

- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 01/04/2008

[redacted], date of birth [redacted],
Social Security Account Number [redacted], address [redacted], St.
Louis, Missouri, telephone [redacted], was arrested at her home
(address referenced above). Also present during the arrest was
Inspector [redacted], United States Postal Inspection
Service (USPIS).

[redacted] was arrested at approximately 7:45 a.m and was
transported to the U.S. Marshall Service via USPIS vehicle. SA
[redacted] and Inspector [redacted] provided the transportation.
[redacted] was released to the USMS at approximately 8:05 a.m.

[redacted] was previously contacted (telephonically) on
December 26, 2007 by this writer and agreed to surrender
voluntarily on that date. [redacted] did not comply.

[redacted] was again contacted telephonically on January 2,
2008. [redacted] pretended to be someone else stating "[redacted] doesn't
live here, she lives with [redacted]". This writer recognized
[redacted] voice from prior contacts.

b6
b7C

Investigation on 1/04/08 at St. Louis, Missouri

File # 56C-SL-192017-69 Date dictated n/a

SA [redacted] SA [redacted]
by SA [redacted] :kc [redacted]

USDC-EDMO

CRIMINAL CASE COVER SHEET

SUPPRESSED

Case No. _____

INDICTMENT

Division of Filing

☒ Eastern☐ Southeastern

Place of Offense

the City of St. Louis and

St. Louis County

Matter to be Sealed

☐ Juvenile☐ Not Suppressed

Type of Charge

☐ Petty☐ Misd☒ Felony

Check all Applicable

Defendant Information:

Defendant's Name

BRIAN BLAND

Birthdate

Social Security No.

Related Case Information:

Superseding Indictment/Information? ☐ If yes, original case number: Orig.Ind/Inf#Is this a new defendant in superseding Ind/Inf? ☐Prior Complaint Case #, if any: Comp.# ☐ Is complaint pending or dismissed? ☐

Name of AUSA

Hal Goldsmith

Agency/Agent

Special Agent

Federal Bureau of Investigation

BOND OR DETENTION - \$10,000 unsecured

Victim-Witness Act?

No

Interpreter Needed: Yes ☐ No ☒ Not known at this time ☐ If yes, language and/or dialect ☐b6
b7C

Location Status

Arrest Date: Not in Custody

Currently in Federal Custody ☐ State Custody ☐ Writ required? ☐Currently on Bond ☐ Defendant not in custody ☒

U.S.C. Citations

(Total # of Counts For this Defendant: 2)

Index Key/Code/ Offense Level	Description of Offense Charged	Counts	Penalty Info
42:1973i.F/4	false information in voter registration	1	I nmt 5 yrs. F nmt \$10,000 -- <u>OR BOTH</u> Sup.Rel. nmt 3 yrs. \$100 Special Assessment
42:1973gg-10F/4	defrauding resident of a fair election process	2	I nmt 5 yrs. F nmt \$250,000 -- <u>OR BOTH</u> Sup.Rel. nmt 3 yrs. \$100 Special Assessment

Date: December 20, 2007

Signature: _____

HAL GOLDSMITH #62501

SEARCHED	INDEXED
SERIALIZED	FILED
JAN 23 2008	
FBI - ST. LOUIS	

56C-SL-192017-

70

SUPPRESSED

JS 45 (1/96)

USDC-EDMO
CRIMINAL CASE COVER SHEET

Case No.

INDICTMENT

Division of Filing

☒ Eastern

☐ Southeastern

Place of Offense

the City of St. Louis and

St. Louis County

Matter to be Sealed

☐ Juvenile

☐ Not Suppressed

Type of Charge

☐ Petty

☐ Misd

☒ Felony

Check all Applicable

Defendant Information:

Defendant's Name

BOBBIE JEAN CHEEKS, a/k/a Dorothy Jones and Bobbie Tobert,

Birthdate

Social Security No.

Related Case Information:

Superseding Indictment/Information? ☐ No If yes, original case number: Orig.Ind/Inf#

Is this a new defendant in superseding Ind/Inf? ☐

Prior Complaint Case #, if any: Comp.# n/a Is complaint pending or dismissed? ☐

Name of AUSA

Hal Goldsmith

Agency/Agent

Special Agent

Federal Bureau of Investigation

BOND OR DETENTION -

\$10,000 unsecured

Victim-Witness Act?

No

Interpreter Needed: Yes ☐ No ☒ Not known at this time ☐ If yes, language and/or dialect ☐

Location Status

Arrest Date: Not in Custody

Currently in Federal Custody ☐ State Custody ☐ Writ required? ☐

Currently on Bond ☐ Defendant not in custody ☐

b6
b7c

U.S.C. Citations

(Total # of Counts For this Defendant: 2)

Index Key/Code/ Offense Level	Description of Offense Charged	Count(s)	Penalty Info
42:1973i.F/4	false information in voter registration	3	I nmt 5 yrs. F nmt \$10,000 -- <u>OR BOTH</u> Sup.Rel. nmt 3 yrs. \$100 Special Assessment
42:1973gg-10F/4	defrauding residents of a fair election process	4	I nmt 5 yrs. F nmt \$250,000 -- <u>OR BOTH</u> Sup.Rel. nmt 3 yrs. \$100 Special Assessment

Date: December 20, 2007

Signature:

HAL GOLDSMITH #62501

SUPPRESSED

USDC-EDMO

CRIMINAL CASE COVER SHEET

Case No.

