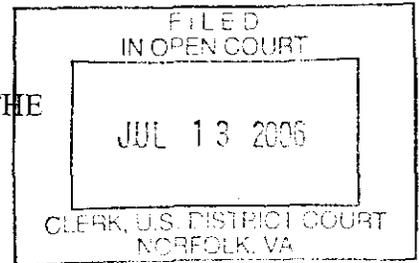


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION



UNITED STATES OF AMERICA)	<u>UNDER SEAL</u>
)	
v.)	CRIMINAL NO. 2:06cr97
)	
DEBORAH DAVIS)	18 U.S.C. § 371
a.k.a. "New York", a.k.a.)	Conspiracy to Make False
"Dee-Dee", a.k.a. "Debra Davis")	Statements to Purchase Firearms
(Counts 1,7,8,19,20,21))	(Count 1)
)	
DIONNE GREENE)	18 U.S.C. §§ 922(a)(6)
a.k.a. "Trinity", a.k.a. "Darryl)	and 924(a)(1)(A)
Thomas", a.k.a. "Trini", a.k.a.)	False Statements to Purchase
"Beliz", a.k.a. "Trinni", a.k.a.)	a Firearm
"Joe Riley", a.k.a. "Dominick)	(Counts 2,4,5,6,7,9,10,11,12,13,14,
Green", a.k.a. "Little T")	16,17,18,19,20,22,23,24,25,26)
(Counts 1,2,3,15))	
)	18 U.S.C. §§ 922(g)(1)
DONNITA MESHELL ANTHONY)	Possession of a Firearm by a
(Counts 1,24))	Convicted Felon
)	(Counts 3,8,15,21)
)	
LEONARD KARL CUFFEE)	18 U.S.C. § 1001(a)(2)
(Counts 1,6,11))	Making a False Statement to a
)	Federal Agent
JOHNNY LYDELL HARRIS)	(Counts 27,28)
a.k.a. "Dale")	
(Counts 1,22,26))	
)	
VALORIE DENISE TAYLOR)	
(Counts 1,25))	
)	
FELICIA VAUGHAN)	
(Counts 1,9,13,16,17))	
)	
MILTON LARRY WADDLER, JR.)	
(Counts 1,5,10))	
)	
NICOLE YOLANDA WILKERSON)	
(Counts 1,18))	

DONALD WILSON
(Counts 1,14,28)

)
)
)
)
)
)
)

FELICIA ANN WOODSON
a.k.a. "Felicia Wilson"
(Counts 1,12,23,27)

JULY 2006 TERM - Norfolk, Virginia

INDICTMENT

INTRODUCTORY ALLEGATIONS

In order to purchase a firearm from a federally licensed firearm dealer (this includes all stores that sell firearms) the purchaser must, by law, accurately fill out ATF Form 4473 Firearm Transaction Record. The purpose of this form is to ensure that the purchaser is not an individual who is prohibited by law from purchasing or possessing a firearm and to ensure that the purchaser is the actual buyer of the firearm and not just a nominee purchaser, or "straw" purchaser, for someone else. Those individuals prohibited from purchasing a firearm include, but are not limited to; convicted felons, fugitives and unlawful users of narcotics. It is a federal felony offense to intentionally misstate facts on ATF Form 4473 Firearm Transaction Record.

In this conspiracy the ringleaders were purchasing numerous firearms in the Tidewater area of Virginia using "straw" purchasers and transporting them to New York, where they were selling the firearms on the streets for a significant profit. Because the ringleaders were convicted felons, they were prohibited from purchasing and possessing a firearm. Additionally, utilizing "straw" purchasers allowed the ringleaders to circumvent the Virginia law limiting purchases of firearms to one gun a month. When the "straw" purchasers filled out ATF Form 4473 Firearm Transaction Record and certified that they were the actual purchasers of the firearms, this statement was untruthful because,

in fact, the ringleaders were the actual purchasers.

COUNT ONE

THE GRAND JURY CHARGES THAT:

From in or about September 16, 2004, up to and including June 23, 2005, within the Eastern District of Virginia, and elsewhere, the defendants herein, DEBORAH DAVIS a.k.a. "New York", a.k.a. "Dee-Dee", a.k.a. "Debra Davis" (hereinafter DEBORAH DAVIS), DIONNE GREENE a.k.a. "Trinity", a.k.a. "Darryl Thomas", a.k.a. "Trini", a.k.a. "Beliz", a.k.a. "Trinni", a.k.a. "Joe Riley", a.k.a. "Dominick Green" (hereinafter DIONNE GREENE), DONNITA MESHELL ANTHONY, LEONARD KARL CUFFEE, JOHNNY LYDELL HARRIS a.k.a. "Dale", VALORIE DENISE TAYLOR, FELICIA VAUGHAN, MILTON LARRY WADDLER, JR., NICOLE YOLANDA WILKERSON, DONALD WILSON and FELICIA ANN WOODSON a.k.a. "Felicia Wilson", did unlawfully and knowingly combine, conspire, confederate and agree with each other and with others, both known and unknown to the grand jury, to commit the following offense against the United States, to wit: To unlawfully and knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, §§ 921-931, to be kept in the records of persons licensed under the provisions of Chapter 44 of Title 18, United States Code, §§ 921-931, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(1)(A).

