

**FILED**

5/26/2021 JMK

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

RONEAL NIGHTENGALE  
and ERIC ROWE

No. **1:21-CR-349**

Violations: Title 18, United States Code,  
Sections 371, 922(g)(1), 922(j), and 922(u)

UNDER SEAL

COUNT ONE

**JUDGE FEINERMAN  
MAGISTRATE JUDGE HARJANI**

The SPECIAL APRIL 2021 GRAND JURY charges:

1. At times material to this indictment:

a. Shoot Point Blank was a federal firearms licensee located at 560 Frontenac

Court, Naperville, Illinois.

b. Shoot Point Blank's inventory contained, among other things, the following

12 firearms, which had been shipped and transported in interstate and foreign commerce:

i. Ceska Zbrojovka, Model 75 SP-01, 9mm pistol, bearing serial number

C796164;

ii. Ceska Zbrojovka, Model P-07, 9mm pistol, bearing serial number

D238603;

iii. Ceska Zbrojovka, Model 75B Omega, 9mm pistol, bearing serial

number D205459;

iv. Ceska Zbrojovka, Model 2075 Rami, 9mm pistol, bearing serial

number D146225;

v. Ceska Zbrojovka, Model P-09, 9mm pistol, bearing serial number

C733627;

- vi. Ceska Zbrojovka, Model Shadow 2, 9mm pistol, bearing serial number D170522;
- vii. HS Produkt/Springfield Armory, Model XD-9, 9mm pistol, bearing serial number AT131077;
- viii. HS Produkt/Springfield Armory, Model XDM Elite, 9mm pistol, bearing serial number BY119169;
- ix. HS Produkt/Springfield Armory, Model XDE-9, 9mm pistol, bearing serial number AT143334;
- x. HS Produkt/Springfield Armory, Model Hellcat, 9mm pistol, bearing serial number BY148449;
- xi. HS Produkt/Springfield Armory, Model XD-9, 9mm pistol, bearing serial number AT215026; and
- xii. HS Produkt/Springfield Armory, Model XDM Elite, 9mm pistol, bearing serial number AT233578.

2. On or about June 1, 2020, at Naperville, in the Northern District of Illinois, Eastern Division,

RONEAL NIGHTENGALE and  
ERIC ROWE,

defendants herein, did conspire with each other, and others known and unknown to the grand jury, to steal and unlawfully take and carry away from the premises of Shoot Point Blank, which is licensed to engage in the business of dealing in firearms, a firearm in the licensee's business

inventory, which firearm previously had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(u).

3. It was part of the conspiracy that on or about June 1, 2020, defendants stole approximately 12 firearms from Shoot Point Blank, which is a federally licensed firearms dealer located in Naperville, Illinois.

4. It was further part of the conspiracy that defendants misrepresented, concealed, and hid, and caused to be misrepresented, concealed, and hidden, and attempted to misrepresent, conceal, and hide, the nature and purpose of the conspiracy.

#### Overt Acts

5. It was further part of the conspiracy that defendants committed one or more of the following acts, among others, in furtherance of and to effect the objects of the conspiracy:

a. On or about June 1, 2020, at approximately 2:28 p.m., ROWE conducted a Google search for "Shoot Point Blank Naperville."

b. On or about June 1, 2020, at approximately 6:48 p.m., NIGHTENGALE conducted a Google Maps search for "Shoot Point Blank Naperville, 560 Frontenac Rd #1709, Naperville, IL 60563."

c. On or about June 1, 2020, at approximately 9:00 p.m., NIGHTENGALE drove ROWE and Co-Conspirator A to Shoot Point Blank, located in Naperville, Illinois, in a Mitsubishi Galant sedan.

d. On or about June 1, 2020, at approximately 9:01 p.m., ROWE and Co-Conspirator A burglarized Shoot Point Blank.

