

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION

UNITED STATES OF AMERICA,)	No. 09-04003-01/16-CR-C-NKL
)	
Plaintiff,)	Count 1: (All Defendants)
)	21 U.S.C. § 846
v.)	NLT 10 years; NMT Life
)	and/or \$4 million
ERIC SHERRON COATS,)	Supervised Release: NLT 5 years
[DOB: 11/28/87])	
KODA ALSHAWN COATS,)	Counts 2-3, 9, 11-12: (E. Coats/
[DOB: 5/30/86])	D. Coats/K. Coats/Burnett/
WILLIAM RICKY BOYD,)	Simmons/Stapleton)
[DOB: 12/27/87])	21 U.S.C. § 841(a) (1)
DEMARCO LARON BURNETT,)	NLT 5 years; NMT 40 years
[DOB: 7/1/84])	and/or \$2 million
TARRON MONTEZ CASON,)	Supervised Release: NLT 4 years
[DOB: 4/10/83])	
CHEVISS CARON DENNY,)	Counts 4-8, 10, 14: (Cason/Jones/
[DOB: 3/5/88])	Burnett/E. Coats/Denny/Kee)
DAJUAN ANTHONY HARRIS,)	21 U.S.C. § 841(a) (1)
[DOB: 4/29/83])	NMT 20 years and/or \$1 million
BRANDON JAMES ISOM,)	Supervised Release: NLT 3 years
[DOB: 10/6/89])	
ROBERT LEE JONES,)	Count 13: (Washington/Coats/Rogers)
[DOB: 8/30/89])	21 U.S.C. § 841(a) (1)
RYAN MONTEZ KEE,)	NLT 10 years; NMT Life
[DOB: 12/23/86])	and/or \$4 million
WILLIAM HAROLD ROGERS,)	Supervised Release: NLT 5 years
[DOB: 12/1/66])	
MICHAEL LEE STAPLETON,)	Counts 15-29: (Jones/E. Coats/Isom/
[DOB: 3/19/86])	Cason/D. Coats/Harris/Denny/Rogers)
DAMETRELL KODA WASHINGTON,)	21 U.S.C. § 843(b)
[DOB: 4/14/81])	NMT 4 years and/or \$250,000
DIONDRE JAMEL COOPER,)	Supervised Release: NLT 2 years
[DOB: 2/25/89])	
ROBERT DARNELL SIMMONS)	Counts 30, 31, 32, 36, 38, 42:
[DOB: 1/5/73])	(Jones/Simmons/Washington/
and)	Harris/Isom)
DONNA C. COATS,)	18 U.S.C. § 922(g) (1)
[DOB: 11/25/69])	NMT 10 years and/or \$250,000
)	Supervised Release: NMT 3 years
Defendants.)	

) **Counts 33, 35, 39:** (Washington/
) E. Coats/Isom)
) 18 U.S.C. § 924(c)
) NLT 5 years and up to life,
) consecutive to 21 U.S.C. §§ 841
) and 846, and/or \$250,000
) Supervised Release: NMT 5 years
)
) **Count 34** (E. Coats)
) 18 U.S.C. § 922(g)(3)
) NMT 10 years and/or \$250,000
) Supervised Release: NMT 3 years
)
) **Count 37** (Harris)
) 18 U.S.C. § 922(j)
) NMT 10 years and/or \$250,000
) Supervised Release: NMT 3 years
)
) **Count 40:** (E. Coats/K. Coats/Boyd/
) Denny/Harris/Isom/Jones/Cooper/
) Simmons)
) 18 U.S.C. § 371
) NMT 5 years and/or \$250,000
) Supervised Release: NMT 3 years
)
) **Count 41:** (Boyd/Isom/Cooper/
) Stapleton/Simmons)
) 18 U.S.C. § 36
) NMT 25 years and/or \$250,000
) Supervised Release: NMT 5 years
)
) **Counts 43, 44, 45:** (Isom/Boyd/
) Cooper)
) 18 U.S.C. § 924(c)
) NLT 10 years and up to life,
) consecutive, and/or \$250,000
) Supervised Release: NMT 5 years
)
) \$100 mandatory penalty assessment,
) each count, each defendant therein