WAYS, MANNERS AND MEANS OF THE CONSPIRACY

The primary purpose of the conspiracy was to make money through the trafficking of firearms purchased within the Tidewater area of Virginia and transported to New York City, New York for sale on the streets. The ways, manners and means by which the coconspirators carried out the purpose of

the conspiracy include, but are not limited to, the following:

1. It was part of the conspiracy that defendants and unindicted coconspirators would and did play different roles in the conspiracy, taking upon themselves different tasks and participating in the affairs of the conspiracy through various criminal acts. Some of the roles which the defendants and coconspirators assumed and carried out included, among others: financier, organizer, distributor, "straw" purchaser, transporter of firearms, recruiter of nominees, and facilitator.
2. It was a further part of the conspiracy that the conspirators recruited the defendants and other unindicted coconspirators to purchase firearms from federally licensed firearms dealers in their true names and to transfer those firearms to the coconspirators for sale in New York City, New York.
3. It was further part of the conspiracy that the defendants and unindicted coconspirators would purchase firearms and would travel in interstate commerce to facilitate the distribution of firearms.
4. It was further part of the conspiracy that the defendants and unindicted coconspirators would and did derive substantial gross receipts from their unlawful activities.
5. It was further a part of the said conspiracy that the defendants and coconspirators would and did use various methods to further the goals of the conspiracy, insure the conspiracy's continuing success, conceal the existence of the conspiracy and avoid detection by law enforcement agents. Some of these methods included the following: a) using nominees and "straw" purchasers to purchase firearms for the use of this illegal firearms trafficking organization; b) utilizing numerous coconspirators, both indicted and unindicted, to carry out

the business of the conspiracy; c) paying nominees, also known as “straw” purchasers, United States currency for buying firearms for them in the nominees’ true names; d) distributing crack cocaine to some “straw” purchasers and nominees as payment for their services.

OVERT ACTS

In furtherance of the conspiracy and to effect its objects, the following acts, among others, were committed in the Eastern District of Virginia and elsewhere.

1. On or about September 16, 2004, within the Eastern District of Virginia, DIONNE GREENE called an unindicted coconspirator (757-399-4363), utilizing a phone with subscriber name “Dominick Green” (757-277-5854).
2. On or about September 16, 2004, in Norfolk, Virginia, an unindicted coconspirator purchased a firearm, that is, a Taurus, Model PT 111-Pro, 9mm pistol, serial number TVK08476, at Bob’s Gun Shop, at the direction and behest of DIONNE GREENE, who paid the unindicted coconspirator \$50.00 to make this purchase.
3. On or about September 16, 2004, in Norfolk, Virginia, an unindicted coconspirator, signed a range safety rules form, at Bob’s Gun Shop, which is required before utilizing the indoor shooting range.
4. On or about September 16, 2004, in Norfolk, Virginia, DIONNE GREENE, signed a range safety rules form, using the name of an unindicted coconspirator, at Bob’s Gun Shop, which is required before utilizing the indoor shooting range.
5. On or about September 25, 2004, in Portsmouth, Virginia, an unindicted coconspirator purchased a Smith and Wesson, Model SW9VE, 9mm pistol, serial number PBP3405, at D & R Arms, at the direction and behest of DEBORAH DAVIS.

6. On or about October 23, 2004, in Portsmouth, Virginia, an unindicted coconspirator picked up a Smith and Wesson, Model SW9VE, 9mm pistol, serial number PBP3405, at D & R Arms, which he had earlier purchased at the direction and behest of DEBORAH DAVIS.
7. On or about November 3, 2004, in Portsmouth, Virginia, MILTON LARRY WADDLER, JR. purchased a Smith and Wesson, Model SW9VE, 9mm pistol, serial number PBR9929, at D & R Arms, at the direction and behest of DEBORAH DAVIS and DIONNE GREENE, who paid WADDLER \$100.00 to make this purchase.
8. On or about November 3, 2004, in Norfolk, Virginia, LEONARD KARL CUFFEE purchased a Smith and Wesson, Model 908, 9mm pistol, serial number VJL6645, at Bob's Gun Shop, at the direction and behest of DIONNE GREENE who paid CUFFEE \$40.00 in United States currency and \$40.00 in crack cocaine to make this purchase.
9. On or about December 4, 2004, in Portsmouth Virginia, an unindicted coconspirator purchased a Cobray, Model Leinad PM-11, 9mm pistol, serial number 94-0027814, at D & R Arms, at the direction and behest of DEBORAH DAVIS.
10. On or about December 4, 2004, in Portsmouth, Virginia, FELICIA VAUGHAN purchased a Romarm/Cugir, Model WASR, 7.62 X 39, Rifle, serial number 1-55759-03, at D & R Arms, at the direction and behest of a coconspirator.
11. On or about December 5, 2004, in New York City, New York, an unindicted coconspirator sold a Cobray, Model Leinad PM-11, 9mm pistol, serial number 94-0027814 to an undercover officer of the New York City Police Department (hereinafter N.Y.P.D.) in exchange for United States currency.
12. On or about December 5, 2004, in New York City, New York, an unindicted coconspirator

