy that the defendants advertised their business of selling firearms in publications and with business cards and by way of mouth.
5. It was further a part of this conspiracy that the defendants would look for certain firearms, ammunition, and other items associated with firearms such as holsters, gun stocks, and firearm parts, that were either specifically

requested by potential buyers, or were known to be desired by potential buyers.

6. It was further a part of this conspiracy that the defendants would contact each other as well as other individuals in the business of selling firearms to locate certain firearms, ammunition, and other items associated with firearms such as holsters, gun stocks, and firearm parts, for potential buyers.

E. Overt Acts:

In order to further and accomplish the objects of the conspiracy, the following overt acts, among others, were committed by defendants CARL MONROE, RICHARD MONROE, KEVIN DAWSON, JACK WARDLAW, and others known and unknown to the grand jury, in the Eastern District of Tennessee and elsewhere.

1. In or about January 2009, JACK WARDLAW invested at least \$15,000 in a firearm trafficking business with KEVIN DAWSON.

2. On or about April 18, 2009, KEVIN DAWSON purchased multiple firearms from Earl Austin Crow III, an FFL.

3. On or about March 10, 2010, JACK WARDLAW purchased multiple firearms from Yogey's Bunker, an FFL.

4. On or about September 10, 2010, KEVIN DAWSON purchased multiple firearms from Globo Loan, an FFL.

5. On or about January 20, 2011, RICHARD MONROE purchased multiple firearms from AAAA Pawn Shop and Trading Post, an FFL.

6. On or about February 17, 2011, CARL MONROE purchased multiple firearms from AAAA Pawn Shop and Trading Post, an FFL.

7. On or about June 9, 2011, CARL MONROE sold a firearm to an individual who is prohibited from possessing any firearm due to a prior felony conviction.

8. In or about March 2011, KEVIN DAWSON traded a firearm to an individual who is prohibited from possessing any firearm due to a prior felony conviction.

9. On or about March 27, 2012, JACK WARDLAW sold a firearm to an individual.

10. On or about April 6, 2012, CARL MONROE and RICHARD MONROE sold a firearm to an individual.

11. On or about April 11, 2012, CARL MONROE and RICHARD MONROE discussed the sale of an AR rifle with an individual. RICHARD MONROE then contacted KEVIN DAWSON about selling an AR rifle to that individual.

12. Between January and May, 2012, KEVIN DAWSON sold 26 firearms to two individuals.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO
[Dealing in firearms without a license]
18 U.S.C. § 922(a)

The Grand Jury further charges that on or about January 21, 2011, in the Eastern District of Tennessee, the defendant, CARL MONROE, not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A).

COUNT THREE
[Selling a Firearm to a Prohibited Person]
18 U.S.C. § 922(d)

The Grand Jury further charges that on or about February 16, 2011, in the Eastern District of Tennessee, the defendant, CARL MONROE, knowingly sold a firearm and ammunition to an individual, knowing and having reasonable cause to believe that this person had been convicted of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Sections 922(d).

COUNT FOUR
[Selling a Firearm to a Prohibited Person]
18 U.S.C. § 922(d)

The Grand Jury further charges that on or about March 4, 2011, in the Eastern District of Tennessee, the defendant, CARL MONROE, knowingly sold a firearm and ammunition to an individual, knowing and having reasonable cause to believe that this person had been convicted of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Sections 922(d).

COUNT FIVE
[Dealing in firearms without a license]
18 U.S.C. § 922(a)

The Grand Jury further charges that on or about March 4, 2011, in the Eastern District of Tennessee, the defendant, CARL MONROE, not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A).

COUNT SIX
[Selling a Firearm to a Prohibited Person]
18 U.S.C. § 922(d)

The Grand Jury further charges that on or about June 9, 2011, in the Eastern District of Tennessee, the defendant, CARL MONROE, knowingly sold a firearm and ammunition to an individual, knowing and having reasonable cause to believe that this person had been convicted of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Sections 922(d).

COUNT SEVEN
[Dealing in firearms without a license]
18 U.S.C. § 922(a)

The Grand Jury further charges that on or about February 16, 2012, in the Eastern District of Tennessee, the defendant, KEVIN DAWSON, not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A).

COUNT EIGHT
[Dealing in firearms without a license]
18 U.S.C. § 922(a)

The Grand Jury further charges that on or about February 22, 2012, in the Eastern District of Tennessee, the defendant, KEVIN DAWSON, not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A).

COUNT NINE
[Dealing in firearms without a license]
18 U.S.C. § 922(a)

The Grand Jury further charges that on or about March 8, 2012, in the Eastern District of Tennessee, the defendant, KEVIN DAWSON, not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A).

COUNT TEN
[Dealing in firearms without a license]
18 U.S.C. § 922(a)

The Grand Jury further charges that on or about March 28, 2012, in the Eastern District of Tennessee, the defendant, KEVIN DAWSON, not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A).

COUNT ELEVEN
[Dealing in firearms without a license]
18 U.S.C. § 922(a)

The Grand Jury further charges that on or about April 6, 2012, in the Eastern District of Tennessee, the defendants, CARL MONROE and RICHARD MONROE, aided and abetted by each other, not being licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT TWELVE
[Dealing in firearms without a license]
18 U.S.C. § 922(a)

The Grand Jury further charges that on or about April 11, 2012, in the Eastern District of Tennessee, the defendants, CARL MONROE, RICHARD MONROE, and KEVIN DAWSON, aided and abetted by each other, not being licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT THIRTEEN
[Dealing in firearms without a license]
18 U.S.C. § 922(a)

The Grand Jury further charges that on or about May 16, 2012, in the Eastern District of Tennessee, the defendant, RICHARD MONROE, not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A).