DEFENDANT	COUNTS
Eric Sherron Coats	1, 3, 8, 13, 16-29, 34, 35, 40
Koda Alshawn Coats	1, 2, 40
William Ricky Boyd	1, 40, 41, 44
Demarco Laron Burnett	1, 6, 9
Tarron Montez Cason	1, 4, 20
Cheviss Caron Denny	1, 10, 29, 40
Dajuan Anthony Harris	1, 27, 36, 37, 40
Brandon James Isom	1, 18, 38, 39, 40, 41, 42, 43
Robert Lee Jones	1, 5, 7, 14, 15, 17, 30, 40
Ryan Montez Kee	1, 14
William Harold Rogers	1, 13, 26
Michael Lee Stapleton	1, 12, 41
Dametrell Koda Washington	1, 13, 32, 33
Diondre Jamel Cooper	1, 40, 41, 45
Robert Darnell Simmons	1, 11, 31, 40, 41
Donna C. Coats	1, 3, 21

S U P E R S E D I N G I N D I C T M E N T

THE GRAND JURY CHARGES THAT:

Count 1

(Conspiracy to Distribute Controlled Substances)

1. From an unknown date, but at least as early as in or about January 2007, and continuing until on or about January 29, 2009, in the Western District of Missouri, and elsewhere, ERIC SHERRON COATS, KODA ALSHAWN COATS, WILLIAM RICKY BOYD, DEMARCO LARON BURNETT, TARRON MONTEZ CASON, CHEVISS CARON DENNY, DAJUAN

ANTHONY HARRIS, BRANDON JAMES ISOM, ROBERT LEE JONES, RYAN MONTEZ KEE, WILLIAM HAROLD ROGERS, MICHAEL LEE STAPLETON, DAMETRELL KODA WASHINGTON, DIONDRE JAMEL COOPER, ROBERT DARNELL SIMMONS and DONNA C. COATS, defendants, did intentionally combine, conspire, confederate and agree with other persons, known and unknown to the Grand Jury, to distribute and possess with the intent to distribute more than 50 grams of a mixture and substance containing a detectable amount of cocaine base (crack), a Schedule II controlled substance, cocaine, a Schedule II controlled substance, and marijuana, a Schedule I substance, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846, and punishable under Title 21, United States Code, Section 841(b)(1)(A).

Counts 2-13

(Possession with Intent to Distribute Cocaine Base)

2. On or about the dates set forth below, at or near Columbia, in Boone County, in the Western District of Missouri, the defendant or defendants set forth below as to each count, did knowingly and intentionally possess with the intent to distribute and distribute a mixture and substance containing a detectable amount of cocaine base (crack), a Schedule II controlled substance, as made more particular below:

<u>Count</u>	<u>Date</u>	<u>Defendant (s)</u>	<u>Controlled Substance</u>
2	May 11, 2007	Koda Alshawn Coats	at least 5 grams, cocaine base (crack)
3	December 5, 2007	Eric Sherron Coats Donna C. Coats	at least 5 grams, cocaine base (crack)
4	December 18, 2007	Tarron Montez Cason	cocaine base (crack)
5	February 13, 2008	Robert Lee Jones	cocaine base (crack)
6	February 28, 2008	Demarco Laron Burnett	cocaine base (crack)
7	April 18, 2008	Robert Lee Jones	cocaine base (crack)
8	April 24, 2008	Eric Sherron Coats	cocaine base (crack)
9	May 4, 2008	Demarco Laron Burnett	at least 5 grams, cocaine base (crack)
10	May 12, 2008	Cheviss Caron Denny	cocaine base (crack)
11	July 18, 2008	Robert Darnell Simmons	at least 5 grams, cocaine base (crack)
12	July 18, 2008	Michael Lee Stapleton	at least 5 grams, cocaine base (crack)
13	August 14, 2008	Dametrell Koda Washington Eric Sherron Coats William Harold Rogers	at least 50 grams, cocaine base (crack)

All in violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Sections 841(b)(1)(A) (at least 50 grams); 841(b)(1)(B) (at least 5 grams); 841(b)(1)(C) (unspecified amount).