INDICTMENT

Division of Filing

☒ Eastern☐ Southeastern

Place of Offense

the City of St. Louis and

St. Louis County

Matter to be Sealed

☐ Juvenile☐ Not Suppressed

Type of Charge

☐ Petty☐ Misd☒ Felony

Check all Applicable

Defendant Information:

Defendant's Name

CORTEZ COWAN

Birthdate

Social Security No.

Related Case Information:

Superseding Indictment/Information? N/A If yes, original case number: Orig.Ind/Inf#Is this a new defendant in superseding Ind/Inf? ☐Prior Complaint Case #, if any: Comp.# N/A Is complaint pending or dismissed? ☐

Name of AUSA

Hal Goldsmith

Agency/Agent

Special AgentFederal Bureau of Investigation

BOND OR DETENTION - \$10,000 unsecured

Victim-Witness Act?

No

Interpreter Needed: Yes ☐ No ☒ Not known at this time ☐ If yes, language and/or dialect ☐

Location Status

Arrest Date: Not in Custody

Currently in Federal Custody ☐ State Custody ☐ Writ required? YESCurrently on Bond ☐ Defendant not in custody ☐b6
b7C

U.S.C. Citations

(Total # of Counts For this Defendant: 2)

Index Key/Code/ Offense Level	Description of Offense Charged	Count(s)	Penalty Info
42:1973i.F/4	false information in voter registration	5	I nmt 5 yrs. F nmt \$10,000 -- <u>OR BOTH</u> Sup.Rel. nmt 3 yrs. \$100 Special Assessment
42:1973gg-10F/4	defrauding resident of a fair election process	6	I nmt 5 yrs. F nmt \$250,000 -- <u>OR BOTH</u> Sup.Rel. nmt 3 yrs. \$100 Special Assessment

Date: December 20, 2007

Signature:


 HAL GOLDSMITH #62501

USDC-EDMO

SUPPRESSED

CRIMINAL CASE COVER SHEET

Case No.

INDICTMENT

Division of Filing

☒ Eastern☐ Southeastern

Place of Offense

the City of St. Louis and

St. Louis County

Matter to be Sealed

☐ Juvenile☐ Not Suppressed

Type of Charge

☐ Petty☐ Misd☒ Felony

Check all Applicable

Defendant Information:

Defendant's Name

GOLDEN GIBSON

Birthdate

Social Security No.

Related Case Information:

Superseding Indictment/Information? No If yes, original case number: Orig.Ind/Inf#Is this a new defendant in superseding Ind/Inf? ☐Prior Complaint Case #, if any: Comp.# N/A Is complaint pending or dismissed? ☐

Name of AUSA

Hal Goldsmith

Agency/Agent

Special AgentFederal Bureau of Investigation

BOND OR DETENTION - \$10,000 unsecured

Victim-Witness Act? NoInterpreter Needed: Yes ☐ No ☒ Not known at this time ☐ If yes, language and/or dialect ☐b6
b7C

Location Status

Arrest Date: Not in Custody

Currently in Federal Custody ☐ State Custody ☐ Writ required? NoCurrently on Bond ☐ Defendant not in custody ☒

U.S.C. Citations

(Total # of Counts For this Defendant: 2)

Index Key/Code/ Offense Level	Description of Offense Charged	Count(s)	Penalty Info
42:1973i.F/4	false information in voter registration	7	I nmt 5 yrs. F nmt \$10,000 -- <u>OR BOTH</u> Sup.Rel. nmt 3 yrs. \$100 Special Assessment
42:1973gg-10F/4	defrauding resident of a fair election process	8	I nmt 5 yrs. F nmt \$250,000 -- <u>OR BOTH</u> Sup.Rel. nmt 3 yrs. \$100 Special Assessment

Date: December 20, 2007

Signature:


 HAL GOLDSMITH #62501

SUPPRESSED

USDC-EDMO
CRIMINAL CASE COVER SHEET

Case No.

INDICTMENT

Division of Filing

☒ Eastern

☐ Southeastern

Place of Offense

the City of St. Louis and

St. Louis County

Matter to be Sealed

☐ Juvenile

☐ Not Suppressed

Type of Charge

☐ Petty

☐ Misd

☒ Felony

Check all Applicable

Defendant Information:

Defendant's Name

RADONNA MARIE SMITH

Birthdate

Social Security No.

Related Case Information:

Superseding Indictment/Information? ☐ No If yes, original case number: Orig.Ind/Inf#

Is this a new defendant in superseding Ind/Inf? ☐

Prior Complaint Case #, if any: Comp.# n/a Is complaint pending or dismissed? ☐

Name of AUSA

Hal Goldsmith

Agency/Agent

Special Agent

Federal Bureau of Investigation

BOND OR DETENTION - \$10,000 unsecured

Victim-Witness Act?