e. On or about June 1, 2020, at approximately 9:01 p.m., ROWE and Co-Conspirator A stole approximately 12 firearms from Shoot Point Blank, namely a Ceska Zbrojovka, Model 75 SP-01, 9mm pistol, bearing serial number C796164; a Ceska Zbrojovka, Model P-07, 9mm pistol, bearing serial number D238603; a Ceska Zbrojovka, Model 75B Omega, 9mm pistol, bearing serial number D205459; a Ceska Zbrojovka, Model 2075 Rami, 9mm pistol, bearing serial number D146225; a Ceska Zbrojovka, Model P-09, 9mm pistol, bearing serial number C733627; a Ceska Zbrojovka, Model Shadow 2, 9mm pistol, bearing serial number D170522; a HS Produkt/Springfield Armory, Model XD-9, 9mm pistol, bearing serial number AT131077; a HS Produkt/Springfield Armory, Model XDM Elite, 9mm pistol, bearing serial number BY119169; a HS Produkt/Springfield Armory, Model XDE-9, 9mm pistol, bearing serial number AT143334; a HS Produkt/Springfield Armory, Model Hellcat, 9mm pistol, bearing serial number BY148449; a HS Produkt/Springfield Armory, Model XD-9, 9mm pistol, bearing serial number AT215026; and a HS Produkt/Springfield Armory, Model XDM Elite, 9mm pistol, bearing serial number AT233578.

f. On or about June 1, 2020, NIGHTENGALE drove ROWE, Co-Conspirator A, and the firearms they had stolen, away from Shoot Point Blank.

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

COUNT TWO

The SPECIAL APRIL 2021 GRAND JURY further charges:

On or about June 1, 2020, at Naperville, in the Northern District of Illinois, Eastern Division,

RONEAL NIGHTENGALE and  
ERIC ROWE,

defendants herein, did knowingly steal and unlawfully take and carry away from the premises of Shoot Point Blank, which is licensed to engage in the business of dealing in firearms, a firearm in the licensee's business inventory, namely, a Ceska Zbrojovka, Model 75 SP-01, 9mm pistol, bearing serial number C796164; a Ceska Zbrojovka, Model P-07, 9mm pistol, bearing serial number D238603; a Ceska Zbrojovka, Model 75B Omega, 9mm pistol, bearing serial number D205459; a Ceska Zbrojovka, Model 2075 Rami, 9mm pistol, bearing serial number D146225; a Ceska Zbrojovka, Model P-09, 9mm pistol, bearing serial number C733627; a Ceska Zbrojovka, Model Shadow 2, 9mm pistol, bearing serial number D170522; a HS Produkt/Springfield Armory, Model XD-9, 9mm pistol, bearing serial number AT131077; a HS Produkt/Springfield Armory, Model XDM Elite, 9mm pistol, bearing serial number BY119169; a HS Produkt/Springfield Armory, Model XDE-9, 9mm pistol, bearing serial number AT143334; a HS Produkt/Springfield Armory, Model Hellcat, 9mm pistol, bearing serial number BY148449; a HS Produkt/Springfield Armory, Model XD-9, 9mm pistol, bearing serial number AT215026; and a HS Produkt/Springfield Armory, Model XDM Elite, 9mm pistol, bearing serial number AT233578, which firearm previously had been shipped and transported in interstate and foreign commerce;

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

**COUNT THREE**

The SPECIAL APRIL 2021 GRAND JURY further charges:

On or about June 1, 2020, at Naperville, in the Northern District of Illinois, Eastern Division,

RONEAL NIGHTENGALE and  
ERIC ROWE,

defendants herein, knowingly possessed a stolen firearm, namely, a Ceska Zbrojovka, Model 75 SP-01, 9mm pistol, bearing serial number C796164; a Ceska Zbrojovka, Model P-07, 9mm pistol, bearing serial number D238603; a Ceska Zbrojovka, Model 75B Omega, 9mm pistol, bearing serial number D205459; a Ceska Zbrojovka, Model 2075 Rami, 9mm pistol, bearing serial number D146225; a Ceska Zbrojovka, Model P-09, 9mm pistol, bearing serial number C733627; a Ceska Zbrojovka, Model Shadow 2, 9mm pistol, bearing serial number D170522; a HS Produkt/Springfield Armory, Model XD-9, 9mm pistol, bearing serial number AT131077; a HS Produkt/Springfield Armory, Model XDM Elite, 9mm pistol, bearing serial number BY119169; a HS Produkt/Springfield Armory, Model XDE-9, 9mm pistol, bearing serial number AT143334; a HS Produkt/Springfield Armory, Model Hellcat, 9mm pistol, bearing serial number BY148449; a HS Produkt/Springfield Armory, Model XD-9, 9mm pistol, bearing serial number AT215026; and a HS Produkt/Springfield Armory, Model XDM Elite, 9mm pistol, bearing serial number AT233578, which firearm had traveled in interstate and foreign commerce prior to defendants' possession of the firearm, knowing and having reasonable cause to believe the firearm was stolen;