Count 14

(Possession with Intent To Distribute Cocaine and Marijuana)

3. On or about July 8, 2008, in Boone County, in the Western District of Missouri, ROBERT LEE JONES and RYAN MONTEZ KEE, defendants, did knowingly and intentionally possess with the intent to distribute a controlled substance, that is, a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, and a mixture and substance containing less than 50 kilograms of a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Sections 841(b)(1)(C) (cocaine) and 841(b)(1)(D) (marijuana).

Counts 15-29

(Use of a Communications Facility)

4. On or about the dates set forth below as to each count, at or near Boone County, in the Western District of Missouri, the defendant or defendants set forth below as to each count, did knowingly and intentionally use a communications facility, that is, a telephone, to facilitate the commission of the conspiracy to possess with the intent to distribute a controlled substance, as

charged in Count 1 of this indictment, possess with intent to distribute and distribute a controlled substance, and attempt to possess with intent to distribute and distribute cocaine base (crack) or cocaine, both Schedule II controlled substances, in violation of Title 21, United States Code, Section 843(b), and Title 18, United States Code, Section 2.

<u>Count</u>	<u>Date</u>	<u>Defendant</u>	<u>Phone Number Used</u>
15	February 13, 2008	Robert Lee Jones	573/673-8067
16	April 24, 2008	Eric Sherron Coats	573/673-8819
17	July 18, 2008	Eric Sherron Coats Robert Lee Jones	573/673-8819
18	July 19, 2008	Eric Sherron Coats Brandon James Isom	573/673-8819
19	July 22, 2008	Eric Sherron Coats	573/673-8819
20	July 28, 2008	Eric Sherron Coats Tarron Montez Cason	573/356-3181
21	August 4, 2008	Eric Sherron Coats Donna C. Coats	573/356-3181
22	August 5, 2008	Eric Sherron Coats	573/356-3181
23	August 7 2008	Eric Sherron Coats	573/673-1237
24	August 7 2008	Eric Sherron Coats	573/673-1237
25	August 14, 2008	Eric Sherron Coats	573/673-1237
26	August 14, 2008	Eric Sherron Coats William Harold Rogers	573/673-1237
27	August 15, 2008	Eric Sherron Coats Dajuan Anthony Harris	573/673-1237
28	August 21, 2008	Eric Sherron Coats	573/673-1237

29	August 23 2008	Eric Sherron Coats Cheviss Caron Denny	573/673-1237
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Count 30

(Felon in Possession of a Firearm)

5. On or about April 25, 2008, in Boone County, in the Western District of Missouri, ROBERT LEE JONES, defendant, having been previously convicted of a crime punishable for a term exceeding one year, did knowingly possess in and affecting interstate commerce a firearm, that is, a loaded SKS rifle, serial number 6-1512557.

6. Prior to the possession set forth in ¶ 5, defendant had been convicted of the following crime (felony), punishable for a term exceeding one year, in the court named, and on or about the date stated:

On or about May 29, 2007, in the Circuit Court of Boone County, Columbia, Missouri, the defendant was convicted of felony unlawful use of a weapon in case number 05BACR0297201.

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

Count 31

(Felon in Possession of a Firearm)

7. On or about July 18, 2008, in Boone County, in the Western District of Missouri, ROBERT DARNELL SIMMONS, defendant, having been previously convicted of a crime punishable for a term exceeding one year, did knowingly possess in and affecting

interstate commerce a firearm, that is, a Hi-Point, model CF380, .380 cal., serial number P785809.