COUNT FOURTEEN
[Possession of a Machine Gun]
18 U.S.C. § 922(o)

The Grand Jury further charges that on or about May 23, 2012, in the Eastern District of Tennessee, the defendant, KEVIN DAWSON, did knowingly possess a machinegun, in violation of Title 18, United States Code, Sections 922(o).

FORFEITURE ALLEGATIONS

The allegations contained in Counts One through Fourteen of this Indictment are hereby re-alleged and incorporated by reference for the purposes of alleging forfeitures herein, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), which require the forfeiture of any firearm and ammunition involved in or used in any willful violation of Title 18, United States Code, Section 922, or any violation of any criminal law of the United States.

Upon conviction of any of the offenses in violation of Title 18, United States Code, Sections 922(a)(1), as set forth in Counts One through Fourteen of this Indictment, the defendants, CARL MONROE, RICHARD MONROE, KEVIN DAWSON and JACK WARDLAW, shall forfeit to the United States pursuant to Title 18, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of the offense, including but not limited to:

1. COLT PISTOL, CAL: 22
2. COLT REVOLVER, MODEL: FRONTIER SCOUT, CAL: 22,
3. COLT, TYPE: REVOLVER, MODEL: FRONTIER SCOUT, CAL: 22,
4. HIGH STANDARD, PISTOL, MODEL: SUPERMATIC TOURNAMNT, CAL: 22,
5. HIGH STANDARD, PISTOL, MODEL: VICTOR, CAL: 22
6. HIGH STANDARD, TYPE: REVOLVER, MODEL: LONGHORN, CAL: 22
7. INTERARMS, TYPE: PISTOL, MODEL: Walther, CAL: 380,
8. NORTH AMERICAN ARMS, TYPE: REVOLVER, MODEL: NAA22, CAL: 22,
9. NORTH AMERICAN ARMS, TYPE: REVOLVER, MODEL: NAA22, CAL: 22,
10. RG INDUSTRIES, TYPE: REVOLVER, MODEL: RG14, CAL: 22,
11. RUGER, TYPE: PISTOL, MODEL: MARK II TARGET, CAL: 22,
12. RUGER, TYPE: REVOLVER, MODEL: NEW MODEL SINGLE SIX, CAL: 22,
13. RUGER, TYPE: REVOLVER, MODEL: SECURITY SIX, CAL: 357,
14. RUGER, TYPE: REVOLVER, MODEL: SINGLE SIX, CAL: 22,
15. RUGER, TYPE: REVOLVER, MODEL: SUPER REDHAWK, CAL: 44
16. SIG SAUER (SIG-ARMS), TYPE: PISTOL, MODEL: P238, CAL: 380
17. SMITH & WESSON, TYPE: PISTOL, MODEL: M&P 9, CAL: 9,

18. SMITH & WESSON, TYPE: REVOLVER, CAL: 38,
19. SMITH & WESSON, TYPE: REVOLVER, MODEL: 317 AIRLITE, CAL: 22,
20. SMITH & WESSON, TYPE: REVOLVER, MODEL: 36, CAL: 38,
21. SMITH & WESSON, TYPE: REVOLVER, MODEL: HAND EJECTOR, CAL: 32,,
22. SMITH & WESSON, TYPE: REVOLVER, MODEL: M&P, CAL: 38,
23. TAURUS, TYPE: PISTOL, MODEL: PT92AFS, CAL: 9,
24. THOMPSON/CENTER ARMS CO., TYPE: PISTOL, MODEL: CONTENDER, CAL: 22,
25. UNKNOWN MANUFACTURER, TYPE: PISTOL, MODEL: UNKNOWN, CAL: 9,
26. WALTHER, TYPE: PISTOL, MODEL: P1, CAL: 9,
27. WINCHESTER, TYPE: PISTOL, MODEL: unknown, CAL: 22,:
28. BUSHMASTER FIREARMS, TYPE: RIFLE, MODEL: XM15-E2S, CAL: 223,
29. COLT, TYPE: RIFLE, MODEL: M16, CAL: 22,
30. DPMS (DEFENSE PROCUREMENT MFG. SVS), RIFLE, MODEL: LR-308, CAL: 308,
31. FABRICA DE ARMAS S.E.A.M., TYPE: RIFLE, MODEL: Einfield, CAL: 7.62,,
32. IVER JOHNSON, TYPE: RIFLE, MODEL: US CARBINE, CAL: 22,
33. MARLIN FIREARMS CO., TYPE: RIFLE, MODEL: 336W, CAL: 30-30,
34. MARLIN FIREARMS CO., TYPE: RIFLE, MODEL: 39A, CAL: 22,
35. MARLIN FIREARMS CO., TYPE: RIFLE, MODEL: 39D, CAL: 22,
36. MOSSBERG, TYPE: RIFLE, MODEL: 464, CAL: 30-30,:
37. NEW ENGLAND FIREARMS, TYPE: SHOTGUN, MODEL: PARDNER, CAL: 12,
38. ROSSI, TYPE: RIFLE, MODEL: 92, CAL: 45,
39. ROSSI, TYPE: RIFLE, MODEL: M59, CAL: 22,
40. ROSSI, TYPE: RIFLE, MODEL: M59, CAL: 22,
41. ROSSI, TYPE: RIFLE, MODEL: M92, CAL: 38,
42. RUGER, TYPE: RIFLE, MODEL: Ranch, CAL: 223,
43. SAVAGE, TYPE: RIFLE, MODEL: 99, CAL: 300,
44. THOMPSON/CENTER ARMS CO., TYPE: RIFLE, MODEL: ENCORE, CAL: 223,
45. UNKNOWN MANUFACTURER, TYPE: RIFLE, MODEL: 93M-491A, CAL: 22,
46. UNKNOWN MANUFACTURER, TYPE: RIFLE, MODEL: M1, CAL: 30,
47. UNKNOWN MANUFACTURER, TYPE: RIFLE, MODEL: Unknown, CAL: 25-06,
48. UNKNOWN MANUFACTURER, TYPE: SHOTGUN, MODEL: double barrel , CAL: 12,
49. WEATHERBY, TYPE: RIFLE, MODEL: MARK XXII, CAL: 22,
50. WINCHESTER, TYPE: RIFLE, MODEL: 62, CAL: 22,
51. WINCHESTER, TYPE: RIFLE, MODEL: 70, CAL: 22-250,:
52. WINCHESTER, TYPE: RIFLE, MODEL: 70, CAL: 270,
53. WINCHESTER, TYPE: RIFLE, MODEL: 94, CAL: 30-30,
54. WINCHESTER, TYPE: RIFLE, MODEL: 94, CAL: 30-30,
55. WINCHESTER, TYPE: RIFLE, MODEL: 94, CAL: 30-30,
56. WINCHESTER, TYPE: RIFLE, MODEL: 94, CAL: 32,
57. WINCHESTER, TYPE: RIFLE, MODEL: 94AE, CAL: 44,
58. WINCHESTER, TYPE: RIFLE, MODEL: RANGER, CAL: 30-30,
59. SAVAGE, TYPE: COMBINATION GUN, MODEL: 24DL, CAL: 22/20,
60. SMITH & WESSON, TYPE: SHOTGUN, MODEL: 1000, CAL: 12,