- sold a Romarm/Cugir, Model WASR, 7.62 X 39, Rifle, serial number 1-55759-03 to an undercover officer of the N.Y.P.D. in exchange for United States currency.
13. On or about January 6, 2005, in Portsmouth, Virginia, MILTON LARRY WADDLER, JR. purchased a Taurus, Model PT145 Millennium, .45 caliber pistol, serial number NXG-00553, at D & R Arms, at the direction and behest of DEBORAH DAVIS and DIONNE GREENE.
 14. On or about January 6, 2005, within the Eastern District of Virginia, DIONNE GREENE called D & R Arms (757-483-6948), utilizing a phone with subscriber name "Dominick Green" (757-277-5854).
 15. On or about January 7, 2005, in New York City, New York, DEBORAH DAVIS sold a Taurus, Model PT145 Millennium, .45 caliber pistol, serial number NXG-00553 to an undercover officer of the N.Y.P.D. in exchange for United States currency.
 16. On or about January 22, 2005, in Portsmouth, Virginia, LEONARD KARL CUFFEE purchased a Smith and Wesson, Model SW9VE, 9mm pistol, serial number PBT9624, at D & R Arms, at the direction and behest of DIONNE GREENE.
 17. On or about January 23, 2005, in New York City, New York, DEBORAH DAVIS sold a Smith and Wesson, Model SW9VE, 9mm pistol, serial number PBT9624 to an undercover officer of the N.Y.P.D. in exchange for United States currency.
 18. On or about January 25, 2005, in New York City, New York, an unindicted coconspirator sold approximately nine (9) firearms to an undercover officer of the N.Y.P.D. in exchange for United States currency.
 19. On or about January 31, 2005, within the Eastern District of Virginia, DIONNE GREENE called D & R Arms (757-483-6948), utilizing a phone with subscriber name "Dominick

Green" (757-277-5854).

20. On or about February 1, 2005, in Portsmouth, Virginia, FELICIA ANN WOODSON purchased a Smith and Wesson, Model SW9VE, 9mm pistol, serial number PBT1441, at D & R Arms, at the direction and behest of DIONNE GREENE.
21. On or about February 2, 2005, in New York City, New York, an DEBORAH DAVIS sold a Smith and Wesson, Model SW9VE, 9mm pistol, serial number PBT1441 to an undercover officer of the N.Y.P.D. in exchange for United States currency.
22. On or about February 8, 2005, in Portsmouth, Virginia, FELICIA VAUGHAN purchased a Romarm/Cugir, Model WASR, 7.62 X 39, Rifle, serial number AC-1563-80, at D & R Arms, at the direction and behest of a coconspirator.
23. On or about February 10, 2005, in Norfolk, Virginia, MILTON LARRY WADDLER, JR. purchased a Hi-Point, Model C9, 9mm pistol, serial number P1222144 at Little Creek Pawn, at the direction and behest of a coconspirator.
24. On or about February 12, 2005, in Virginia Beach, Virginia, DONALD WILSON purchased an Arsenal Inc., 7.62 x 39 rifle, serial number EP0148, at the Armory, at the direction and behest of DIONNE GREENE.
25. On or about February 13, 2005, in New York City, New York, DIONNE GREENE and DEBORAH DAVIS sold an Arsenal Inc., 7.62 x 39 rifle, serial number EP0148 to an undercover officer of the N.Y.P.D. in exchange for United States currency.
26. On or about February 13, 2005, in New York City, New York, DIONNE GREENE and DEBORAH DAVIS sold a Hi-Point, Model C9, 9mm pistol, serial number P1222144 to an undercover officer of the N.Y.P.D. in exchange for United States currency.

27. On or about February 13, 2005, in New York City, New York, DIONNE GREENE and DEBORAH DAVIS sold a Romarm/Cugir, Model WASR-10, 7.62 X 39, Rifle, serial number AC-1563-80 to an undercover officer of the N.Y.P.D. in exchange for United States currency.
28. On or about February 15, 2005, in Virginia Beach, Virginia, MILTON LARRY WADDLER, JR. purchased a Century, Model WASR-10, 7.62 X 39, Rifle, serial number AV-1607-83 , at A & P Arms, at the direction and behest of DIONNE GREENE and DEBORAH DAVIS.
29. On or about February 16, 2005, in Chesapeake, Virginia, an individual sold to DIONNE GREENE, a Smith and Wesson, Model 500, .50 caliber revolver, serial number CHF0247 for \$800.00 United States currency.
30. On or about February 17, 2005, in New York City, New York, DIONNE GREENE and DEBORAH DAVIS sold a Romarm/Cugir, Model WASR-10, 7.62 X 39, Rifle, serial number AV-1607-83 to an undercover officer of the N.Y.P.D. in exchange for United States currency.
31. On or about February 18, 2005, in Portsmouth, Virginia, FELICIA VAUGHAN purchased a Kel-Tec, Model Sub 2000, 9mm rifle, serial number E0W10, at D & R Arms, at the direction and behest of a coconspirator.
32. On or about February 19, 2005, in Portsmouth, Virginia, FELICIA VAUGHAN purchased a Romarm/Cugir, Model WASR, 7.62 X 39, Rifle, serial number AN-0446-82, at D & R Arms, at the direction and behest of a coconspirator.
33. On or about February 20, 2005, in New York City, New York, an unindicted coconspirator sold a Smith and Wesson, Model 500, .50 caliber revolver, serial number CHF0247 to an undercover officer of the N.Y.P.D. in exchange for United States currency.
34. On or about February 20, 2005, in New York City, New York, an unindicted coconspirator

