

FILED

NOV 13 2007

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION AT DAYTON

JAMES BONINI, Clerk  
DAYTON, OHIO

UNITED STATES OF AMERICA, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 1. ANTONIO PIERCE a/k/a )  
 Tony a/k/a Little Tone )  
 (Counts 1-10, 16-20, 22-23) )  
 )  
 2. REGINALD LANGFORD a/k/a )  
 Reggie )  
 (Counts 1-2, 4, 6, )  
 9-15, 19-20, 22-23) )  
 )  
 3. )  
 )  
 )  
 4. ROBERT D. BARNETT a/k/a )  
 Rob )  
 (Counts 1, 16-18, 20-23) )  
 )  
 5. JERRY BROWN a/k/a Old )  
 School a/k/a Main )  
 (Counts 1, 18-20, 22-23) )  
 )  
 6. PARIS BOYD )  
 (Counts 1, 3, 20) )  
 )  
 7. DELOREAN DAVIS a/k/a )  
 Dee-Lo )  
 (Counts 1, 19, 20) )  
 )  
 8. ANTHONY BROWN a/k/a )  
 Uncle Tony )  
 (Counts 1, 3, 17, 19, 20) )  
 )  
 9. KEITH B. WILKES SR. )  
 a/k/a Senior )  
 (Counts 1, 2, 4-8, 20) )  
 )  
 10. HENRY PIERCE )  
 (Counts 22-23) )  
 )  
 Defendants. )

No.

I N D I C T M E N T **3:07 cr 0183**

18 U.S.C. § 2 **WALTER HERBERT RICE**  
 18 U.S.C. § 371  
 18 U.S.C. § 924(c)  
 18 U.S.C. § 922(a)(1)(A)  
 18 U.S.C. § 922(g)(1)  
 21 U.S.C. § 841(a)(1)  
 21 U.S.C. § 846  
 21 U.S.C. § 861

The Grand Jury charges:

COUNT ONE

[21 U.S.C. § 846]

Between a beginning date unknown, but at least by in or about April 2007, and November 2007, in Montgomery County, within the Southern District of Ohio, defendants ANTONIO PIERCE a/k/a Tony a/k/a Litte Tone ("ANTONIO PIERCE"), REGINALD LANGFORD a/k/a Reggie ("LANGFORD"), , ROBERT D. BARNETT a/k/a Rob ("BARNETT"), JERRY BROWN a/k/a Old School a/k/a Main ("JERRY BROWN"), PARIS BOYD ("BOYD"), DELOREAN DAVIS a/k/a Dee-Lo ("DAVIS"), ANTHONY BROWN a/k/a Uncle Tony ("ANTHONY BROWN"), and KEITH B. WILKES SR. a/k/a Senior ("WILKES"), and others known and unknown to the Grand Jury, conspired to knowingly and intentionally distribute and possess with intent to distribute a mixture or substance containing cocaine base (commonly known as crack cocaine) -- namely, in excess of 50 grams of a mixture or substance containing cocaine base -- a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(A).

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COUNT TWO

[21 U.S.C. § 841(a)(1) and (b)(1)(C); 18 U.S.C. § 2]

On or about June 7, 2007, in Montgomery County, within the Southern District of Ohio, defendants ANTONIO PIERCE, LANGFORD and WILKES, aiding and abetting each other, knowingly and intentionally distributed a mixture or substance containing cocaine base (commonly known as crack cocaine), a schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C), Title 18, United States Code, Section 2, and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT THREE

[21 U.S.C. § 841(a)(1) and (b)(1)(C); 18 U.S.C. § 2]

On or about June 13, 2007, in Montgomery County, within the Southern District of Ohio, defendants ANTONIO PIERCE, BOYD, and ANTHONY BROWN, aiding and abetting each other, knowingly and intentionally distributed a mixture or substance containing cocaine base (commonly known as crack cocaine), a schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C), Title 18, United States Code, Section 2, and Pinkerton v. United States, 328 U.S. 640 (1946).

