

JWV/TMO/LDH: March 2012
GJ#2

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
NORTHEASTERN DIVISION**

UNITED STATES OF AMERICA)
)
 v.)
)
GARY LEE MADISON,)
RUFFIN WILKERSON BLAYLOCK, JR.)
QUENTIN DONTA HALL,)
DESMA DEPERE WILLIS,)
AMANDA DION OSBORN,)
TIMOTHY LYNN OSBORN,)
COURTNEY KENTAE HOBBS, and)
REGGIE ELLISON)

INDICTMENT

COUNTS ONE through THREE: [18 U.S.C. § 922 (a)(6) and 2]

The Grand Jury charges that:

1. On or about the dates below, in Morgan County and Madison County, within the Northern District of Alabama, the defendants,

**GARY LEE MADISON and
RUFFIN WILKERSON BLAYLOCK, JR.,**

aided and abetted by each other, in connection with the acquisition of firearms by BLAYLOCK, as more particularly described below, from a licensed firearms dealer, as more particularly described below, did cause BLAYLOCK to knowingly make a false and fictitious written statement to an employee of said licensed

dealer, which statement was likely to deceive said employee as to a fact material to the lawfulness of such acquisition of the said firearms by BLAYLOCK, in that BLAYLOCK represented that he was the actual buyer of the firearms, when in fact, as BLAYLOCK then well knew, the firearms were purchased on behalf of another person, GARY LEE MADISON, in violation of Title 18, United States Code, Section 922(a)(6) and (2).

2. The allegations contained in paragraph 1, above, are hereby realleged and incorporated by reference for each of the following counts, as though fully set forth therein:

| <u>Count</u> | <u>Date</u> | <u>Firearm</u> | <u>Federally Licensed Firearm Dealer</u> |
|--------------|-------------|---|--|
| ONE | 10/29/10 | two (2) Hi-Point 9mm pistols | Mid-City Pawn, Inc. |
| TWO | 3/21/11 | one (1) Norinco, SKS 7.62 x 39 mm rifle; one (1) Barrett, M99, .50 BMG rifle; and one (1) Styr, HS50, .50 BMG rifle | RNB, Inc., d/b/a Larry's Pistol and Pawn |
| THREE | 3/31/11 | one (1) Ruger, Mini-14, .223 caliber rifle; and three (3) Romania, 10/63/, 7.62 x 39 mm rifles | Mid-City Pawn, Inc. |

COUNT FOUR: [18 U.S.C. § 922 (a)(6) and 2]

The Grand Jury charges that:

On or about the 29th day of March, 2011, in Morgan County, within the

Northern District of Alabama, the defendants,

**GARY LEE MADISON and
QUENTIN DONTA HALL,**

aided and abetted by each other, in connection with the acquisition of firearms by HALL, that is, four (4) Hi Point, CF380, 9mm pistols, from Mid-City Pawn, Inc., a licensed firearms dealer, did cause HALL to knowingly make a false and fictitious written statement to an employee of Mid-City Pawn, Inc., which statement was likely to deceive said employee as to a fact material to the lawfulness of such acquisition of the said firearms by HALL, in that HALL represented that he was the actual buyer of the firearms, when in fact, as HALL then well knew, the firearms were purchased on behalf of another person, GARY LEE MADISON, in violation of Title 18, United States Code, Section 922(a)(6) and (2).

COUNTS FIVE through SIX: [18 U.S.C. § 922 (a)(6) and 2]

The Grand Jury charges that:

1. On or about the dates below, in Morgan County and Madison County, within the Northern District of Alabama, the defendants,

**GARY LEE MADISON and
DESMA DEPERE WILLIS,**

aided and abetted by each other, in connection with the acquisition of firearms by WILLIS, as more particularly described below, from a licensed firearms dealer, as more particularly described below, did cause WILLIS to knowingly make a false

and fictitious written statement to an employee of said licensed dealer, which statement was likely to deceive said employee as to a fact material to the lawfulness of such acquisition of the said firearms by WILLIS, in that WILLIS represented that she was the actual buyer of the firearms, when in fact, as WILLIS then well knew, the firearms were purchased on behalf of another person, GARY LEE MADISON, in violation of Title 18, United States Code, Section 922(a)(6) and (2).