- sold a Romarm/Cugir, Model WASR, 7.62 X 39, Rifle, serial number AN-0446-82 to an undercover officer of the N.Y.P.D. in exchange for United States currency.
35. On or about February 25, 2005, in Norfolk, Virginia, NICOLE YOLANDA WILKERSON purchased a Hi-Point, Model JHP 45, .45 caliber pistol, serial number X428293, at American Pawn, at the direction and behest of DEBORAH DAVIS.
 36. On or about February 26, 2005, in Portsmouth, Virginia, an unindicted coconspirator purchased a Smith and Wesson, Model SW9VE, 9mm pistol, serial number PBU6472, at D & R Arms, at the direction and behest of DEBORAH DAVIS.
 37. On or about February 27, 2005, in New York City, New York, DEBORAH DAVIS and DIONNE GREENE sold a Hi-Point, Model JHP 45, .45 caliber pistol, serial number X428293 to an undercover officer of the N.Y.P.D. in exchange for United States currency.
 38. On or about February 27, 2005, in New York City, New York, DEBORAH DAVIS and DIONNE GREENE sold a Smith and Wesson, Model SW9VE, 9mm pistol, serial number PBU6472 to an undercover officer of the N.Y.P.D. in exchange for United States currency.
 39. On or about February 27, 2005, in New York City, New York, DEBORAH DAVIS and DIONNE GREENE sold a Kel-Tec, Model Sub 2000, 9mm rifle, serial number E0W10 to an undercover officer of the N.Y.P.D. in exchange for United States currency.
 40. On or about March 11, 2005, in Portsmouth, Virginia, an unindicted coconspirator purchased three (3) firearms, those are, a Kel-Tec, Model Sub 2000, 9mm rifle, serial number ^E 1181, ^E with a Kel-Tec, Model Sub 2000, 9mm rifle, serial number ^E 1182, and a Kel-Tec, Model Sub 2000, 9mm rifle, serial number ^E 1184, at D & R Arms, at the direction and behest of DEBORAH DAVIS.

41. On or about March 13, 2005, in New York City, New York, DEBORAH DAVIS and DIONNE GREENE sold three (3) firearms, those are, a Kel-Tec, Model Sub 2000, 9mm rifle, serial number ~~7~~^{E WDM}1181, a Kel-Tec, Model Sub 2000, 9mm rifle, serial number ~~7~~^{E WDM}1182, and a Kel-Tec, Model Sub 2000, 9mm rifle, serial number ~~7~~^{E WDM}1184 to an undercover officer of the N.Y.P.D. in exchange for United States currency.
42. On or about March 21, 2005, in Portsmouth, Virginia, an unindicted coconspirator attempted to purchase a firearm, that is, a Smith and Wesson, Model SW9VE, 9mm pistol, serial number PBU7736, at D & R Arms, at the direction and behest of a coconspirator.
43. On or about March 21, 2005, in Virginia Beach, Virginia, JOHNNIE LYDELL HARRIS purchased a Kel-Tec, Model Sub 2000, 9mm rifle, serial number E0Z46, at A & P Arms, at the direction and behest of DEBORAH DAVIS and DIONNE GREENE who paid HARRIS \$20.00 in United States currency to make this purchase.
44. On or about March 21, 2005, VALORIE DENISE TAYLOR, in Chesapeake, Virginia, purchased a hunting license to serve as a second form of identification which is required to purchase a firearm, at the direction and behest of DIONNE GREENE.
45. On or about March 21, 2005, in Virginia Beach, Virginia, VALORIE DENISE TAYLOR purchased a Kel-Tec, Model Sub 2000, 9mm rifle, serial number EOZ47, at A & P Arms, at the direction and behest of DIONNE GREENE.
46. On or about March ~~27~~^{7 WDM}, 2005, DONNITA MESHELL ANTHONY, in Chesapeake, Virginia, purchased a hunting license to serve as a second form of identification which is a requirement to purchase a firearm, at the direction and behest of DIONNE GREENE and DEBORAH DAVIS.

47. On or about March 22, 2005, in Virginia Beach, Virginia, DONNITA MESHELL ANTHONY purchased a Smith and Wesson, Model SW9VE, 9mm pistol, serial number PBU7720, at A & P Arms, at the direction and behest of DEBORAH DAVIS and DIONNE GREENE.
48. On March 22, 2005, in Portsmouth, Virginia, JOHNNY LYDELL HARRIS attempted to purchase a Smith and Wesson, Model SW9VE, 9-mm pistol, serial number PBU7736, at D & R Arms, at the direction and behest of DIONNE GREENE and DEBORAH DAVIS.
49. On or about March 22, 2005, in Virginia Beach, Virginia, FELICIA ANN WOODSON purchased two (2) firearms, those are, a Kel-Tec, Model Sub 2000, .40 caliber rifle, serial number 21264, and a Kel-Tec, Model Sub 2000, .40 caliber rifle, serial number 19438, at A & P Arms, at the direction and behest of DIONNE GREENE.
50. On or about March 22, 2005, in Virginia Beach, Virginia, VALORIE DENISE TAYLOR purchased a Smith and Wesson, Model SW9VE, 9mm pistol, serial number PBV0863, at A & P Arms, at the direction and behest of a DIONNE GREENE.
51. On or about March 25, 2005, in Portsmouth, Virginia, JOHNNIE LYDELL HARRIS purchased a Kel-Tec, Model P11, 9mm pistol, serial number A3253, at D & R Arms, at the direction and behest of DEBORAH DAVIS and DIONNE GREENE who paid HARRIS \$20.00 in United States currency to make this purchase.
52. On or about March 26, 2005, in New York City, New York, DEBORAH DAVIS and DIONNE GREENE sold a Kel-Tec, Model P11, 9mm pistol, serial number A3253 to an undercover officer of the N.Y.P.D. in exchange for United States currency.
53. On or about March 26, 2005, in New York City, New York, DEBORAH DAVIS and DIONNE GREENE sold a Kel-Tec, Model Sub 2000, 9mm rifle, serial number EOZ47 to an