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COUNT FOUR

[21 U.S.C. § 841(a)(1) and (b)(1)(B); 18 U.S.C. § 2]

On or about June 20, 2007, in Montgomery County, within the Southern District of Ohio, defendants ANTONIO PIERCE, LANGFORD, and WILKES, aiding and abetting each other, knowingly and intentionally distributed a mixture or substance containing cocaine base (commonly known as crack cocaine) -- namely, in excess of 5 grams of a mixture or substance containing cocaine base -- a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B), Title 18, United States Code, Section 2, and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT FIVE

[21 U.S.C. § 841(a)(1) and (b)(1)(B); 18 U.S.C. § 2]

On or about June 25, 2007, in Montgomery County, within the Southern District of Ohio, defendants ANTONIO PIERCE and WILKES, aiding and abetting each other, knowingly and intentionally distributed a mixture or substance containing cocaine base (commonly known as crack cocaine) -- namely, in excess of 5 grams of a mixture or substance containing cocaine base -- a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B), Title 18, United States Code, Section 2, and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT SIX

[21 U.S.C. § 841(a)(1) and (b)(1)(B); 18 U.S.C. § 2]

On or about June 29, 2007, in Montgomery County, within the Southern District of Ohio, defendants **ANTONIO PIERCE, LANGFORD,** and **WILKES**, aiding and abetting each other, knowingly and intentionally distributed a mixture or substance containing cocaine base (commonly known as crack cocaine) -- namely, in excess of 5 grams of a mixture or substance containing cocaine base -- a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B), Title 18, United States Code, Section 2, and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT SEVEN

[21 U.S.C. § 861(a)(1) and (d); 18 U.S.C. § 2]

On or about July 6, 2007, in Montgomery County, within the Southern District of Ohio, defendant **ANTONIO PIERCE** and **WILKES**, each of whom was at least eighteen years of age, aiding and abetting each other, knowingly and intentionally employed, hired, used, persuaded, induced, and enticed a person under eighteen years of age to distribute a mixture or substance containing cocaine base (commonly known as crack cocaine) -- namely, in excess of 5 grams of a mixture or substance containing cocaine base -- a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B). In

doing, defendants ANTONIO PIERCE and WILKES knowingly provided and distributed cocaine base to a person under eighteen years of age.

In violation of Title 21, United States Code, Section 861(a)(1) and (d), and Title 18, United States Code, Section 2.

COUNT EIGHT

[21 U.S.C. § 841(a)(1) and (b)(1)(B); 18 U.S.C. § 2]

On or about July 6, 2007, in Montgomery County, within the Southern District of Ohio, defendants ANTONIO PIERCE and WILKES, aiding and abetting each other, knowingly and intentionally distributed a mixture or substance containing cocaine base (commonly known as crack cocaine) -- namely, in excess of 5 grams of a mixture or substance containing cocaine base -- a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B), and Title 18, United States Code, Section 2.

COUNT NINE

[21 U.S.C. § 841(a)(1) and (b)(1)(A); 18 U.S.C. § 2]

On or about July 12, 2007, in Montgomery County, within the Southern District of Ohio, defendants ANTONIO PIERCE, LANGFORD and . aiding and abetting each other, knowingly and intentionally distributed a mixture or substance containing cocaine base (commonly known as crack cocaine) -- namely, in

excess of 50 grams of a mixture or substance containing cocaine base -- a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A), Title 18, United States Code, Section 2, and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT TEN

[21 U.S.C. § 841(a)(1) and (b)(1)(A); 18 U.S.C. § 2]

On or about July 17, 2007, in Montgomery County, within the Southern District of Ohio, defendants ANTONIO PIERCE, LANGFORD, and , aiding and abetting each other, knowingly and intentionally distributed a mixture or substance containing cocaine base (commonly known as crack cocaine) -- namely, in excess of 50 grams of a mixture or substance containing cocaine base -- a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT ELEVEN

[21 U.S.C. § 841(a)(1) and (b)(1)(C)]