61. SMITH & WESSON, TYPE: SHOTGUN, MODEL: 1000, CAL: 20,
62. BERETTA USA CORP, TYPE: PISTOL, MODEL: 21A, CAL: 22,
63. GLOCK GMBH, TYPE: PISTOL, MODEL: 19, CAL: 9,
64. GLOCK GMBH, TYPE: PISTOL, MODEL: 26, CAL: 9,
65. KELTEC, CNC INDUSTRIES, INC., TYPE: PISTOL, MODEL: P3AT, CAL: 380,
66. SMITH & WESSON, TYPE: REVOLVER, MODEL: 342PD AIRLITE, CAL: 38,
67. SMITH & WESSON, TYPE: REVOLVER, MODEL: 37 AIRWEIGHT, CAL: 38,
68. RUGER, TYPE: RIFLE, MODEL: 77/17, CAL: 17,
69. CHARTER ARMS, TYPE: REVOLVER, MODEL: UNDERCOVER, CAL: 38,
70. COLT, TYPE: PISTOL, CAL: 22,
71. COLT, TYPE: PISTOL, MODEL: 1911, CAL: 45,
72. COLT, TYPE: PISTOL, MODEL: ACE, CAL: 22,
73. COLT, TYPE: REVOLVER, CAL: 357,
74. COLT, TYPE: REVOLVER, CAL: 45,
75. COLT, TYPE: REVOLVER, MODEL: DETECTIVE SPECIAL, CAL: 38,
76. COLT, TYPE: REVOLVER, MODEL: PEACEMAKER, CAL: 22,
77. COLT, TYPE: REVOLVER, MODEL: PYTHON, CAL: 357,
78. EXCAM, TYPE: PISTOL, MODEL: RX22, CAL: 22,
79. GLOCK GMBH, TYPE: PISTOL, MODEL: 19, CAL: 9,
80. GLOCK GMBH, TYPE: PISTOL, MODEL: 26, CAL: 9,
81. GLOCK GMBH, TYPE: PISTOL, MODEL: 33, CAL: 357,
82. HECKLER & KOCH INC., TYPE: PISTOL, MODEL: USP45 COMPACT, CAL: 45,
83. HIGH STANDARD, TYPE: DERRINGER, MODEL: DM101, CAL: 22,
84. HIGH STANDARD, TYPE: DERRINGER, MODEL: DM101, CAL: 22,
85. HIGH STANDARD, TYPE: PISTOL, MODEL: SHARPSHOOTER, CAL: 22,
86. HIGH STANDARD, TYPE: PISTOL, MODEL: SHARPSHOOTER, CAL: 22,
87. HIGH STANDARD, TYPE: PISTOL, MODEL: SUPERMATIC CITATION, CAL: 22,
88. HIGH STANDARD, TYPE: PISTOL, MODEL: SUPERMATIC CITATION, CAL: 22,
89. HOPKINS AND ALLEN, TYPE: REVOLVER, MODEL: SAFETY POLICE, CAL: 38,
90. KIMBER, TYPE: PISTOL, MODEL: ULTRA RCP II, CAL: 45,
91. NORTH AMERICAN ARMS, TYPE: REVOLVER, CAL: 22,
92. NORTH AMERICAN ARMS, TYPE: REVOLVER, BLACK WIDOW, CAL: 22,
93. REMINGTON ARMS COMPANY, INC., TYPE: DERRINGER, CAL: 41,
94. RUGER, TYPE: PISTOL, MODEL: , CAL: 22,
95. RUGER, TYPE: PISTOL, MODEL: LCP, CAL: 380,
96. RUGER, TYPE: PISTOL, MODEL: LCP, CAL: 380,
97. RUGER, TYPE: REVOLVER, MODEL: SINGLE SIX, CAL: 22,
98. RUGER, TYPE: REVOLVER, MODEL: SINGLE SIX, CAL: 22,
99. RUGER, TYPE: REVOLVER, MODEL: SINGLE SIX, CAL: 22,
100. SIG SAUER (SIG-ARMS), TYPE: PISTOL, MODEL: p22, CAL: 22,
101. SIG-SAUER, TYPE: PISTOL, MODEL: P228, CAL: 9,
102. SMITH & WESSON, TYPE: REVOLVER, CAL: 357,
103. SMITH & WESSON, TYPE: REVOLVER, CAL: 38,
104. SMITH & WESSON, TYPE: REVOLVER, MODEL: 14, CAL: 38,
105. SMITH & WESSON, TYPE: REVOLVER, MODEL: 17, CAL: 22,