- undercover officer of the N.Y.P.D. in exchange for United States currency.
54. On or about March 26, 2005, in New York City, New York, DEBORAH DAVIS and DIONNE GREENE sold two (2) firearms, those are, a Kel-Tec, Model Sub 2000, .40 caliber rifle, serial number 21264, and a Kel-Tec, Model Sub 2000, .40 caliber rifle, serial number 19438 to an undercover officer of the N.Y.P.D. in exchange for United States currency.
 55. On or about March 26, 2005, in New York City, New York, DEBORAH DAVIS and DIONNE GREENE sold a Kel-Tec, Model Sub 2000, 9mm rifle, serial number E0Z46 to an undercover officer of the N.Y.P.D. in exchange for United States currency.
 56. On or about March 26, 2005, in New York City, New York, DEBORAH DAVIS and DIONNE GREENE sold a Smith and Wesson, Model SW9VE, 9mm pistol, serial number PBV0863 to an undercover officer of the N.Y.P.D. in exchange for United States currency.
 57. On or about June 21, 2005, in Portsmouth, Virginia, FELICIA ANN WOODSON made false statements to federal agents, to conceal the conspiracy and cover up her role.
 58. On or about June 23, 2005, in the Eastern District of Virginia, DONALD WILSON made false statements to federal agents, to conceal the conspiracy and cover up his role.
- (All in violation of Title 18, United States Code, Sections 371 and 2).

COUNT 2

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 16, 2004, at Bob's Gun Shop and 1st National Storage, at 746 Granby Street, Norfolk, Virginia, within the Eastern District of Virginia, DIONNE GREENE, the defendant herein, did aid, abet, counsel, command, induce and procure an unindicted coconspirator to unlawfully and knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code to be kept in the records of Bob's Gun Shop and 1st National Storage, a federally licensed firearms dealer, in that the unindicted coconspirator represented on the Department of the Treasury, Bureau of Alcohol, Tobacco and Firearms Form 4473 that he was the actual buyer of a Taurus, Model PT 111-Pro, 9mm pistol, serial number TVK08476, when, in truth and in fact, DIONNE GREENE was the actual buyer of said firearm.

(In violation of Title 18, United States Code, Sections 922(a)(6) and 924 (a)(1)(A) and Section 2).

COUNT 3

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 16, 2004, within the Eastern District of Virginia, DIONNE GREENE, the defendant herein, having been previously convicted of a felony punishable by imprisonment for a term exceeding one year, did unlawfully and knowingly possess in and affecting commerce a firearm, to wit; a Taurus, Model PT 111-Pro, 9mm pistol, serial number TVK08476, which had been shipped and transported in interstate and foreign commerce.

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

COUNT 4

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 25, 2004, at D & R Arms, at 3008 Tyre Neck Road, Portsmouth, Virginia, within the Eastern District of Virginia, DEBORAH DAVIS, the defendant herein, did aid, abet, counsel, command, induce and procure an unindicted coconspirator to unlawfully and knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code to be kept in the records of D & R Arms, a federally licensed firearms dealer, in that the unindicted coconspirator represented on the Department of the Treasury, Bureau of Alcohol, Tobacco and Firearms Form 4473 that he was the actual buyer of a Smith and Wesson, Model SW9VE, 9mm pistol, serial number PBP3405, when, in truth and in fact, DEBORAH DAVIS was the actual buyer of said firearm.

(In violation of Title 18, United States Code, Sections 922(a)(6) and 924 (a)(1)(A) and Section 2).

COUNT 5

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 3, 2004, at D & R Arms, at 3008 Tyre Neck Road, Portsmouth, Virginia, within the Eastern District of Virginia, MILTON LARRY WADDLER, JR., the defendant herein, did unlawfully and knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code to be kept in the records of D & R Arms, a federally licensed firearms dealer, in that MILTON LARRY WADDLER, JR., represented on the Department of the Treasury, Bureau of Alcohol, Tobacco and Firearms Form 4473 that he was the actual buyer of a Smith and Wesson, Model SW9VE, 9mm pistol, serial number PBR9929, when, in truth and in fact, Deborah Davis and Dionne Greene were the actual buyers of said firearm.

(In violation of Title 18, United States Code, Sections 922(a)(6) and 924 (a)(1)(A) and Section 2).

COUNT 6

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 3, 2004, at Bob's Gun Shop and 1st National Storage, at 746 Granby Street, Norfolk, Virginia, within the Eastern District of Virginia, LEONARD KARL CUFFEE, the defendant herein, did unlawfully and knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code to be kept in the records of Bob's Gun Shop and 1st National Storage, a federally licensed firearms dealer, in that LEONARD KARL CUFFEE, represented on the Department of the Treasury, Bureau of Alcohol, Tobacco and Firearms Form 4473 that he was the actual buyer of a Smith and Wesson, Model 908, 9mm pistol, serial number VJL6645, when, in truth and in fact, Dionne Greene was the actual buyer of said firearm.

(In violation of Title 18, United States Code, Sections 922(a)(6) and 924 (a)(1)(A) and Section 2).

COUNT 7

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 4, 2004, at D & R Arms, at 3008 Tyre Neck Road, Portsmouth, Virginia, within the Eastern District of Virginia, DEBORAH DAVIS, the defendant herein, did aid, abet, counsel, command, induce and procure an unindicted coconspirator to unlawfully and knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code to be kept in the records of D & R Arms, a federally licensed firearms dealer, in that the unindicted coconspirator represented on the Department of the Treasury, Bureau of Alcohol, Tobacco and Firearms Form 4473 that he was the actual buyer of a Cobray, Model Leinad PM-11, 9mm pistol, serial number 94-0027814, when, in truth and in fact, DEBORAH DAVIS was the actual buyer of said firearm.

