

- AFFIDAVIT -

I, James M. Grider, hereinafter referred to as affiant, being first duly sworn, depose and make the following statement: Affiant is a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) currently assigned to the Huntsville Satellite Office of the Nashville Division. Affiant has been an ATF Agent for approximately ten and one-half years and has approximately twenty years of law enforcement experience. The affiant's duties as a Special Agent of the ATF include the investigation of specific crimes to include the Unlawful Sale of Firearms by Unlicensed Firearms Dealers, as well as the Falsification of Required ATF Forms Made during the legal Acquisition of Firearms.

As a result of my training and experience as an ATF Special Agent, I am familiar with the Federal criminal laws and know that it is a violation of:

Title 18 U.S.C., § 922(a)(6)—It shall be unlawful for any person in connection with the acquisition or attempted acquisition of any firearm or ammunition from a licensed importer, licensed manufacturer, licensed dealer, or licensed collector, knowingly to make any false statement or fictitious oral or written statement or to furnish or exhibit any false, fictitious, or misrepresented identification, intended or likely to deceive such importer, manufacturer, dealer, or collector with respect to any fact material to the lawfulness of the sale or other disposition of such firearm or ammunition under the provisions of this chapter.

Title 18 U.S.C., § 371—if two or more persons conspire either to commit any offense against the United States, or to defraud the United States, or any agency thereof in any manner or for any purpose, and one or more of such persons do any act to effect the object of the conspiracy.

The facts of this investigation support this affidavit for probable cause that GARY LEE MADISON, alias, DOB: [REDACTED] SSN: [REDACTED]

was involved in a violation of Title 18 U.S.C., § 371 to commit Title 18 U.S.C., § 922(a)(6). This complaint is based upon the following facts:

a. On or about March 21, 2011, Ruffin BLAYLOCK Jr. purchased several firearms at RNB Inc., dba, Larry's Pistol and Pawn, located at 2405 North Memorial Parkway, Huntsville, Alabama, 35810. BLAYLOCK purchased the following firearms:

- One (1) Mfg: Barrett, Mod: 99, Cal: .50 BMG, Type: Rifle, SN: 5768
- One (1) Mfg: Steyr, Mod: HS50, Cal: .50 BMG, Type: Rifle, SN: HS1001589
- One (1) Mfg: Norinco, Mod: SKS, Cal: 7.62 x 39, Type: Rifle, SN: 1700997

Ruffin Wilkerson BLAYLOCK Jr., alias, Ruffin BLAYLOCK, alias, Ruffin Wilkerson, alias, R.W. BLAYLOCK is described as a white male, DOB: [REDACTED], SSN: [REDACTED], last known address: [REDACTED] Northeast, Decatur, Alabama.

b. On or about May 3, 2011, elements of the Mexican Army identified a suspect vehicle in the community of Los Campos, within the municipality of Florencia de Benito Juarez, Zacatecas, Jalisco. The suspect vehicle gave flight, but was ultimately stopped by the Mexican Army. The subsequent investigation located numerous firearms, explosives, tactical gear and a quantity of Marijuana. Open source media accounts released the following description of items seized by the Mexican Army and being investigated by Mexican Attorney General's Office (PGR):

- Five-Hundred (500) Grams of Marijuana
- Two (2) Fragmentation Grenades
- One (1) Firearm [Mfg: Unknown, Type: 40 mm Grenade Launcher]
- Four 40 mm Grenades

- One (1) Firearm [Mfg: Barrett, Mod: 99, Cal: .50 BMG, Type: Rifle, SN: 5768]
- Three (3) AR-15 type rifles in .223 caliber
- One (1) Firearm [Mfg: Colt, Mod: M16, Cal: 5.56, Type: Machine-Gun, SN: 8029726]
- One (1) Firearm [Mfg: Mossberg, Mod: 500A, Cal: 12, Type: Shotgun, SN: R5057789]
- One (1) Firearm [Mfg: Unknown, Mod: 1911, Cal: .38 Super, Type: Pistol, SN:079176]
- Six-Hundred and Fifteen (615) rounds of assorted ammunition.