106. SMITH & WESSON, TYPE: REVOLVER, MODEL: 19, CAL: 357,
107. SMITH & WESSON, TYPE: REVOLVER, MODEL: 34, CAL: 22,
108. SMITH & WESSON, TYPE: REVOLVER, MODEL: 36, CAL: 38,
109. SMITH & WESSON, TYPE: REVOLVER, MODEL: 48, CAL: 22,
110. SMITH & WESSON, TYPE: REVOLVER, MODEL: 617, CAL: 22,
111. TAURUS INTERNATIONAL, TYPE: PISTOL, MODEL: pt22, CAL: 22,
112. THOMPSON/CENTER ARMS CO., TYPE: PISTOL, MODEL: ENCORE, CAL: 223,
113. UNKNOWN MANUFACTURER, TYPE: PISTOL, CAL: 22,
114. UNKNOWN MANUFACTURER, TYPE: PISTOL, MODEL: Marvel 1911, CAL: 22,
115. WALTHER, TYPE: PISTOL, MODEL: P22, CAL: 22,
116. WALTHER, TYPE: PISTOL, MODEL: P22, CAL: 22,
117. WALTHER, TYPE: PISTOL, MODEL: PPK, CAL: ZZ,
118. UNKNOWN MANUFACTURER, TYPE: PISTOL, MODEL: Merwin & Bray, CAL: 22,
119. UNKNOWN MANUFACTURER, TYPE: UNKNOWN TYPE, CAL: 22,
120. BENELLI, S. PA., TYPE: SHOTGUN, MODEL: 121M1, CAL: 12,
121. COLT, TYPE: RIFLE, MODEL: AR-15A2 GOV CARBINE, CAL: 223,
122. CZ (CESKA ZBROJOVKA), TYPE: RIFLE, MODEL: MARK X, CAL: .270,
123. CZ USA, TYPE: RIFLE, MODEL: MODEL 3, CAL: 204,
124. FABARM S.P.A., TYPE: SHOTGUN, MODEL: FP6, CAL: 12,
125. HARRINGTON AND RICHARDSON, TYPE: SHOTGUN, MODEL: 121, CAL: 20,
126. ITHACA GUN CO., TYPE: SHOTGUN, MODEL: 37 FEATHERLIGHT, CAL:12,
127. KEYSTONE SPORTING ARMS, TYPE: RIFLE, MODEL: CRICKET, CAL: 22,
128. KIMBER, TYPE: RIFLE, MODEL: 22, CAL: 22,
129. KIMBER, TYPE: RIFLE, MODEL: 82 GOVERNMENT, CAL: 22,
130. MARLIN FIREARMS CO., TYPE: RIFLE, MODEL: 1894, CAL: 357,
131. MARLIN FIREARMS CO., TYPE: RIFLE, MODEL: 1894, CAL: 44,
132. MARLIN FIREARMS CO., TYPE: RIFLE, MODEL: 1895G, CAL: 45-70,
133. MARLIN FIREARMS CO., TYPE: RIFLE, MODEL: 39A, CAL: 22,
134. MARLIN FIREARMS CO., TYPE: RIFLE, MODEL: 60W, CAL: 22,
135. MARLIN FIREARMS CO., TYPE: RIFLE, MODEL: 81, CAL: 22,
136. MARLIN FIREARMS CO., TYPE: RIFLE, MODEL: 94AE, CAL: 357,
137. MOSIN-NAGANT, TYPE: RIFLE, MODEL: Unknown, CAL: 7.62,
138. NORINCO (NORTH CHINA INDUSTRIES), TYPE: RIFLE, MODEL: AKS, CAL: 762,
139. REMINGTON ARMS COMPANY, INC., TYPE: RIFLE, MODEL: 510, CAL: 22,
140. REMINGTON ARMS COMPANY, INC., TYPE: RIFLE, MODEL: 550-1, CAL: 22,
141. REMINGTON ARMS COMPANY, INC., TYPE: RIFLE, MODEL: 700, CAL: 223,
142. REMINGTON ARMS COMPANY, INC., TYPE: RIFLE, MODEL: 700, CAL: 243,
143. REMINGTON ARMS COMPANY, INC., TYPE: RIFLE, MODEL: 700, CAL: 308,
144. RUGER, TYPE: RIFLE, MODEL: 10/22, CAL: 22,
145. RUGER, TYPE: RIFLE, MODEL: 10/22, CAL: 22,
146. RUGER, TYPE: RIFLE, MODEL: 10/22, CAL: 22,
147. RUGER, TYPE: RIFLE, MODEL: 10/22, CAL: 22,
148. RUGER, TYPE: RIFLE, MODEL: 10/22, CAL: 22,
149. RUGER, TYPE: RIFLE, MODEL: 77/22, CAL: 22,
150. RUGER, TYPE: RIFLE, MODEL: 77/22, CAL: 22,