8. Prior to the possession set forth in ¶ 7, defendant had been convicted of the following crimes (felonies), punishable for a term exceeding one year, in the courts named, and on or about the dates stated:

On or about September 1, 1998, in the 22nd Judicial Court, San Marcos, Texas, the defendant was convicted of felony possession of a controlled substance (cocaine) in case number 98-0153; and

On or about July 7, 1999, in the United States District Court, Western District of Texas, Austin, Texas the defendant was convicted of felony conspiracy to PWID cocaine in case number A-99-CR-12(1).

All in violation Title 18, United States Code, Sections 922(g)(1) and 924(a)(2) and Section 2.

Count 32

(Felon in Possession of Firearms)

9. On or about August 14, 2008, in Boone County, in the Western District of Missouri, DAMETRELL KODA WASHINGTON, defendant, having been previously convicted of a crime punishable for a term exceeding one year, did knowingly possess in and affecting interstate commerce two firearms, that is, a Ruger, model MKII, .22 cal. long rifle, serial number 225-17452, and a Ruger, 9x19mm, model P85, serial number 300-25635.

10. Prior to the possession set forth in ¶ 9, defendant had been convicted of the following crimes (felonies), punishable for

a term exceeding one year, in the courts named, and on or about the dates stated:

On or about February 26, 2001, in the Circuit Court of Boone County, Columbia, Missouri, the defendant was convicted of felony Possession of a Controlled Substance in case number 00CR164170-01;

On or about December 11, 2001, in the Circuit Court of Randolph County, Moberly, Missouri; the defendant was convicted of felony operating vehicle while revoked in case number 14R050100692-01; and

On or about September 25, 2002, in the Circuit Court of Audrain County, Mexico, Missouri, the defendant was convicted of felony trafficking in drugs (crack cocaine), in case number CR0201-000175F.

All in violation Title 18, United States Code, Sections 922(g) (1) and 924(a) (2) and Section 2.

Count 33

(Possession of a Firearm in Connection with Drug Trafficking)

11. On or about August 14, 2008, in Boone County, in the Western District of Missouri, DAMETRELL KODA WASHINGTON, defendant, did knowingly possess a firearm in furtherance of the offense of conspiracy to possess with the intent to distribute and distribute a controlled substance, namely a mixture and substance containing a detectable amount of cocaine base (crack), and cocaine, each a Schedule II controlled substance, and marijuana, a Schedule I controlled substance, as alleged in Count 1, and possession with intent to distribute a controlled substance, each a felony prosecutable in a Court of the United States; all in

violation of Title 18, United States Code, Section 924(c).

Count 34

(Unlawful User or Addict in Possession of a Firearm)

12. On or about August 14, 2008, in Boone County, in the Western District of Missouri, ERIC SHERRON COATS, defendant, then being an unlawful user of, and addicted to, a controlled substance as defined in 21 U.S.C. § 802, did knowingly possess in and affecting commerce a firearm, namely, a Ruger, 9x19mm, model P85, serial number 300-25635, in violation of Title 18, United States Code, Sections 922(g)(3) and 2, and punishable under Title 18, United States Code, Section 924(a)(2).

Count 35

(Possession of a Firearm in Connection with Drug Trafficking)

13. On or about August 14, 2008, in Boone County, in the Western District of Missouri, ERIC SHERRON COATS, defendant, did knowingly possess a firearm in furtherance of the offense of conspiracy to possess with the intent to distribute and distribute a controlled substance, namely a mixture and substance containing a detectable amount of cocaine base (crack), and cocaine, each a Schedule II controlled substance, and marijuana, a Schedule I controlled substance, as alleged in Count 1, and possession with intent to distribute a controlled substance, as alleged in Count 13, each a felony prosecutable in a Court of the United States; all in violation of Title 18, United States Code, Section 924(c).

Count 36

(Felon in Possession of Firearms)

14. On or about August 29, 2008, in Boone County, in the Western District of Missouri, DAJUAN ANTHONY HARRIS, defendant, having been previously convicted of a crime punishable for a term exceeding one year, did knowingly possess in and affecting interstate commerce two firearms, that is, a Glock, model 19 handgun, serial number HNM7998, and an AK 47/22, .22 long rifle, serial number A774499.