On or about August 8, 2007, in Montgomery County, within the Southern District of Ohio, defendant LANGFORD knowingly and intentionally distributed a mixture or substance containing

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cocaine base (commonly known as crack cocaine), a schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TWELVE

[21 U.S.C. § 841(a)(1) and (b)(1)(B)]

On or about August 14, 2007, in Montgomery County, within the Southern District of Ohio, defendant LANGFORD, knowingly and intentionally possessed with intent to distribute a mixture or substance containing cocaine base (commonly known as crack cocaine) -- namely, in excess of 5 grams of a mixture or substance containing cocaine base -- a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT THIRTEEN

[21 U.S.C. § 841(a)(1) and (b)(1)(B)]

On or about August 21, 2007, in Montgomery County, within the Southern District of Ohio, defendant LANGFORD knowingly and intentionally distributed a mixture or substance containing cocaine base (commonly known as crack cocaine) -- namely, in

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excess of 5 grams of a mixture or substance containing cocaine base -- a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT FOURTEEN

[18 U.S.C. § 922(g)(1) and 924(a)(2)]

On or about August 21, 2007, in Montgomery County, within the Southern District of Ohio, defendant LANGFORD knowingly possessed a firearm, namely, one Jennings/Bryco Model 59 9mm handgun, and ammunition, namely, five Winchester 9mm bullets, in and affecting interstate and foreign commerce.

Such possession occurred after defendant LANGFORD had been convicted of the following felony punishable by a term of imprisonment exceeding one year -- namely, on or about January 28, 1999, in the Court of Common Pleas, Montgomery County, Ohio, Case Number 1998CR04664, of child endangerment, in violation of Ohio Revised Code Section 2919.22.

In violation of Title 18, United States Code, Section 922(g)(1) and 924(a)(2).

COUNT FIFTEEN

[21 U.S.C. § 841(a)(1) and (b)(1)(C)]

On or about August 22, 2007, in Montgomery County, within the Southern District of Ohio, defendant LANGFORD knowingly and intentionally distributed a mixture or substance containing

cocaine base (commonly known as crack cocaine), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a) (1) and (b) (1) (C).

COUNT SIXTEEN

[21 U.S.C. § 841(a) (1) and (b) (1) (C); 18 U.S.C. § 2]

On or about September 18, 2007, in Montgomery County, within the Southern District of Ohio, defendants **ANTONIO PIERCE** and **BARNETT**, aiding and abetting each other, knowingly and intentionally distributed a mixture or substance containing cocaine base (commonly known as crack cocaine), a schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a) (1) and (b) (1) (C), Title 18, United States Code, Section 2, and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT SEVENTEEN

[21 U.S.C. § 841(a) (1) and (b) (1) (B); 18 U.S.C. § 2]

On or about October 17, 2007, in Montgomery County, within the Southern District of Ohio, defendants **ANTONIO PIERCE**, **BARNETT**, and **ANTHONY BROWN**, aiding and abetting each other, knowingly and intentionally distributed a mixture or substance containing cocaine base (commonly known as crack cocaine) --

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namely, in excess of 5 grams of a mixture or substance containing cocaine base -- a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B), Title 18, United States Code, Section 2, and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT EIGHTEEN

[21 U.S.C. § 841(a)(1) and (b)(1)(C); 18 U.S.C. § 2]

On or about October 23, 2007, in Montgomery County, within the Southern District of Ohio, defendants ANTONIO PIERCE, BARNETT, and JERRY BROWN, aiding and abetting each other, knowingly and intentionally distributed a mixture or substance containing cocaine base (commonly known as crack cocaine), a schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C), Title 18, United States Code, Section 2, and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT NINETEEN

[21 U.S.C. § 841(a)(1) and (b)(1)(B); 18 U.S.C. § 2]

On or about November 1, 2007, in Montgomery County, within the Southern District of Ohio, defendants ANTONIO PIERCE, LANGFORD, DAVIS, JERRY BROWN, and ANTHONY BROWN, aiding and abetting each other, knowingly and intentionally distributed a mixture or substance containing cocaine base (commonly known as crack cocaine) -- namely, in excess of 5 grams of a mixture or

substance containing cocaine base -- a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B), Title 18, United States Code, Section 2, and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT TWENTY