151. SAVAGE, TYPE: RIFLE, CAL: 22,
152. SAVAGE, TYPE: RIFLE, MODEL: 99E, CAL: 300,
153. SAVAGE, TYPE: RIFLE, MODEL: MARK 12, CAL: .22,
154. SPRINGFIELD ARMORY,GENESE,IL, TYPE: RIFLE, MODEL: M1A, CAL: 308,
155. THOMPSON/CENTER ARMS CO., TYPE: RIFLE, CAL: 22,
156. THOMPSON/CENTER ARMS CO., TYPE: RIFLE, MODEL: CONTENDER, CAL: 223,
157. UNKNOWN MANUFACTURER, TYPE: RIFLE, CAL: 22,
158. UNKNOWN MANUFACTURER, TYPE: RIFLE, MODEL: M1 Carbine, CAL: 30,
159. UNKNOWN MANUFACTURER, TYPE: RIFLE, MODEL: M1, CAL: 30,
160. UNKNOWN MANUFACTURER, TYPE: RIFLE, MODEL: US Carbine, CAL: 30,
161. WINCHESTER, TYPE: RIFLE, MODEL: 67, CAL: 22,
162. WINCHESTER, TYPE: RIFLE, MODEL: 94, CAL: 45,
163. WINCHESTER, TYPE: RIFLE, MODEL: 9422, CAL: 22,
164. WINCHESTER, TYPE: SHOTGUN, MODEL: SUPER X3 (SX3), CAL: 12,
165. A.H. FOX GUN CO.-STERLINGWORTH, TYPE: SHOTGUN, CAL: 12,
166. BROWNING, TYPE: RIFLE, MODEL: unknown, CAL: 22,
167. HUGLU COOPERATIVE, TYPE: SHOTGUN, MODEL: Double Barrel, CAL: 12,
168. ITHACA GUN CO., TYPE: SHOTGUN, MODEL: 37 FEATHERLIGHT, CAL: 12,
169. MOSSBERG, TYPE: SHOTGUN, MODEL: 500, CAL: 12,
170. MOSSBERG, TYPE: SHOTGUN, MODEL: 590A1, CAL: 12,
171. REMINGTON ARMS COMPANY, INC., TYPE: SHOTGUN, MODEL: 10-A, CAL: 12,
172. SAVAGE, TYPE: SHOTGUN, MODEL: 24V Series D, CAL: 20/357,
173. SAVAGE, TYPE: SHOTGUN, MODEL: STEVENS 124, CAL: 12,
174. SWD, TYPE: SHOTGUN, MODEL: TERMINATOR, CAL: 12,
175. UNKNOWN MANUFACTURER, TYPE: SHOTGUN, CAL: 410,
176. BERETTA USA CORP, TYPE: PISTOL, MODEL: M9, CAL: 9,
177. BRYCO ARMS, TYPE: PISTOL, JENNINGS NINE, CAL: 9,
178. COLT, TYPE: PISTOL, MODEL: 1911, CAL: 45,
- 179 COLT, TYPE: PISTOL, MODEL: 1991A1, CAL: 45,
180. COLT, TYPE: PISTOL, MODEL: CHALLENGER, CAL: 22,
181. COLT, TYPE: PISTOL, MODEL: COMBAT COMMANDER, CAL: 45,
182. COLT, TYPE: PISTOL, MODEL: COMMANDER, CAL: 45,
183. COLT, TYPE: PISTOL, MODEL: GOVERNMENT, CAL: 38,
184. COLT, TYPE: PISTOL, MODEL: HUNTSMAN, CAL: 22,
185. COLT, TYPE: PISTOL, MODEL: MKIV, CAL: 38, BAR: 4, CAP: 6,
185. COLT, TYPE: PISTOL, MODEL: MKIV, CAL: 38,
186. COLT, TYPE: REVOLVER, CAL: 44-40,
187. COLT, TYPE: REVOLVER, MODEL: 1892 NEW ARMY & NAVY, CAL: 38,
188. COLT, TYPE: REVOLVER, MODEL: ARMY, CAL: 357,
189. COLT, TYPE: REVOLVER, MODEL: COMMANDO, CAL: 38
190. COLT, TYPE: REVOLVER, MODEL: DIAMONDBACK, CAL: 22,
191. COLT, TYPE: REVOLVER, MODEL: DIAMONDBACK, CAL: 22,
192. COLT, TYPE: REVOLVER, MODEL: DIAMONDBACK, CAL: 38,
193. COLT, TYPE: REVOLVER, MODEL: DIAMONDBACK, CAL: 38,
194. COLT, TYPE: REVOLVER, MODEL: FRONTIER SCOUT, CAL: 22,