15. Prior to the possession set forth in ¶ 14, defendant had been convicted of the following crimes (felonies), punishable for a term exceeding one year, in the court named, and on or about the date stated:

On or about July 11, 2005, in the Circuit Court of Boone County, Columbia, Missouri, the defendant was convicted of felony Trafficking in Drugs in case number 04CR17056301; and

On or about August 15, 2005, in the Circuit Court of Boone County, Columbia Missouri; the defendant was convicted of felony Possession of a Controlled Substance in case number 05BACR0230801.

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

Count 37

(Possession of a Stolen Firearm)

16. On or about August 29, 2008, in Boone County, in the Western District of Missouri, DAJUAN ANTHONY HARRIS, defendant, knowingly possessed and concealed a stolen firearm, that is, a

Glock, 9mm, model 19 handgun, serial number HNM7998, which had been shipped and transported in interstate and foreign commerce, either before or after it was stolen, knowing or having reasonable cause to believe that the firearm was stolen, in violation of Title 18, United States Code, Sections 922(j) and 924(a)(2).

Count 38

(Felon in Possession of a Firearm)

17. On or about January 29, 2009, and earlier, in Boone County, in the Western District of Missouri, BRANDON JAMES ISOM, defendant, having been previously convicted of a crime punishable for a term exceeding one year, did knowingly possess in and affecting interstate commerce a firearm, that is, a Glock, model 20, 10mm handgun, serial number VF922US.

18. Prior to the possession set forth in ¶ 17, defendant had been convicted of the following crime (felony), punishable for a term exceeding one year, in the court named, and on or about the date stated:

On or about September 15, 2008, in the Circuit Court of Boone County, Columbia, Missouri, the defendant was convicted of felony unlawful use of a weapon in case number 07BA-CR05829.

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

Count 39

(Possession of a Firearm in Connection with Drug Trafficking)

19. On or about January 29, 2009, in Boone County, in the Western District of Missouri, BRANDON JAMES ISOM, defendant, did

knowingly possess a firearm in furtherance of the offense of conspiracy to possess with the intent to distribute and distribute a controlled substance, namely a mixture and substance containing a detectable amount of cocaine base (crack), and cocaine, Schedule II controlled substances, and marijuana, a Schedule I controlled substance, as alleged in Count 1, and possession with intent to distribute controlled substance, each a felony prosecutable in a Court of the United States; all in violation of Title 18, United States Code, Section 924(c).

Count 40
(Conspiracy)

20. The allegations of paragraphs 1 through 19 are realleged and incorporated herein as if fully set forth again.

21. At all times material, ERIC SHERRON COATS, KODA ALSHAWN COATS, WILLIAM RICKY BOYD, CHEVISS CARON DENNY, DAJUAN ANTHONY HARRIS, BRANDON JAMES ISOM, ROBERT LEE JONES, DIONDRE JAMEL COOPER and ROBERT DARNELL SIMMONS, defendants, and other persons, known and unknown to the Grand Jury, were involved in an organization to distribute controlled substances, including but not limited to crack cocaine, cocaine, and marijuana, to individuals at or near Columbia, Boone County, Missouri, and elsewhere.

22. At all times material, ERIC SHERRON COATS, KODA ALSHAWN COATS, WILLIAM RICKY BOYD, CHEVISS CARON DENNY, DAJUAN ANTHONY HARRIS, BRANDON JAMES ISOM, ROBERT LEE JONES, DIONDRE JAMEL COOPER and ROBERT DARNELL SIMMONS, defendants, and other persons, known

and unknown to the Grand Jury, were in competition with other individuals and groups of individuals, in their unlawful business of distributing and manufacturing controlled substances for distribution to individuals at or near Columbia, Boone County, Missouri and elsewhere.