[18 U.S.C. § 924(c)]

On or about dates between October 17, 2007 and November 1, 2007, in Montgomery County, within the Southern District of Ohio, defendants ANTONIO PIERCE, LANGFORD, BARNETT, JERRY BROWN, BOYD, DAVIS, ANTHONY BROWN and WILKES, possessed a firearm -- namely, a Millennium Taurus .32 caliber handgun and a black pistol identified as the "Equalizer" -- in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States -- namely, a conspiracy to distribute and possess with intent to distribute a mixture or substance containing cocaine base (commonly known as crack cocaine) in violation of 21 U.S.C. §§ 841 and 846.

In violation of Title 18, United States Code, Section 924(c)(1)(A) and Pinkerton v. United States, 328 U.S. 640 (1946).

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COUNT TWENTY-ONE

[18 U.S.C. § 922(g)(1) and 924(a)(2)]

In or around October 2007, in Montgomery County, within the Southern District of Ohio, defendant **BARNETT** knowingly possessed a firearm, namely, a Millennium Taurus .32 caliber handgun, in and affecting interstate and foreign commerce.

Such possession occurred after defendant **BARNETT** had been convicted of the following felonies, each punishable by a term of imprisonment exceeding one year, namely:

(a) on or about December 16, 1998, in the Court of Common Pleas, Montgomery County, Ohio, Case Number 1997CR3055, of burglary of an occupied structure, in violation of Ohio Revised Code Section 2911.12(a)(3); and

(b) on or about September 2, 2003, in the Court of Common Pleas, Montgomery County, Ohio, Case Number 2003CR2978, of CCW (loaded), in violation of Ohio Revised Code Section 2923.12(a).

In violation of Title 18, United States Code, Section 922(g)(1) and 924(a)(2).

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COUNT TWENTY-TWO

[18 U.S.C. § 371]

I. OBJECT OF THE CONSPIRACY

Between a beginning date unknown to the Grand Jury, but at least by July 2007, and in or around November 2007, in Montgomery County, within the Southern District of Ohio, defendants LANGFORD, ANTONIO PIERCE, BARNETT, JERRY BROWN, and HENRY PIERCE, conspired to commit an offense under Title 18, United States Code, Section 922(a)(1)(A) - namely, engaging in the business of dealing in firearms without a license.

II. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE ACCOMPLISHED

The object of the conspiracy was to be accomplished, in substance, as follows:

A. Defendants LANGFORD, BARNETT, JERRY BROWN, and HENRY PIERCE obtained and procured various firearms from locations throughout the Dayton, Ohio area.

B. From locations in Dayton and Trotwood, Ohio, defendants LANGFORD, ANTONIO PIERCE, BARNETT, JERRY BROWN, and HENRY PIERCE -- none of whom possessed a Federal Firearms License -- offered to sell to various individuals the firearms that LANGFORD, BARNETT, JERRY BROWN, and HENRY PIERCE procured and obtained.

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C. Defendants LANGFORD, ANTONIO PIERCE, BARNETT, JERRY BROWN, and HENRY PIERCE negotiated the sales price of these firearms.

D. Upon completing the sale of a firearm, defendants LANGFORD, ANTONIO PIERCE, BARNETT, JERRY BROWN, and HENRY PIERCE split the proceeds therefrom.

### III. OVERT ACTS

In furtherance of the conspiracy and to accomplish the object of the conspiracy, defendants LANGFORD, ANTONIO PIERCE, BARNETT, BROWN, and HENRY PIERCE committed various overt acts within the Southern District of Ohio, including, but not limited to, the following:

A. On or about July 17, 2007, while at a residence in Trotwood, Ohio (hereinafter "the Trotwood residence"), defendant LANGFORD indicated to a purported firearms buyer that he, defendant LANGFORD, had access to "Macs" (a type of firearm) for sale.