195. COLT, TYPE: REVOLVER, MODEL: KING COBRA, CAL: 357,
196. COLT, TYPE: REVOLVER, MODEL: KING COBRA, CAL: 357,
197. COLT, TYPE: REVOLVER, MODEL: KING COBRA, CAL: 357,
198. COLT, TYPE: REVOLVER, MODEL: KING COBRA, CAL: 357,
199. COLT, TYPE: REVOLVER, MODEL: N/A, CAL: 357,
200. COLT, TYPE: REVOLVER, MODEL: NEW FRONTIER, CAL: 44,
201. COLT, TYPE: REVOLVER, MODEL: PYTHON ELITE, CAL: 357,
202. COLT, TYPE: REVOLVER, MODEL: PYTHON, CAL: 357,
203. COLT, TYPE: REVOLVER, MODEL: PYTHON, CAL: 357,
204. COLT, TYPE: REVOLVER, MODEL: PYTHON, CAL: 357,
205. COLT, TYPE: REVOLVER, MODEL: PYTHON, CAL: 357,
206. COLT, TYPE: REVOLVER, MODEL: PYTHON, CAL: 357,
207. COLT, TYPE: REVOLVER, MODEL: PYTHON, CAL: 357,
208. COLT, TYPE: REVOLVER, MODEL: PYTHON, CAL: 357,
209. COLT, TYPE: REVOLVER, MODEL: PYTHON, CAL: 357,
210. COLT, TYPE: REVOLVER, MODEL: PYTHON, CAL: 357,
211. COLT, TYPE: REVOLVER, MODEL: PYTHON, CAL: 357,
212. COLT, TYPE: REVOLVER, MODEL: PYTHON, CAL: 357,
213. COLT, TYPE: REVOLVER, MODEL: PYTHON, CAL: 357,
214. COLT, TYPE: REVOLVER, MODEL: PYTHON, CAL: 357,
215. COLT, TYPE: REVOLVER, MODEL: PYTHON, CAL: 357,
216. COLT, TYPE: REVOLVER, MODEL: PYTHON, CAL: 357,
217. COLT, TYPE: REVOLVER, MODEL: PYTHON, CAL: 357,
218. COLT, TYPE: REVOLVER, MODEL: TROOPER MKIII, CAL: 357,
219. COLT, TYPE: REVOLVER, MODEL: TROOPER MKIII, CAL: 357,
220. COLT, TYPE: REVOLVER, MODEL: VIPER, CAL: 38,
221. COLT, TYPE: REVOLVER, MODEL: VIPER, CAL: 38,
222. GLOCK GMBH, TYPE: PISTOL, MODEL: 17, CAL: 9,
223. GLOCK INC., TYPE: PISTOL, MODEL: 23, CAL: 40,
224. KAHR ARMS - AUTO ORDNANCE, TYPE: PISTOL, MODEL: CW40, CAL: 40,
225. KAHR ARMS - AUTO ORDNANCE, TYPE: PISTOL, MODEL: P40, CAL: 40,
226. MAKAROV, TYPE: PISTOL, MODEL: , CAL: 9,
227. RUGER, TYPE: PISTOL, MODEL: LCP, CAL: 380,
228. RUGER, TYPE: PISTOL, MODEL: P345, CAL: 45,
229. RUGER, TYPE: REVOLVER, MODEL: SINGLE SIX, CAL: 22,
230. RUGER, TYPE: REVOLVER, MODEL: SINGLE SIX, CAL: 22,
231. RUGER, TYPE: REVOLVER, MODEL: SINGLE SIX, CAL: 22,
232. SIG SAUER (SIG-ARMS), TYPE: PISTOL, MODEL: P250, CAL: 9,
233. SIG SAUER (SIG-ARMS), TYPE: PISTOL, MODEL: sig 250, CAL: 9,
234. SMITH & WESSON, TYPE: PISTOL, MODEL: 2213, CAL: 22,
235. SMITH & WESSON, TYPE: PISTOL, MODEL: M&P 40, CAL: 40,
236. SMITH & WESSON, TYPE: PISTOL, MODEL: SW40VE, CAL: 40,
237. SMITH & WESSON, TYPE: REVOLVER, MODEL: , CAL: 32,
238. SMITH & WESSON, TYPE: REVOLVER, MODEL: , CAL: 32,
239. SMITH & WESSON, TYPE: REVOLVER, MODEL: , CAL: 38,

240. SMITH & WESSON, TYPE: REVOLVER, MODEL: , CAL: 38,
241. SMITH & WESSON, TYPE: REVOLVER, MODEL: 38, CAL: 38,
242. SMITH & WESSON, TYPE: REVOLVER, MODEL: 629 CLASSIC, CAL: 44,
243. SMITH & WESSON, TYPE: REVOLVER, MODEL: 686, CAL: 357,
244. WILSON COMBAT, TYPE: PISTOL, MODEL: KZ-45, CAL: 45,
245. COLT, TYPE: RIFLE, MODEL: MATCH TRGT COMP HBAR, CAL: 223,
246. ESSENTIAL ARMS INC, TYPE: RIFLE, MODEL: J15-F, CAL: 223,
247. KAHR ARMS - AUTO ORDNANCE, TYPE: RIFLE, MODEL: 1927A1, CAL: 45, 251.
248. MARLIN FIREARMS CO., TYPE: RIFLE, MODEL: 105, CAL: 22,
249. MARLIN FIREARMS CO., RIFLE, MODEL: 15YN LITTLE BUCKAROO, CAL: 22,
250. MARLIN FIREARMS CO., TYPE: RIFLE, MODEL: 336, CAL: 30-30,
251. REMINGTON ARMS COMPANY, INC., TYPE: SHOTGUN, MODEL: 48, CAL: 12,
252. ROCK RIVER ARMS, INC., TYPE: RIFLE, MODEL: LAR 8, CAL: 308,
253. RUGER, TYPE: RIFLE, MODEL: 10/22, CAL: 22,
254. SAVAGE, TYPE: RIFLE, MODEL: , CAL: 22,
255. WEATHERBY, TYPE: RIFLE, MODEL: MARK V, CAL: 270,
256. WINCHESTER, TYPE: RIFLE, MODEL: , CAL: 223,
257. WINCHESTER, TYPE: RIFLE, MODEL: 70, CAL: 300,
258. WINCHESTER, TYPE: RIFLE, MODEL: 70, CAL: 7,
259. WINCHESTER, TYPE: SHOTGUN, MODEL: 37A, CAL: 20,
260. BROWNING, TYPE: SHOTGUN, MODEL: BPS, CAL: 12,
261. IVER JOHNSON, TYPE: SHOTGUN, MODEL: , CAL: 12,
262. WEATHERBY, TYPE: SHOTGUN, MODEL: ORION, CAL: 12,
263. ARMI GALESINI, TYPE: PISTOL, CAL: 6.35,
264. ARMI GALESINI, TYPE: PISTOL, CAL: 6.35,
265. ASTRA, TYPE: PISTOL, CAL: 6.35,
266. ASTRA, TYPE: PISTOL, MODEL: 200 FIRECAT, CAL: 25,
267. ASTRA, TYPE: PISTOL, MODEL: CONSTABLE, CAL: 22,
268. BAUER FIREARMS CORP., TYPE: PISTOL, MODEL: 25SS, CAL: 25
269. BAUER FIREARMS CORP., TYPE: PISTOL, MODEL: 25SS, CAL: 25,
270. BAUER FIREARMS CORP., TYPE: PISTOL, MODEL: 25SS, CAL: 25,
271. BC ENGINEERING, LLC, TYPE: REVOLVER, MODEL: B C SPECIAL, CAL: 22,
272. BERETTA USA CORP, TYPE: PISTOL, MODEL: 21A, CAL: 22,
273. BERNARDELLI, VINCENZO, TYPE: PISTOL, CAL: 22,
274. BROWNING, TYPE: PISTOL, MODEL: Unknown, CAL: 6 mm,
275. BROWNING, TYPE: PISTOL, MODEL: Unknown, CAL: 6 mm,
276. COLT, TYPE: PISTOL, MODEL: Automatic, CAL: 32,
277. COLT, TYPE: PISTOL, MODEL: COLT AUTO, CAL: 25,
278. COLT, TYPE: PISTOL, MODEL: COLT AUTO, CAL: 25,
279. COLT, TYPE: PISTOL, MODEL: JUNIOR, CAL: 22,
280. COLT, TYPE: PISTOL, MODEL: MATCH TARGET, CAL: 22,
281. COLT, TYPE: PISTOL, MODEL: MKIV, CAL: 45,
282. COLT, TYPE: PISTOL, MODEL: OFFICERS, CAL: 45,
283. COLT, TYPE: REVOLVER, MODEL: 1871, CAL: 38 WCF,
284. COLT, TYPE: REVOLVER, MODEL: ARMY SPECIAL, CAL: 38,