(In violation of Title 18, United States Code, Sections 922(a)(6) and 924 (a)(1)(A) and Section 2).

COUNT 8

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 4, 2004, within the Eastern District of Virginia, DEBORAH DAVIS, the defendant herein, having been previously convicted of a felony punishable by imprisonment for a term exceeding one year, did unlawfully and knowingly possess in and affecting commerce a Cobray, Model Leinad PM-11, 9mm pistol, serial number 94-0027814, which had been shipped and transported in interstate and foreign commerce.

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

COUNT 9

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 4, 2004, at D & R Arms, at 3008 Tyre Neck Road, Portsmouth, Virginia, within the Eastern District of Virginia, FELICIA VAUGHAN, the defendant herein, did unlawfully and knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code to be kept in the records of D & R Arms, a federally licensed firearms dealer, in that FELICIA VAUGHAN, represented on the Department of the Treasury, Bureau of Alcohol, Tobacco and Firearms Form 4473 that she was the actual buyer of a Romarm/Cugir, Model WASR, 7.62 X 39, Rifle, serial number 1-55759-03, when, in truth and in fact she was not the actual buyer of said firearm.

(In violation of Title 18, United States Code, Sections 922(a)(6) and 924 (a)(1)(A) and Section 2).

COUNT 10

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 6, 2005, at D & R Arms, at 3008 Tyre Neck Road, Portsmouth, Virginia, within the Eastern District of Virginia, MILTON LARRY WADDLER, JR., the defendant herein, did unlawfully and knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code to be kept in the records of D & R Arms, a federally licensed firearms dealer, in that MILTON LARRY WADDLER, JR., represented on the Department of the Treasury, Bureau of Alcohol, Tobacco and Firearms Form 4473 that he was the actual buyer of a Taurus, Model PT145 Millennium, .45 caliber pistol, serial number NXG-00553, when, in truth and in fact, Deborah Davis and Dionne Greene were the actual buyers of said firearm.

(In violation of Title 18, United States Code, Sections 922(a)(6) and 924 (a)(1)(A) and Section 2).

COUNT 11

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 22, 2005, at D & R Arms, at 3008 Tyre Neck Road, Portsmouth, Virginia, within the Eastern District of Virginia, LEONARD KARL CUFFEE, the defendant herein, did unlawfully and knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code to be kept in the records of D & R Arms, a federally licensed firearms dealer, in that LEONARD KARL CUFFEE, represented on the Department of the Treasury, Bureau of Alcohol, Tobacco and Firearms Form 4473 that he was the actual buyer of a Smith and Wesson, Model SW9VE, 9mm pistol, serial number PBT9624, when, in truth and in fact, Dionne Greene was the actual buyer of said firearm.

(In violation of Title 18, United States Code, Sections 922(a)(6) and 924 (a)(1)(A) and Section 2).

COUNT 12

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 1, 2005, at D & R Arms, at 3008 Tyre Neck Road, Portsmouth, Virginia, within the Eastern District of Virginia, FELICIA ANN WOODSON, the defendant herein, did unlawfully and knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code to be kept in the records of D & R Arms, a federally licensed firearms dealer, in that FELICIA ANN WOODSON, represented on the Department of the Treasury, Bureau of Alcohol, Tobacco and Firearms Form 4473 that she was the actual buyer of a Smith and Wesson, Model SW9VE, 9mm pistol, serial number PBT1441, when, in truth and in fact, Dionne Greene was the actual buyer of said firearm.

(In violation of Title 18, United States Code, Sections 922(a)(6) and 924 (a)(1)(A) and Section 2).

COUNT 13

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 8, 2005, at D & R Arms, at 3008 Tyre Neck Road, Portsmouth, Virginia, within the Eastern District of Virginia, FELICIA VAUGHAN, the defendant herein, did unlawfully and knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code to be kept in the records of D & R Arms, a federally licensed firearms dealer, in that FELICIA VAUGHAN, represented on the Department of the Treasury, Bureau of Alcohol, Tobacco and Firearms Form 4473 that she was the actual buyer of a Romarm/Cugir, Model WASR, 7.62 X 39, Rifle, serial number AC-1563-80, when, in truth and in fact she was not the actual buyer of said firearm.

(In violation of Title 18, United States Code, Sections 922(a)(6) and 924 (a)(1)(A) and Section 2).

COUNT 14

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 12, 2005, at American Pawn, at 5313 Indian River Road #114, Virginia Beach, Virginia, within the Eastern District of Virginia, DONALD WILSON, the defendant herein, did unlawfully and knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code to be kept in the records of The Armory, a federally licensed firearms dealer, in that DONALD WILSON, represented on the Department of the Treasury, Bureau of Alcohol, Tobacco and Firearms Form 4473 that he was the actual buyer of an Arsenal Inc., 7.62 x 39 rifle, serial number EP0148, when, in truth and in fact, Dionne Greene was the actual buyer of said firearm.

(In violation of Title 18, United States Code, Sections 922(a)(6) and 924 (a)(1)(A) and Section 2).