B. On or about July 17, 2007, while speaking with a purported firearms buyer at the Trotwood residence, defendant ANTONIO PIERCE indicated that he had placed an order of firearms, which he intended to sell.

C. On or about July 17, 2007, while at the Trotwood residence, defendant ANTONIO PIERCE offered to a sell to a purported buyer a Colt .45 firearm.

D. On or about July 17, 2007, while at the Trotwood residence, defendant ANTONIO PIERCE indicated to a purported firearms buyer that he, defendant ANTONIO PIERCE, had access to an AK-47 and a 9mm rifle for sale.

E. On or about August 21, 2007, while near the Trotwood residence, defendant LANGFORD displayed approximately four firearms for sale.

F. On or about August 21, 2007, while near the Trotwood residence, defendant LANGFORD sold to a purported firearms buyer for \$150 one Jennings/Bryco Model 59 9mm handgun as well as five Winchester 9mm bullets.

G. On or about August 22, 2007, while at the Trotwood residence, defendant LANGFORD offered to a sell to a purported firearms buyer a .38 caliber firearm for \$425.

H. On or about August 22, 2007, while at the Trotwood residence, defendant LANGFORD informed a purported firearms buyer that he, defendant LANGFORD, had people that had several .38 caliber firearms for sale.

I. On or about October 23, 2007, while at the Trotwood residence, defendant BARNETT called telephone number (XXX)XXX-XX23 and left a message indicating that he was trying to buy a firearm to sell to a purported firearms buyer.

J. On or about October 23, while at the Trotwood residence, defendant Barnett informed defendants ANTONIO PIERCE and JERRY

BROWN that a purported firearms buyer was attempting to locate a gun to purchase for approximately \$300.

K. On or about October 23, 2007, while at the Trotwood residence, defendant BARNETT offered to sell a black pistol to the purported firearms buyer for \$300.

L. On or about October 23, 2007, while at the Trotwood residence, defendant JERRY BROWN offered to sell an AK-47 to the purported firearms buyer for \$400.

M. On or about October 23, 2007, while at the Trotwood residence, defendant JERRY BROWN offered to sell a .25 caliber handgun to the purported firearms buyer for \$100.

N. On or about October 23, 2007, defendant JERRY BROWN escorted the purported firearms buyer to a residence located in Dayton, Ohio ("the Dayton residence").

O. On or about October 23, 2007, defendant ANTONIO PIERCE followed defendant JERRY BROWN and the purported firearms buyer to the Dayton residence.

P. On or about October 23, 2007, while speaking with the purported firearms buyer outside of the Dayton residence, defendant JERRY BROWN stated: "I have more guns than you can handle son" or words to that effect.

Q. On or about October 23, 2007, while speaking with the purported firearms buyer outside of the Dayton residence, defendant JERRY BROWN produced a Remington Arms 522 Viper .22

caliber rifle, which he offered to sell for \$150.

R. On or about October 23, 2007, while speaking with the purported firearms buyer outside of the Dayton residence, defendant JERRY BROWN indicated that the purported firearms buyer should not touch the rifle because it was loaded.

S. On or about October 23, 2007, while speaking with the purported firearms buyer outside of the Dayton residence, defendant JERRY BROWN also offered to sell a FIE Titan .25 caliber handgun as well as a 92D Beretta Centurion handgun.

T. On or about October 23, 2007, while speaking with the purported firearms buyer outside of the Dayton residence, defendant JERRY BROWN stated that he had an infrared beam targeted on the purported firearms buyer and that, if anything went wrong with the deal, the purported firearms buyer would "feel" defendant JERRY BROWN.

U. On or about October 23, 2007, while speaking with the purported firearms buyer outside of the Dayton residence, defendant JERRY BROWN stated that the rifle and guns could be resold out of state.

V. On or about October 23, 2007, while speaking with the purported firearms buyer outside of the Dayton residence, defendant JERRY BROWN indicated that he was "snatching up" firearms for resale.