c. On or about May 20, 2011, Special Agent Jim Grider met with RNB Inc. Manager Jonathan White at Larry's Pistol and Pawn, 2405 North Memorial Parkway, Huntsville, Alabama. White reported he recalled selling the above-described firearms to Ruffin BLAYLOCK Jr. on or about March 21, 2011 at RNB Inc., dba, Larry's Pistol and Pawn.

d. White provided an oral statement, reduced to writing by Your affiant, detailing his recollection of his contact with BLAYLOCK. White reported he was acting as Manager on or about March 21, 2011, when BLAYLOCK greeted White in the show room of Larry's Pistol and Pawn. White advised that BLAYLOCK reminded White that White had personally assisted BLAYLOCK with the purchase of Barrett rifle in .50 BMG caliber previously. White advised he recalled BLAYLOCK having pawned the same firearm back to RNB Inc. at a later date. White reported BLAYLOCK advised he was again in the market for at least one rifle in .50 BMG caliber, reporting he wanted to replace the rifle lost on pawn.

e. White reportedly talked and bargained with BLAYLOCK for approximately one-hour. White advised BLAYLOCK ultimately agreed to purchase two (2) rifles in .50 BMG, as well as an SKS rifle. White recalled he and

BLAYLOCK agreed on a price around approximately nine-thousand and five-hundred dollars (\$9500). BLAYLOCK advised White he would have to go to his car to retrieve his money. BLAYLOCK returned to the showroom a short while later. White reported BLAYLOCK removed a very large wad of cash from his pants pocket. White advised the cash was wrapped in one or several rubber bands, in the denominations of twenty-dollar and one-hundred-dollar bills. White reported he became concerned about the large amount of cash, ~~totally totalling~~ ^{Hand} ~~J.G.~~ approximately nine-thousand and five-hundred dollars. White advised he telephoned the owner, Rob Barnett, advising he was concerned about such a large cash transaction. Rob Barnett reportedly asked White directly if BLAYLOCK had appeared to purposely bargain with intent to structure a payment below ten-thousand dollars. White advised he understood the reporting requirements for suspicious transactions to include transactions of approximately ten-thousand dollar, as well as transactions that were otherwise suspect. White reported he did not believe BLAYLOCK purposely bargained toward a price below ten-thousand dollars, based upon several factors within the parameters of the firearms BLAYLOCK bargained for, to include adding a firearm which initially placed the bargain far over the ten-thousand-dollar threshold. Barnett reportedly advised White to segregate the cash in separate part of the safe, in the event that the sale became questionable within the next several days.

f. White advised he completed the transaction, repeatedly counting the cash out to insure it was a correct amount. White reported witnessing BLAYLOCK's completion of the ATF F 4473 (form). White initiated the NICS query, and received a "Delay" for BLAYLOCK's purchase. White reportedly advised BLAYLOCK of the Delay, requesting a contact telephone number for BLAYLOCK to allow White to call BLAYLOCK. White advised BLAYLOCK provided the telephone number: 256-[REDACTED], which White personally wrote on the top of page 1 of the ATF F 4473, transaction numbers: 8750-1; 6514-3; 6646-16.

g. White viewed a photographic line-up, prepared by Your affiant, to include Ruffin BLAYLOCK Jr. White positively identified photograph #2 as the person known to him as Ruffin BLAYLOCK.

h. White advised BLAYLOCK's purchase was later "proceeded" by the FBI NICS Branch. White reported someone contacted BLAYLOCK and he came back to the store on or about March 22, 2011. White advised he was busy and he instructed Sales Associate Leigh Weaver to complete the sale. Weaver subsequently witnessed BLAYLOCK complete Section C of the ATF F 4473, prior to receiving the firearms in question.