2. The allegations contained in paragraph 1, above, are hereby realleged and incorporated by reference for each of the following counts, as though fully set forth therein:

| <u>Count</u> | <u>Date</u> | <u>Firearm</u> | <u>Federally Licensed Firearm Dealer</u> |
|--------------|-------------|---|--|
| FIVE | 3/25/11 | one (1) Century, C-15 .223 caliber rifle; and one (1) Olympic Arms, AR-15, .223 caliber rifle | Mid-City Pawn, Inc. |
| SIX | 3/31/11 | one (1) Bushmaster, XM15 5.56 x 45 mm rifle; and one (1) Sabre, LGTWGHT, 5.56 x 45 mm rifle | RNB, Inc., d/b/a Larry's Pistol and Pawn |

COUNT SEVEN: [18 U.S.C. § 922 (a)(6) and 2]

The Grand Jury charges that:

On or about the 23rd day of March, 2011, in Limestone County, within the

Northern District of Alabama, the defendants,

**AMANDA DION OSBORN,
TIMOTHY LYNN OSBORN and
REGGIE ELLISON,**

aided and abetted by one another, in connection with the acquisition of firearms by AMANDA DION OSBORN, that is, three (3) Century, AK-47, 7.62 x 39 mm rifles, from PDS, Inc., a licensed firearms dealer, did cause AMANDA DION OSBORN to knowingly make a false and fictitious written statement to an employee of PDS, Inc., which statement was likely to deceive said employee as to a fact material to the lawfulness of such acquisition of the said firearms by AMANDA DION OSBORN, in that AMANDA DION OSBORN represented that she was the actual buyer of the firearms, when in fact, as AMANDA DION OSBORN then well knew, the firearms were purchased on behalf other persons, being TIMOTHY LYNN OSBORN and REGGIE ELLISON, in violation of Title 18, United States Code, Section 922(a)(6) and (2).

COUNT EIGHT: [18 U.S.C. § 922 (a)(6) and 2]

The Grand Jury charges that:

On or about the 31st day of March, 2011, in Limestone County, within the Northern District of Alabama, the defendants,

**COURTNEY KENTAE HOBBS and
REGGIE ELLISON,**

aided and abetted by each other, in connection with the acquisition of firearms by

HOBBS, that is, two (2) Liberty Tactical, LTS15, 5.56 x 45 mm rifles, from PDS, Inc., a licensed firearms dealer, did cause HOBBS to knowingly make a false and fictitious written statement to an employee of PDS, Inc., which statement was likely to deceive said employee as to a fact material to the lawfulness of such acquisition of the said firearms by HOBBS, in that HOBBS represented that he was the actual buyer of the firearms, when in fact, as the defendant then well knew, the firearms were purchased on behalf of another person, REGGIE ELLISON, in violation of Title 18, United States Code, Section 922(a)(6) and (2).

COUNT NINE: [18 U.S.C. § 922 (a)(6)]

The Grand Jury charges that:

On or about the 21st day of March, 2011, in Madison County, within the Northern District of Alabama, the defendant,

GARY LEE MADISON,

in connection with the acquisition of a firearm, that is, one (1) Sabre Defence, SR15, 5.56 x 45 mm rifle, from RNB, Inc., a licensed firearms dealer, knowingly made a false and fictitious written statement to an employee of RNB, Inc., which statement was likely to deceive said employee as to a fact material to the lawfulness of such acquisition of the said firearms by the defendant, in that the defendant represented that he was a resident of [REDACTED], Huntsville,

Alabama, when in fact, as the defendant then well knew, he did not reside at that address, in violation of Title 18, United States Code, Section 922(a)(6).

COUNT TEN: [18 U.S.C. § 922 (a)(6)]

The Grand Jury charges that:

On or about the 31st day of March, 2011, in Morgan County, within the Northern District of Alabama, the defendant,

GARY LEE MADISON,

in connection with the acquisition of firearms, that is, four (4) Romania, 10/63, 7.62 x 39 mm rifle, from Mid-City Pawn, Inc., a licensed firearms dealer, knowingly made a false and fictitious written statement to an employee of Mid-City Pawn, Inc., which statement was likely to deceive said employee as to a fact material to the lawfulness of such acquisition of the said firearms by the defendant, in that the defendant represented that he was a resident of [REDACTED] [REDACTED] Huntsville, Alabama, when in fact, as the defendant then well knew, he did not reside at that address, in violation of Title 18, United States Code, Section 922(a)(6).

COUNT ELEVEN: [18 U.S.C. § 922 (a)(6)]

The Grand Jury charges that:

On or about the 22nd day of April, 2011, in Limestone County, within the

Northern District of Alabama, the defendant,

GARY LEE MADISON,

in connection with the acquisition of a firearm, that is, one (1) Cobb, BA50T, 50BMG rifle, from PDS, Inc., a licensed firearms dealer, knowingly made a false and fictitious written statement to an employee of PDS, Inc., which statement was likely to deceive said employee as to a fact material to the lawfulness of such acquisition of the said firearms by the defendant, in that the defendant represented that he was a resident of [REDACTED], Huntsville, Alabama, when in fact, as the defendant then well knew, he did not reside at that address, in violation of Title 18, United States Code, Section 922(a)(6).

A TRUE BILL

/s/ electronic signature

FOREPERSON OF THE GRAND JURY

JOYCE WHITE VANCE
United States Attorney

/s/ electronic signature
TERENCE M. O'ROURKE
Assistant United States Attorney

/s/ electronic signature
LAURA D. HODGE
Assistant United States Attorney