W. On or about October 23, 2007, defendant HENRY PIERCE

appeared on the front porch of the Dayton residence with an AK-47.

X. On or about October 23, 2007, while standing on the front porch of the Dayton residence, defendant HENRY PIERCE showed the AK-47 to defendant ANTONIO PIERCE.

Y. On or about October 23, 2007, defendant JERRY BROWN indicated that defendant HENRY PIERCE was selling the AK-47 for \$400.

Z. On or about October 23, 2007, defendant JERRY BROWN provided his telephone numbers to the purported firearms buyer.

AA. On or about October 23, 2007, defendant JERRY BROWN sold the Remington Arms 522 Viper .22 to the purported firearms buyers for \$110.

BB. On or about November 1, 2007, defendant JERRY BROWN escorted the purported firearms purchaser to the Dayton residence.

CC. On or about November 1, 2007, while outside of the Dayton residence, defendants JERRY BROWN and HENRY PIERCE showed to the purported firearms buyer a 92D Beretta Centurion firearm.

DD. On or about November 1, 2007, while outside of the Dayton residence, defendant HENRY PIERCE offered to sell the Beretta handgun for \$300.

EE. On or about November 1, 2007, while outside of the Dayton residence, defendant JERRY BROWN corrected defendant HENRY

PIERCE, indicating that the Beretta was selling for \$350.

FF. On or about November 1, 2007, while outside of the Dayton residence, defendants JERRY BROWN and HENRY PIERCE sold the Beretta handgun for \$350.

GG. On or about November 1, 2007, defendant HENRY PIERCE brought onto the porch of the Dayton residence an AK-47 wrapped in a blanket.

HH. On or about November 1, 2007, while outside of the Dayton residence, defendant HENRY PIERCE displayed the stock of an AK-47 to the purported firearms purchaser.

II. On or about November 1, 2007, while outside of the Dayton residence, defendant HENRY PIERCE indicated that he previously sold another AK-47 to defendant JERRY BROWN.

JJ. On or about November 1, 2007, while outside of the Dayton residence, defendant JERRY BROWN indicated that he sold guns for defendant HENRY PIERCE.

KK. On or about November 1, 2007, while outside of the Dayton residence, defendant HENRY PIERCE indicated that he had installed surveillance cameras outside of the Dayton residence.

LL. On or about November 1, 2007, while outside of the Dayton residence, defendant JERRY BROWN offered to obliterate the serial number on firearms sold to the purported firearms buyer.

MM. On or about November 1, 2007, while outside of the Trotwood residence, defendants ANTONIO PIERCE and LANGFORD

offered to sell firearms to the purported firearms buyer.

NN. On or about November 1, 2007, while outside of the Trotwood residence, defendant ANTONIO PIERCE called defendant HENRY PIERCE concerning an AK-47.

OO. On or about November 1, 2007, defendant LANGFORD retrieved a 9mm High Point rifle from a location near the Trotwood residence.

PP. On or about November 1, 2007, while outside of the Trotwood residence, defendant LANGFORD offered to sell the High Point rifle for \$300.

QQ. On or about November 1, 2007, defendant LANGFORD sold the High Point rifle to the purported firearms buyer for \$300.

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

COUNT TWENTY-THREE

[18 U.S.C. §§ 922(a)(1)(A) and 2]

Between a beginning date unknown, but at least by August 2007, and November 2007, in Montgomery County, within the Central District of California, defendants LANGFORD, ANTONIO PIERCE, BARNETT, JERRY BROWN, and HENRY PIERCE, aiding and abetting each

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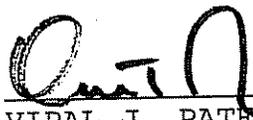
other, wilfully engaged in the business of dealing in firearms without a license.

In violation of Title 18, United States Code, Sections 922(a)(1)(A) and 2.

A TRUE BILL

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Foreperson

GREGORY G. LOCKHART  
United States Attorney

  
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VIPAL J. PATEL  
Deputy Criminal Chief