1. On or about May 19, 2011, ATF Regulatory Industry Operations Investigator Alan Rooks inspected the records of Federal Firearms Licensee Mid-City Pawn, Decatur, Alabama. Investigator Rooks identified a purchase of the following four (4) firearms purchased by Ruffin BLAYLOCK Jr. on or about March 31, 2011:

- One (1) Mfg: Ruger, Mod: Mine-14, Cal: 223, Type: Rifle, SN: 186-58723
- One (1) Mfg: Romania, Mod: 10/63, Cal: 7.62x39, Type: Rifle, SN: 1985S-BC1890
- One (1) Mfg: Romania, Mod: 10/63, Cal: 7.62x39, Type: Rifle, SN: 1985BV7492
- One (1) Mfg: Romania, Mod: 10/63, Cal: 7.62x39, Type: Rifle, SN: 1976GV1485

2. Investigator Rooks investigation revealed that BLAYLOCK's purchase was initially "delayed" by the FBI NICS Branch on March 31, 2011 but BLAYLOCK was later "proceeded". BLAYLOCK subsequently received the firearms in question on or about April 1, 2011.
3. On or about this same date, Investigator Rooks located a similar sale from Mid-City Pawn to Gary Lee MADISON. IOI Rooks met with Owner, Bob Lewis, who reported he believed

MADISON and BLAYLOCK owned a security business together. Gary Lee MADISON is described as a black male, DOB: [REDACTED], SSN, [REDACTED], last known address: [REDACTED], Huntsville, Alabama, 35806.

4. Investigator Rooks identified a purchase of the following four (4) firearms by Gary MADISON on the same day as BLAYLOCK:

- Type: Rifle One (1) Mfg: Ruger, Mod: Mine-14, Cal: 223, Type: Rifle, SN: 186-45367
- One (1) Mfg: Romania, Mod: 10/63, Cal: 7.62x39, Type: Rifle, SN: 1967AE0952
- One (1) Mfg: Romania, Mod: 10/63, Cal: 7.62x39, Type: Rifle, SN: 1976GS2135
- One (1) Mfg: Romania, Mod: 10/63, Cal: 7.62x39, Type: Rifle, SN: 1974FE2484

5. On or about June 1, 2011, the Mexican Army located a cache of buried weapons, at an as of yet to be identified location inside the country of Mexico. On or about June 21, 2011, the ATF National Tracing Center identified one of recovered firearms as having been purchased Gary Lee MADISON at RNB Inc., dba, Larry's Pistol and Pawn, Huntsville, Alabama on or about March 21, 2011. The firearm in question is described as follows :

- i. Type: Rifle One (1) Mfg: Sabre Defence Industries, Mod: SR-15, Cal: 223, Type: Rifle, SN: SDI0212

6. The or about June 28, 2011, Your affiant recovered the ATF F 4473 (Form) detailing MADISON's purchase of the above-described firearm on or about March 21, 2011. Special Grider noted MADISON purchased the firearm in question on the same day, March 21, 2011, as Ruffin BLAYLOCK, as described above.

7. On or about November 2, 2011, Your affiant approached Ruffin BLAYLOCK inside the showroom of Larry's Pistol and Pawn. Your affiant identified himself and requested to meet with Ruffin BLAYLOCK outside of the showroom. Ruffin BLAYLOCK agreed to meet and followed Your affiant to the rear of the store. Your affiant advised BLAYLOCK of his Miranda Rights, which Ruffin BLAYLOCK advised he understood and waived in writing.
8. During the interview Ruffin BLAYLOCK admitted to receiving cash from Gary MADISON directly prior to purchasing various firearms on two separate occasions. Ruffin BLAYLOCK reported he delivered the respective firearms to Gary MADISON within twenty-four (24) hours of receipt from the respective licensed firearms dealers. Ruffin BLAYLOCK maintained he believed the firearms would be used to support a pending business venture with Gary MADISON. However, Ruffin BLAYLOCK admitted to personally completing the respective ATF F 4473 (forms) indicating he was purchasing the firearms for himself. Ruffin BLAYLOCK reported he knew prior to the purchases he would be delivering the firearms to Gary MADISON.
9. On or about November 7, 2011, Your affiant telephonically interviewed Ruffin BLAYLOCK. During the interview, Ruffin BLAYLOCK again denied ever having purchased any firearms, other than those previously admitted to, on behalf of Gary MADISON. Your affiant questioned Ruffin BLAYLOCK with respect to a purchase of two (2) HiPoint pistols on or about November 29, 2010 at Mid-City Pawn, Decatur, Alabama. The Firearms in questions were described as:
 - One (1) Firearm, Mfg: HiPoint, Mod: C9, Cal: 9, Type: Pistol, SN: P1517510
 - One (1) Firearm, Mfg: HiPoint, Mod: C9, Cal: 9, Type: Pistol, SN: P1517511