23. From at least as early as in or about January 2007, and continuing through an unknown date, but at least until on or about January 29, 2009, the exact dates being unknown to the Grand Jury, in the Western District of Missouri, and elsewhere, ERIC SHERRON COATS, KODA ALSHAWN COATS, WILLIAM RICKY BOYD, CHEVISS CARON DENNY, DAJUAN ANTHONY HARRIS, BRANDON JAMES ISOM, ROBERT LEE JONES, DIONDRE JAMEL COOPER and ROBERT DARNELL SIMMONS, defendants, and other persons, known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate and agree with each other, and with other persons, known and unknown to the Grand Jury, to commit an offense against the United States, that is,

a) to knowingly possess, and to aid and abet, in and affecting interstate and foreign commerce, the possession of firearms, by prohibited persons including persons having been previously convicted of a crime punishable for a term exceeding one year, in violation of Title 18, United States Code, Section 922(g)(1);

b) in furtherance of a major drug offense, and with the intent to intimidate, injure and maim, to knowingly

and willfully fire a weapon into group of two or more persons, and by such conduct causes grave risk to any human being, in violation of Title 18, United States Code, Sections 36(b)(1) and (2);

c) to knowingly carry and use a firearm, during and in relation to a crime of violence for which he may be prosecuted for in a court of the United States, that is, Title 18, United States Code, Sections 36(b)(1) and (2), in violation of Title 18, United States Code, Section 924(c)(1); and

d) to knowingly possess a firearm, in furtherance of a drug trafficking crime, for which he may be prosecuted for in a court of the United States, that is, Title 21, United States Code, Sections 841(a)(1) and 846, in violation of Title 18, United States Code, Section 924(c)(1).

OBJECT, MANNER AND MEANS OF THE CONSPIRACY

24. It was the object of the conspiracy to use firearms and violence in order to further their unlawful business of distribution of controlled substances, and to intimidate, harass and injure others in order to reduce or limit competition, establish territory, or enforce debts.

25. It was a part of the manner and means of the conspiracy that the conspirators and others at their direction would store and

pass firearms among themselves, and share in their use of the firearms.

26. It was a further part of the conspiracy, that the conspirators and others would shoot firearms at others in order to further, and to promote their unlawful enterprise of distribution of controlled substances.

27. It was a further part of the conspiracy that the conspirators would use firearms to protect themselves, and their controlled substances.

OVERT ACTS

28. In furtherance of this conspiracy, and to effect its aims and objects, there was committed by one or more of the conspirators, known and unknown to the Grand Jury, at locations within in the Western District of Missouri, and elsewhere, at least one of the following overt acts:

A) On or about June 2, 2007, at or near a Break Time gas station, at or near 1000 Smiley Lane, in Columbia, Boone County, Missouri, a handgun was fired, and as a result a person injured.

B) On or about June 13, 2007, at or near Columbia, Boone County, Missouri, a firearm linked to the June 2, 2007 shooting was possessed.

C) On or about November 2008, a stolen firearm was sold.

D) On or about January 1, 2008, at or near a BP gas station, at or near 800 Stadium, in Jefferson City, Cole County, Missouri,

a handgun was fired, and at least one person was injured.

E) On or about April 25, 2008, at a location at or near Boone County, Missouri, a firearm, body armor, and controlled substance paraphernalia were stored.

F) On or about May 31, 2008, at or near a Petro Mart gas station, at or near 3300 Falling Leaf Lane, in Columbia, Boone County, BRANDON JAMES ISOM possessed and shot a firearm from a vehicle.

G) On or about May 31, 2008, at or near a Petro Mart gas station, at or near 3300 Falling Leaf Lane, in Columbia, Boone County, Missouri, and after overt act F, other handguns were fired and at least one person was injured.

H) On or about May 31, 2008, at or near a Petro Mart gas station, at or near 3300 Falling Leaf Lane, in Columbia, Boone County, Missouri, and after overt act G, a car, different than that in overt act F, was driven away carrying several persons and handguns.