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

## COUNT FOUR

The SPECIAL APRIL 2021 GRAND JURY further charges:

On or about June 1, 2020, at Naperville, in the Northern District of Illinois, Eastern Division,  
and elsewhere,

RONEAL NIGHTENGALE and  
ERIC ROWE,

defendants herein, knowing that they had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, a firearm, namely, a Ceska Zbrojovka, Model 75 SP-01, 9mm pistol, bearing serial number C796164; a Ceska Zbrojovka, Model P-07, 9mm pistol, bearing serial number D238603; a Ceska Zbrojovka, Model 75B Omega, 9mm pistol, bearing serial number D205459; a Ceska Zbrojovka, Model 2075 Rami, 9mm pistol, bearing serial number D146225; a Ceska Zbrojovka, Model P-09, 9mm pistol, bearing serial number C733627; a Ceska Zbrojovka, Model Shadow 2, 9mm pistol, bearing serial number D170522; a HS Produkt/Springfield Armory, Model XD-9, 9mm pistol, bearing serial number AT131077; a HS Produkt/Springfield Armory, Model XDM Elite, 9mm pistol, bearing serial number BY119169; a HS Produkt/Springfield Armory, Model XDE-9, 9mm pistol, bearing serial number AT143334; a HS Produkt/Springfield Armory, Model Hellcat, 9mm pistol, bearing serial number BY148449; a HS Produkt/Springfield Armory, Model XD-9, 9mm pistol, bearing serial number AT215026; and a HS Produkt/Springfield Armory, Model XDM Elite, 9mm pistol, bearing serial number AT233578, which firearm had traveled in interstate and foreign commerce prior to defendants' possession of the firearm;

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

## FORFEITURE ALLEGATION

The SPECIAL APRIL 2021 GRAND JURY alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Sections 922(g)(1), 922(j), and 922(u), as set forth in this Indictment, defendants shall forfeit to the United States of America any firearm involved and used in the offenses, as provided in Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

2. The property to be forfeited includes, but is not limited to, a Ceska Zbrojovka, Model 75 SP-01, 9mm pistol, bearing serial number C796164; a Ceska Zbrojovka, Model P-07, 9mm pistol, bearing serial number D238603; a Ceska Zbrojovka, Model 75B Omega, 9mm pistol, bearing serial number D205459; a Ceska Zbrojovka, Model 2075 Rami, 9mm pistol, bearing serial number D146225; a Ceska Zbrojovka, Model P-09, 9mm pistol, bearing serial number C733627; a Ceska Zbrojovka, Model Shadow 2, 9mm pistol, bearing serial number D170522; a HS Produkt/Springfield Armory, Model XD-9, 9mm pistol, bearing serial number AT131077; a HS Produkt/Springfield Armory, Model XDM Elite, 9mm pistol, bearing serial number BY119169; a HS Produkt/Springfield Armory, Model XDE-9, 9mm pistol, bearing serial number AT143334; a HS Produkt/Springfield Armory, Model Hellcat, 9mm pistol, bearing serial number BY148449; a HS Produkt/Springfield Armory, Model XD-9, 9mm



pistol, bearing serial number AT215026; and a HS Produkt/Springfield Armory, Model XDM Elite, 9mm pistol, bearing serial number AT233578.

A TRUE BILL:

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FOREPERSON

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Signed by Timothy J. Storino on behalf of the  
UNITED STATES ATTORNEY