10. On this same date, Your affiant met with Ruffin BLAYLOCK on Redstone Arsenal, Huntsville, Alabama. Ruffin BLAYLOCK admitted he had not been truthful about his purchase of the firearms in question. BLAYLOCK answered questions and provided new information with respect to several aspects of the investigation. Ruffin BLAYLOCK reported that Gary MADISON had approached him during on or about November, 2010. Gary MADISON allegedly requested Ruffin BLAYLOCK purchase firearms for Gary MADISON. Gary MADISON allegedly advised he wanted to purchase two (2) firearms for two (2) Bonding Agents employed by Gary MADISON in the Memphis area. Ruffin BLAYLOCK advised he personally purchased the above-described firearm at Mid-City Pawn, with the intention of purchasing the firearms on Gary MADISON's behalf. Ruffin BLAYLOCK reportedly delivered the two (2) firearms to Gary MADISON after receiving them on or about November 29, 2010. BLAYLOCK reported he had used his own funds for the purchase. BLAYLOCK advised MADISON paid BLAYLOCK the purchase price in cash, upon BLAYLOCK delivering the firearms.

11. On February 1, 2012 ATF Special Agent Adam Nesmith and Special Agent Luke Iversen interviewed Quentin Donta HALL at his residence located at [REDACTED] in Huntsville, Alabama. Special Agent Nesmith informed HALL that agents needed to ask him questions about some firearms he purchased in March 2011. HALL was read and provided with ATF Form 3200.4 (Advice of Rights and Waiver) which he signed agreeing to speak with agents without an attorney present. On or about March 29th, 2011 HALL purchased four (4) Hi Point pistols from Mid City Pawn in Decatur, Alabama. One of these firearms, a Hi Point Model CF380, serial number P1517568, was recovered in a crime in Bucerias, Mexico 98 days after HALL purchased the firearm.

12. Initially HALL tried to claim that all four firearms were stolen from him during a vehicle burglary while on a trip in Hollandale, Mississippi. HALL claimed that he did not file a police report due to his level of intoxication and his concern he may be arrested. HALL

signed ATF form 5000.1 (Affidavit) swearing to agents that statement was true and accurate.

13. After securing his initial statement, agents informed HALL that he was a part of a larger investigation into firearms being trafficked into Mexico. After further conversation HALL informed agents that he wished to change his statement. HALL admitted that all four firearms were purchased for his uncle, Gary Madison. HALL identified Gary Madison from a photograph. HALL stated he and Madison went to Mid City Pawn in Decatur, Alabama and Madison picked out the firearms he wanted HALL to purchase. HALL filled out the paperwork (ATF Form 4473) and paid for the firearms for Madison. HALL stated a few days later he returned to Mid City Pawn and picked up the firearms. HALL advised agents Madison called him a week or two later and had HALL meet him near a Texaco gas station in or near a Publix Shopping Center in Madison, Alabama. HALL said he gave all four firearms to Madison and Madison reimbursed HALL for the money he spent on the firearms. HALL stated Madison was in a rental car that day and almost every time he meets him. HALL claims he did not know Madison was involved in trafficking firearms. HALL claims he received no payment from Madison for acquiring the firearms.
14. HALL provided his cellular phone number as (256) [REDACTED] and provided Madison's cellular phone number as (901) [REDACTED]. HALL stated his last contact with Madison was approximately one week ago.
15. On or about September 26, 2011, ATF Regulatory Industry Operations Investigator Alan Rooks performed targeted inspections of various Federal Firearms Licensees (FFL), in Morgan and Limestone Counties, in an effort to locate suspect transactions involving Ruffin BLAYLOCK Jr. and Gary MADISON. IOI Rooks identified several suspect original ATF F 4473 (forms), while reviewing the records of Precision Defense Systems (PDS), of Athens, Alabama. Your affiant subsequently seized three (3) separate original ATF F 4473 (forms).