I) Between May 31 and June 23, 2008, a firearm used at the May 31, 2008 shooting was passed to another individual.

J) On or about June 23, 2008, at or near Columbia, Boone County, Missouri, a firearm involved in a shooting which occurred on May 31, 2008, was possessed.

K) On or about July 18, 2008, a firearm was hidden under a bush.

L) On or about August 14, 2008, at a location in Columbia, Boone County, Missouri, two firearms were stored, along with narcotics.

M) On or about August 29, 2008, at a location in Columbia, Boone County, Missouri, firearms and controlled substance paraphernalia were stored.

All in violation Title 18, United States Code, Section 371, and punishable under Title 18, United States Code, Sections 371 and 924(o).

Count 41

(Drive By Shooting Violation)

29. On or about May 31, 2008, at or near Columbia, Boone County in the Western District of Missouri, and elsewhere, WILLIAM RICKY BOYD, BRANDON JAMES ISOM, MICHAEL LEE STAPLETON, DIONDRE JAMEL COOPER, and ROBERT DARNELL SIMMONS, defendants, did in furtherance of a major drug offense, and with the intent to intimidate, injure and maim, knowingly and willfully fire a weapon into a group of two or more persons, and by such conduct caused grave risk to any human being, in violation of Title 18 United States Code, Sections 36(b)(1) and (2).

Count 42

(Felon in Possession of a Firearm)

30. On or about May 31, 2008, and earlier, in Boone County, in the Western District of Missouri, BRANDON JAMES ISOM, defendant, having been previously convicted of a crime punishable for a term

exceeding one year, did knowingly possess in and affecting interstate commerce a firearm, that is, a Glock, model 20, 10mm handgun, serial number VF922US.

31. Prior to the possession set forth in ¶ 30, defendant had been convicted of the following crime (felony), punishable for a term exceeding one year, in the court named, and on or about the date stated:

On or about September 15, 2008 , in the Circuit Court of Boone County, Columbia, Missouri, the defendant was convicted of felony unlawful use of a weapon in case number 07BA-CR05829.

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

Count 43

(Use and Carry a Firearm in Relation to a Crime of Violence)

32. On or about May 31, 2008, in Boone County, in the Western District of Missouri, BRANDON JAMES ISOM, defendant, did knowingly carry and use a firearm, during and in relation to a crime of violence for which he may be prosecuted for in a Court of the United States, that is Title 18, United States Code, Sections 36(b)(1) and (2), as charged in Count 41; all in violation of Title 18, United States Code, Section 924(c) and punishable under Title 18, United States Code, Sections 924(c)(1)(A)(iii) and (c)(1)(C)(i).

Count 44

(Use and Carry a Firearm in Relation to a Crime of Violence)

33. On or about May 31, 2008, in Boone County, in the Western District of Missouri, WILLIAM RICKY BOYD, defendant, did knowingly carry and use a firearm, during and in relation to a crime of violence for which he may be prosecuted for in a Court of the United States, that is Title 18, United States Code, Sections 36 (b) (1) and (2), as charged in Count 41; all in violation of Title 18, United States Code, Section 924(c) and punishable under Title 18, United States Code, Section 924(c) (1) (A) (iii).

Count 45

(Use and Carry a Firearm in Relation to a Crime of Violence)

34. On or about May 31, 2008, in Boone County, in the Western District of Missouri, DIONDRE JAMEL COOPER, defendant, did knowingly carry and use a firearm, during and in relation to a crime of violence for which he may be prosecuted for in a Court of the United States, that is Title 18, United States Code, Sections 36 (b) (1) and (2), as charged in Count 41; all in violation of Title 18, United States Code, Section 924(c) and punishable under Title 18, United States Code, Section 924(c) (1) (A) (iii).

A TRUE BILL.

/S/

FOREPERSON OF THE GRAND JURY

/S/

ANTHONY P. GONZALEZ

Assistant United States Attorney
Missouri Bar No. 29922