285. COLT, TYPE: REVOLVER, MODEL: DIAMONDBACK, CAL: 22,
286. COLT, TYPE: REVOLVER, MODEL: DIAMONDBACK, CAL: 22,
287. COLT, TYPE: REVOLVER, MODEL: Double Diamond, CAL: 357,
288. COLT, TYPE: REVOLVER, MODEL: FRONTIER SCOUT, CAL: 22,
289. COLT, TYPE: REVOLVER, MODEL: PEACEMAKER, CAL: 22,
290. COLT, TYPE: REVOLVER, MODEL: PYTHON, CAL: 357,
291. COLT, TYPE: REVOLVER, MODEL: PYTHON, CAL: 357,
292. COLT, TYPE: REVOLVER, MODEL: SAA, CAL: 357,
293. COLT, TYPE: REVOLVER, MODEL: unknown, CAL: 38,
294. ERMA WERKE GMBH, TYPE: PISTOL, MODEL: KGP68A, CAL: 380,
295. ERMA WERKE GMBH, TYPE: PISTOL, MODEL: KGP68A, CAL: 380,
296. F.N. (FN HERSTAL), TYPE: PISTOL, MODEL: FIVE-SEVEN, CAL: 57,
297. F.N. (FN HERSTAL), TYPE: PISTOL, MODEL: unknown, CAL: 635,
298. FIE, TYPE: PISTOL, MODEL: A27, CAL: 25,
299. HARRINGTON AND RICHARDSON, TYPE: REVOLVER, MODEL: 950, CAL: 22,
300. IVER JOHNSON, TYPE: REVOLVER, MODEL: 844, CAL: 22,
301. RUGER, TYPE: PISTOL, MODEL: LCP, CAL: 380,
302. SIG-SAUER, TYPE: PISTOL, MODEL: P226 ELITE, CAL: 40,
303. SMITH & WESSON, TYPE: PISTOL, MODEL: 2213, CAL: 22,
304. SMITH & WESSON, TYPE: REVOLVER, MODEL: 10, CAL: 38,
305. SMITH & WESSON, TYPE: REVOLVER, MODEL: 442, CAL: 38,
306. SMITH & WESSON, TYPE: REVOLVER, MODEL: 64, CAL: 38,
307. SPHINX ENGINEERING CO., TYPE: PISTOL, MODEL: AT2000H, CAL: 9,
308. TAURUS INTERNATIONAL, TYPE: PISTOL, MODEL: PT738, CAL: 380,
309. TAURUS, TYPE: REVOLVER, MODEL: 82, CAL: 38,
310. TAURUS, TYPE: REVOLVER, MODEL: 82, CAL:38,
311. UNKNOWN MANUFACTURER, TYPE: PISTOL, MODEL: automatic pistol, CAL: 635,
312. UNKNOWN MANUFACTURER, PISTOL, MODEL: Pistolet Automatique, CAL: 6.35,
313. UNKNOWN MANUFACTURER, TYPE: REVOLVER, MODEL: 1892, CAL: 8mm,
314. WILKINSON ARMS, TYPE: PISTOL, MODEL: SHERRY, CAL: 22,
315. MAUSER, TYPE: RIFLE, MODEL: 1942, CAL: Unknown,
316. MAUSER, TYPE: RIFLE, MODEL: 1942, CAL: Unknown,
317. NORINCO (NORTH CHINA INDUSTRIES), TYPE: RIFLE, MODEL: SKS, CAL: 762,
318. REMINGTON ARMS COMPANY, INC., TYPE: RIFLE, MODEL: 41, CAL: 22,
319. UNKNOWN MANUFACTURER, TYPE: RIFLE, MODEL: 1889, CAL: 7.5 x ,
320. WINCHESTER, TYPE: RIFLE, MODEL: 02A, CAL: 22, 333.
321. REMINGTON ARMS COMPANY, INC., TYPE: SHOTGUN, MODEL: 572, CAL: 22,
322. REMINGTON ARMS COMPANY, INC., TYPE: SHOTGUN, MODEL: Unk, CAL: 12,
323. WINCHESTER, TYPE: SHOTGUN, MODEL: 1897, CAL: 12.

