

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. \_\_\_\_\_  
 :  
 v. : 18 U.S.C. § 371  
 :  
 JOHANNA BETTY YOUNG, : I N F O R M A T I O N  
 a/k/a Ashley Young :

The defendant having waived in open Court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

**DEFENDANT AND CONSPIRATORS**

1. At all times relevant to this Information:

a. Defendant JOHANNA BETTY YOUNG, a/k/a Ashley Young ("JOHANNA YOUNG") was a resident of Fayetteville, North Carolina and was not a federally licensed dealer, manufacturer, or importer of firearms; and

b. Coconspirator Wendelle Ford was a cousin of defendant JOHANNA YOUNG, was a resident of Camden, New Jersey, and was not a federally licensed dealer, manufacturer, or importer of firearms.

c. Coconspirator Wendelle Ford had a prior felony conviction and therefore could not legally purchase or possess firearms.

## CONSPIRACY

2. On or about January 10, 2012, in Camden County, in the District of New Jersey, and elsewhere, defendant

JOHANNA BETTY YOUNG,  
a/k/a Betty Young,

did knowingly and willfully conspire and agree with coconspirator Wendelle Ford and others to engage in the business of importing, manufacturing, and dealing in firearms, and in the course of such business to ship, transport, and receive firearms in interstate and foreign commerce, without being licensed to do so under federal firearms law, contrary to Title 18, United States Code, Section 922(a)(1)(A).

3. It was the object of the conspiracy to obtain firearms in North Carolina and to bring the firearms to New Jersey and sell them there.

4. It was a further part of the conspiracy that in or about early December 2011, coconspirator Wendelle Ford traveled to Fayetteville, North Carolina and gave funds to defendant JOHANNA YOUNG so that she could apply for firearms purchase permits.

5. It was a further part of the conspiracy that in or about early 2012, defendant JOHANNA YOUNG obtained firearms purchase permits in North Carolina and notified coconspirator Wendelle Ford of that fact.

6. It was a part of the conspiracy that in or about early January 2012 coconspirator Wendelle Ford travelled to North Carolina to go shopping for guns with defendant JOHANNA YOUNG.

7. It was a further part of the conspiracy that, at the direction of coconspirator Wendelle Ford and with funds provided by him, defendant JOHANNA YOUNG purchased the following firearms in Fayetteville, North Carolina:

- a. Springfield Armory, Model XDM handgun, serial number MG233050;
- b. Springfield Armory, Model XD45 handgun, serial number US782275;
- c. Squires Bingham, Model Citadel handgun, serial number CIT006595;
- d. Taurus, Model PT740 handgun, serial number 2DM24948;  
and
- e. Kel-Tec Model PF-9 handgun, serial number S2S07.

8. It was a further part of the conspiracy that coconspirator Wendelle Ford traveled back to New Jersey with the five firearms that defendant JOHANNA YOUNG purchased for him.

9. It was a further part of the conspiracy that coconspirator Wendelle Ford paid defendant JOHANNA YOUNG \$200 in New Jersey for each firearm she had purchased for him in North Carolina.

**OVERT ACTS**

10. In furtherance of the conspiracy and to effect the objects thereof, the following overt acts were committed in the District of New Jersey and elsewhere:

a. On or about January 9, 2012, coconspirator Wendelle Ford traveled from Camden, New Jersey to Fayetteville, North Carolina.

b. On or about January 10, 2012, defendant JOHANNA YOUNG, at coconspirator Wendelle Ford's direction and using funds he provided, purchased five firearms from two different gun shops in Fayetteville, North Carolina.

c. On or about January 10, 2012, defendant JOHANNA YOUNG falsely indicated on ATF Forms 4473 and purchase permits she filled out that she was the actual transferee or buyer of the firearms she purchased.

In violation of Title 18, United States Code, Section 371.

\_\_\_\_\_  
PAUL J. FISHMAN  
United States Attorney