COUNT 15

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 16, 2005, within the Eastern District of Virginia, DIONNE GREENE, a.k.a. "Darryl Thomas", the defendant herein, having been previously convicted of a felony punishable by imprisonment for a term exceeding one year, did unlawfully and knowingly possess in and affecting commerce a firearm, to wit; a Smith and Wesson, Model 500, .50 caliber revolver, serial number CHF0247, which had been shipped and transported in interstate and foreign commerce.

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

COUNT 16

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 18, 2005, at D & R Arms, at 3008 Tyre Neck Road, Portsmouth, Virginia, within the Eastern District of Virginia, FELICIA VAUGHAN, the defendant herein, did unlawfully and knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code to be kept in the records of D & R Arms, a federally licensed firearms dealer, in that FELICIA VAUGHAN, represented on the Department of the Treasury, Bureau of Alcohol, Tobacco and Firearms Form 4473 that she was the actual buyer of a Kel-Tec, Model Sub 2000, 9mm rifle, serial number E0W10, when, in truth and in fact she was not the actual buyer of said firearm.

(In violation of Title 18, United States Code, Sections 922(a)(6) and 924 (a)(1)(A) and Section 2).

COUNT 17

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 19, 2005, at D & R Arms, at 3008 Tyre Neck Road, Portsmouth, Virginia, within the Eastern District of Virginia, FELICIA VAUGHAN, the defendant herein, did unlawfully and knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code to be kept in the records of D & R Arms, a federally licensed firearms dealer, in that FELICIA VAUGHAN, represented on the Department of the Treasury, Bureau of Alcohol, Tobacco and Firearms Form 4473 that she was the actual buyer of a Romarm/Cugir, Model WASR, 7.62 X 39, Rifle, serial number AN-0446-82, when, in truth and in fact she was not the actual buyer of said firearm.

(In violation of Title 18, United States Code, Sections 922(a)(6) and 924 (a)(1)(A) and Section 2).

COUNT 18

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 25, 2005, at American Pawn, at 2356 East Little Creek Road, Norfolk, Virginia, within the Eastern District of Virginia, NICOLE YOLANDA WILKERSON, the defendant herein, did unlawfully and knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code to be kept in the records of American Pawn, a federally licensed firearms dealer, in that NICOLE YOLANDA WILKERSON, represented on the Department of the Treasury, Bureau of Alcohol, Tobacco and Firearms Form 4473 that she was the actual buyer of a Hi-Point, Model JHP 45, .45 caliber pistol, serial number X428293, when, in truth and in fact, Deborah Davis was the actual buyer of said firearm.

(In violation of Title 18, United States Code, Sections 922(a)(6) and 924 (a)(1)(A) and Section 2).

COUNT 19

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 26, 2005, at D & R Arms, at 3008 Tyre Neck Road, Portsmouth, Virginia, within the Eastern District of Virginia, DEBORAH DAVIS, the defendant herein, did aid, abet, counsel, command, induce and procure an unindicted coconspirator to unlawfully and knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code to be kept in the records of D & R Arms, a federally licensed firearms dealer, in that the unindicted coconspirator represented on the Department of the Treasury, Bureau of Alcohol, Tobacco and Firearms Form 4473 that he was the actual buyer of a Smith and Wesson, Model SW9VE, 9mm pistol, serial number PBU6472, when, in truth and in fact, DEBORAH DAVIS was the actual buyer of said firearm.

(In violation of Title 18, United States Code, Sections 922(a)(6) and 924 (a)(1)(A) and Section 2).

COUNT 20

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 11, 2005, at D & R Arms, at 3008 Tyre Neck Road, Portsmouth, Virginia, within the Eastern District of Virginia, DEBORAH DAVIS, the defendant herein, did aid, abet, counsel, command, induce and procure an unindicted coconspirator to unlawfully and knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code to be kept in the records of D & R Arms, a federally licensed firearms dealer, in that the unindicted coconspirator represented on the Department of the Treasury, Bureau of Alcohol, Tobacco and Firearms Form 4473 that he was the actual buyer of three (3) firearms, those are, a Kel-Tec, Model Sub 2000, 9mm rifle, serial number ~~F~~^E 1181, a Kel-Tec, Model Sub 2000, 9mm rifle, serial number ~~F~~^E 1182, and a Kel-Tec, Model Sub 2000, 9mm rifle, serial number ~~F~~^E 1184, when, in truth and in fact, DEBORAH DAVIS was the actual buyer of said firearms.

(In violation of Title 18, United States Code, Sections 922(a)(6) and 924 (a)(1)(A) and Section

2).

COUNT 21

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 11, 2005, within the Eastern District of Virginia, DEBORAH DAVIS, the defendant herein, having been previously convicted of a felony punishable by imprisonment for a term exceeding one year, did unlawfully and knowingly possess in and affecting commerce three (3) firearms, to wit; a Kel-Tec, Model Sub 2000, 9mm rifle, serial number ~~1~~^{E WAM}1181, a Kel-Tec, Model Sub 2000, 9mm rifle, serial number ~~1~~^{E WAM}1182, and a Kel-Tec, Model Sub 2000, 9mm rifle, serial number ~~1~~^{E WAM}1184, which had been shipped and transported in interstate and foreign commerce.

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

COUNT 22

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 21, 2005, at A & P Arms, at 2664 Lishelle Place, Virginia Beach, Virginia, within the Eastern District of Virginia, JOHNNIE LYDELL HARRIS, the defendant herein, did unlawfully and knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code to be kept in the records of A & P Arms, a federally licensed firearms dealer, in that JOHNNIE LYDELL HARRIS, represented on the Department of the Treasury, Bureau of Alcohol, Tobacco and Firearms Form 4473 that he was the actual buyer of a Kel-Tec, Model Sub 2000, 9mm rifle, serial number E0Z46 , when, in truth and in fact, Deborah Davis and Dionne Greene were the actual buyers of said firearm.