Substitute Assets

If any of the property described above, 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 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 pursuant to Title 21, United States Code, Section 853(p)

COUNT FIFTEEN
[Structuring]
31 U.S.C. § 6324(a)(3)

From on or about September 29, 2011, until on or about October 3, 2011, in the Eastern District of Tennessee, the defendant, KEVIN DAWSON, did knowingly and for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a), and the regulations promulgated thereunder, structure and assist in structuring a transaction with one or more domestic financial institutions, as set forth below:

<u>Date</u>	<u>Financial Transaction</u>
09/29/2011	\$9,000 cash withdrawal
10/03/2011	\$3,800 cash withdrawal

In violation of Title 31, United States Code, Section 5324(a)(3); Title 31, Code of Federal Regulations, Section 103.11.

COUNT SIXTEEN
[Concealment of Assets in Bankruptcy Proceedings]
18 U.S.C. § 152(1)

From on or about October 20, 2011 to April 25, 2012, in the Eastern District of Tennessee and elsewhere, the defendant, KEVIN DAWSON, did knowingly and fraudulently conceal from the bankruptcy trustee and others, in connection with the case In re Kevin Dawson, Case No. 11-15833 in the United States Bankruptcy Court for the Eastern District of Tennessee, a case under Title 11, United States Code, property belonging to the estate of the debtor, that is: funds of \$6,500.00 withdrawn by him from his financial account at Dupont Community Credit Union on or about September 29, 2011.

In violation of Title 18, United States Code, Section 152(1).

COUNTS SEVENTEEN THROUGH NINETEEN
[Obstruction of Bankruptcy Proceedings]
18 U.S.C. § 1519

The Grand Jury further charges that on or about October 20, 2011 in the Eastern District of Tennessee and elsewhere, the defendant, KEVIN DAWSON, with the intent to impede, obstruct, and influence the proper administration of a case filed under Title 11 of the United States Code, specifically, the case of In re Kevin Dawson, Case No. 11-15833 in the United States Bankruptcy Court for the Eastern District of Tennessee, did knowingly make a false entry in a document, as follows:

<u>COUNT</u>	<u>STATEMENT</u>
17	In answer to Question 10 of his Statement of Financial Affairs, which required him to “list all property, other than property transferred in the ordinary course of the business or financial affairs of the debtor, transferred either absolutely or as security within two years immediately preceding the commencement of this case .

. .,” he knowingly stated “NONE,” when in fact he transferred (1) a firearm to a convicted felon, (2) a 2001 Chevrolet truck, (3) a trailer, (4) a lawnmower, and (5) lawn equipment, within two years immediately preceding the commencement of the case of In re Kevin Dawson, Case No. 11-15833 in the United States Bankruptcy Court for the Eastern District of Tennessee.

18 In answer to Question 18(a) of his Statement of Financial Affairs, which required him to “list the names, addresses, taxpayer identification numbers, nature of the businesses, and beginning and ending dates of all businesses in which the debtor was an officer, director, partner, or managing executive of a corporation, partner in a partnership, sole proprietor, or was self-employed in a trade, profession, or other activity either part-time or full-time within six years immediately preceding the commencement of this case . . .”, he knowingly stated “NONE”, when in fact he was an officer, director, partner, or managing executive of a corporation, partner in a partnership, sole proprietor, or was self-employed at (1)Amway, (2) KND Enterprise, (3) KND Lawn Service, (4) Kevin W. Dawson Lawn Service, and (5) TN Goods within six years immediately preceding the commencement of the case of In re Kevin Dawson, Case No. 11-15833 in the United States Bankruptcy Court for the Eastern District of Tennessee.

19 In answer to Question 8 of his Schedule B, Schedule of Personal Property, which required him to state all firearms he had an interest in, he knowingly stated “NONE”, when in fact he had an interest in a firearm.

All in violation of Title 18, United States Code, Section 1519.

COUNT TWENTY
[False Statement]
18 U.S.C. § 1001

1. The United States Trustee is an agency of the United States that is charged with, among other things, investigating bankruptcy cases.


2. On or about April 25, 2012, in the Eastern District of Tennessee, the defendant, KEVIN DAWSON, in a matter within the jurisdiction of the executive branch of the United States, knowingly and willfully made materially false statements to an attorney employed by the United States Trustee investigating the bankruptcy fraud violations charged in counts 16 through 20 and incorporated herein, specifically, he stated to the attorney employed by the United States Trustee, in substance, that he did not transfer any other property, other than a 2001 Chevrolet Silverado, in 2011 or 2012, when in fact he transferred at least 20 firearms during 2011 and 2012.

In violation of Title 18, United States Code, Section 1001.

A TRUE BILL:

SIGNATURE REDACTED

WILLIAM C. KILLIAN
UNITED STATES ATTORNEY

By: 
Terra L. Bay
Assistant U.S. Attorney