20. Upon reviewing the aforementioned recoveries, Your affiant noted the apparent involvement of Desma WILLIS, previously noted to have used the address of Gary MADISON at [REDACTED], [REDACTED], Madison, Alabama, 35758. Desma Depere WILLIS is described as a black female, DOB: [REDACTED], SSN: [REDACTED], last known address: [REDACTED], Madison, Alabama, 35758. Note: Desma WILLIS shares the same place of birth: Hollandale, Mississippi, as Gary MADISON.
21. On or about January 27, 2012, your affiant met with Rob Barnett, the owner of RNB Inc., dba, Larry's Pistol and Pawn, Huntsville, Alabama. Your affiant recovered the original ATF F 4473 depicting the above-described sale to Desma WILLIS on or about March 31, 2011.
22. On February 1, 2012, ATF Special Agents (SA) Julie Miller and Antonio Pittman interviewed Desma Depere WILLIS under rights advisement regarding a firearm she purchased that was recently recovered in Mexico. During this interview, WILLIS admitted purchasing four firearms at the bequest of Gary MADISON, who she identified as her boyfriend of approximately two years. WILLIS also provided a signed, written statement outlining her recollection of these purchases.
23. Between on or about February or March 2011, MADISON asked her to purchase two firearms for him at a pawn shop (later identified as Mid Cities Pawn) in Decatur, Alabama. According to WILLIS, MADISON told her the guns and money were waiting for her at the pawn shop. When WILLIS got there, WILLIS gave her name to the salesman, who had WILLIS complete the paperwork and then gave WILLIS the guns, which had already been paid for. When WILLIS left the pawn shop, MADISON immediately called WILLIS's cell phone, instructing WILLIS to meet MADISON at a gas station on the way out of Decatur. WILLIS met MADISON at the gas station,

transferred the firearms and then left. A couple weeks later, MADISON asked WILLIS to purchase two additional firearms for him, which she did. According to WILLIS, MADISON left a list of guns to purchase and cash under the driver side floor mat in her vehicle. WILLIS reported she went to Larry's Pistol and Pawn and purchased the firearms requested by MADISON, which WILLIS ultimately transferred to MADISON.

24. On February 1, 2012, WILLIS gave consent to search her residence, located at [REDACTED] Madison, Alabama. During a search of this residence, ATF Agents recovered two firearms from an extra bedroom, about which WILLIS denied any knowledge. WILLIS and MADISON shared this storage space. In the garage, Agents recovered three empty gun boxes; "BLAYLOCK" was handwritten on one of these boxes.

25. WILLIS stated she is the sole payer of the monthly payment on this home and pays all utility bills. She denied receiving any money from MADISON, who has access to her home via a key under the front door mat and occasionally stays overnight when he is in town.

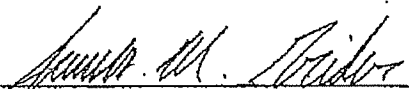
26. On or about February 1, 2012, your affiant recovered numerous ATF F 4473 (forms) from Mid-City Pawn, Decatur, Alabama. WILLIS was delayed on a NICS background check and was later cleared on or about March 28, 2011. According to shop records, WILLIS returned on or about March 29, 2011 to pick up the firearms, which investigation identified as two (2) AR-15 type rifles, purchased by Desma WILLIS as:

- One (1) Mfg: Century, Mod: C-15, Cal: .223, Type: Rifle, SN: JTM04193
- One (1) Mfg: Olympic Arms, Mod: AR-15, Cal: .223, Type: Rifle, SN: KJ7439

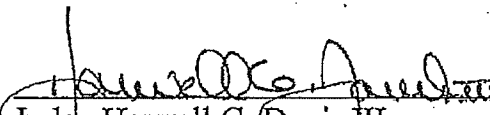
27. On or about February 1, 2012, your affiant noted the two (2) above-described firearms were recovered on or about January 9, 2012 in

Mineral Del Chico, Hidalgo, Mexico as part of the previously described recovery.

Affiant affirms that the aforementioned facts are true and correct to the best of the affiant's knowledge.


Special Agent, James M. Grider
Affiant

Sworn to and Subscribed before me,
this the 2nd day of February, 2012


Judge Harwell G. Davis III
United States Magistrate Judge