(In violation of Title 18, United States Code, Sections 922(a)(6) and 924 (a)(1)(A) and Section 2).

COUNT 23

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 22, 2005, at A & P Arms, at 2664 Lishelle Place, Virginia Beach, Virginia, within the Eastern District of Virginia, FELICIA ANN WOODSON, the defendant herein, did unlawfully and knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code to be kept in the records of A & P Arms, a federally licensed firearms dealer, in that FELICIA ANN WOODSON, represented on the Department of the Treasury, Bureau of Alcohol, Tobacco and Firearms Form 4473 that she was the actual buyer of two (2) firearms, a Kel-Tec, Model Sub 2000, .40 caliber rifle, serial number 21264, and a Kel-Tec, Model Sub 2000, .40 caliber rifle, serial number 19438, when, in truth and in fact, she was not the actual buyer of said firearms.

(In violation of Title 18, United States Code, Sections 922(a)(6) and 924 (a)(1)(A) and Section 2).

COUNT 24

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 22 2005, at A & P Arms, at 2664 Lishelle Place, Virginia Beach, Virginia, within the Eastern District of Virginia, DONNITA MESHELL ANTHONY, the defendant herein, did unlawfully and knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code to be kept in the records of A & P Arms, a federally licensed firearms dealer. in that DONNITA MESHELL ANTHONY represented on the Department of the Treasury, Bureau of Alcohol, Tobacco and Firearms Form 4473 that she was the actual buyer of a Smith and Wesson, Model SW9VE, 9mm pistol, serial number PBU7720, when, in truth and in fact, she was not the actual buyer of said firearm.

(In violation of Title 18, United States Code, Sections 922(a)(6) and 924 (a)(1)(A) and Section 2).

COUNT 25

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 22 2005, at A & P Arms, at 2664 Lishelle Place, Virginia Beach, Virginia, within the Eastern District of Virginia, VALORIE DENISE TAYLOR, the defendant herein, did unlawfully and knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code to be kept in the records of A & P Arms, a federally licensed firearms dealer, in that VALORIE DENISE TAYLOR represented on the Department of the Treasury, Bureau of Alcohol, Tobacco and Firearms Form 4473 that she was the actual buyer of a Smith and Wesson, Model SW9VE, 9mm pistol, serial number PBV0863, when, in truth and in fact, she was not the actual buyer of said firearm.

(In violation of Title 18, United States Code, Sections 922(a)(6) and 924 (a)(1)(A) and Section 2).

COUNT 26

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 25, 2005, at D & R Arms, at 3008 Tyre Neck Road, Portsmouth, Virginia, within the Eastern District of Virginia, JOHNNIE LYDELL HARRIS, the defendant herein, did unlawfully and knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code to be kept in the records of D & R Arms, a federally licensed firearms dealer, in that JOHNNIE LYDELL HARRIS, represented on the Department of the Treasury, Bureau of Alcohol, Tobacco and Firearms Form 4473 that he was the actual buyer of a Kel-Tec, Model P11, 9mm pistol, serial number A3253, when, in truth and in fact, he was not the actual buyer of said firearm.

(In violation of Title 18, United States Code, Sections 922(a)(6) and 924 (a)(1)(A) and Section 2).

COUNT 27

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 21, 2005, within the Eastern District of Virginia, FELICIA ANN WOODSON, the defendant herein, in a manner within the jurisdiction of an agency of the executive branch of the United States, to wit: the Bureau of Alcohol, Tobacco and Firearms, an agency of the Department of Justice, did knowingly and willfully make one or more materially false, fictitious and fraudulent statements and representations in that the defendant, FELICIA ANN WOODSON, did falsely, fictitiously, and fraudulently represent the following:

1. FELICIA ANN WOODSON claimed that she had purchased three (3) firearms for the protection of her family and these weapons were stolen, along with her vehicle, three to four months earlier. She stated once her car was stolen, with the guns in the trunk, that she never saw the gun again. When in fact, the guns were purchased at the direction and behest of Dionne Greene, that he immediately took possession of the weapons after she purchased them and that the weapons were not for the protection her family.

(In violation of Title 18, United States Code, Sections 1001 (a)(2) and 2).

COUNT 28

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 23, 2005, within the Eastern District of Virginia, DONALD WILSON, the defendant herein, in a manner within the jurisdiction of an agency of the executive branch of the United States, to wit: the Bureau of Alcohol, Tobacco and Firearms, an agency of the Department of Justice, did knowingly and willfully make one or more materially false, fictitious and fraudulent statements and representations in that the defendant, DONALD WILSON, did falsely, fictitiously, and fraudulently represent the following:

1. During an interview with agents, DONALD WILSON claimed that an Arsenal Inc., 7.62 x 39 rifle, serial number EPO148, that he had purchased was stolen from his residence, when, in fact, the gun was not stolen, he voluntarily left possession of the weapon to Dionne Greene.

(In violation of Title 18, United States Code, Sections 1001 (a)(2) and 2).

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office.

UNITED STATES v. DEBORAH DAVIS, et al.

2. Dec 97

A TRUE BILL:

FOREPERSON

CHUCK ROSENBERG
UNITED STATES ATTORNEY

By: _____

William D. Muhr
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