No

Interpreter Needed: Yes ☐ No ☒ Not known at this time ☐ If yes, language and/or dialect ☐

Location Status

Arrest Date: Not in Custody

Currently in Federal Custody ☐ State Custody ☐ Writ required? ☐

Currently on Bond ☐ Defendant not in custody ☐

b6
b7C

U.S.C. Citations

(Total # of Counts For this Defendant: 2)

Index Key/Code/ Offense Level	Description of Offense Charged	Count(s)	Penalty Info
42:1973i.F/4	false information in voter registration	9	I nmt 5 yrs. F nmt \$10,000 -- <u>OR BOTH</u> Sup.Rel. nmt 3 yrs. \$100 Special Assessment
42:1973gg-10F/4	defrauding resident of a fair election process	10	I nmt 5 yrs. F nmt \$250,000 -- <u>OR BOTH</u> Sup.Rel. nmt 3 yrs. \$100 Special Assessment

Date: December 20, 2007

Signature:

HAL GOLDSMITH #62501

USDC-EDMO

CRIMINAL CASE COVER SHEET

SUPPRESSED

Case No.

INDICTMENT

Division of Filing

☒ Eastern☐ Southeastern

Place of Offense

the City of St. Louis and

St. Louis County

Matter to be Sealed

☐ Juvenile☐ Not Suppressed

Type of Charge

☐ Petty☐ Misd☒ Felony

Check all Applicable

Defendant Information:

Defendant's Name

ANTHONY M. RELIFORD

Birthdate

Social Security No.

Related Case Information:

Superseding Indictment/Information? ☐ No If yes, original case number: Orig.Ind/Inf#Is this a new defendant in superseding Ind/Inf? ☐Prior Complaint Case #, if any: Comp.# N/AIs complaint pending or dismissed? ☐

Name of AUSA

Hal Goldsmith

Agency/Agent

Special AgentFederal Bureau of Investigation

BOND OR DETENTION - \$10,000 unsecured

Victim-Witness Act?

No

Interpreter Needed: Yes ☐ No ☒ Not known at this time ☐ If yes, language and/or dialect ☐

Location Status

Arrest Date: Not in CustodyCurrently in Federal Custody ☐ State Custody ☐ Writ required? ☐Currently on Bond ☐ Defendant not in custody ☐b6
b7c

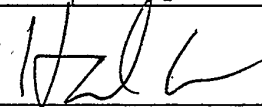
U.S.C. Citations

(Total # of Counts For this Defendant: 2)

Index Key/Code/ Offense Level	Description of Offense Charged	Count(s)	Penalty Info
42:1973i.F/4	false information in voter registration	11	I nmt 5 yrs. F nmt \$10,000. -- <u>OR BOTH</u> Sup.Rel. nmt 3 yrs. \$100 Special Assessment
42:1973gg-10F/4	defrauding resident of a fair election process	12	I nmt 5 yrs. F nmt \$250,000. -- <u>OR BOTH</u> Sup.Rel. nmt 3 yrs. \$100 Special Assessment

Date: December 20, 2007

Signature:


 HAL GOLDSMITH #62501

USDC-EDMO

CRIMINAL CASE COVER SHEET

SUPPRESSED

Case No. .

INDICTMENT

Division of Filing	Place of Offense	Matter to be Sealed	Type of Charge
<input checked="" type="checkbox"/> Eastern	the City of St. Louis and	<input type="checkbox"/> Juvenile	<input type="checkbox"/> Petty
<input type="checkbox"/> Southeastern	St. Louis County	<input type="checkbox"/> Not Suppressed	<input type="checkbox"/> Misd
			<input checked="" type="checkbox"/> Felony
			Check all Applicable

Defendant Information:

Defendant's Name KENNETH DEMOND WILLIAMSBirthdate Social Security No.

Related Case Information:

Superseding Indictment/Information? No If yes, original case number: Orig.Ind/Inf#Is this a new defendant in superseding Ind/Inf? ☐Prior Complaint Case #, if any: Comp.# N/A Is complaint pending or dismissed? ☐Name of AUSA Hal GoldsmithAgency/Agent Special Agent Federal Bureau of Investigation

BOND OR DETENTION - \$10,000 unsecured


Victim-Witness Act? NoInterpreter Needed: Yes ☐ No ☒ Not known at this time ☐ If yes, language and/or dialect ☐Location Status Arrest Date: Not in CustodyCurrently in Federal Custody ☐ State Custody ☐ Writ required? YES - Missouri DOCCurrently on Bond ☐ Defendant not in custody ☐

U.S.C. Citations

(Total # of Counts For this Defendant: 2)

Index Key/Code/ Offense Level	Description of Offense Charged	Count(s)	Penalty Info
42:1973i.F/4	false information in voter registration	13	I nmt 5 yrs.. F nmt \$10,000 -- <u>OR BOTH</u> Sup.Rel. nmt 3 yrs. \$100 Special Assessment
42:1973gg-10F/4	defrauding resident of a fair election process	14	I nmt 5 yrs.. F nmt \$250,000 -- <u>OR BOTH</u> Sup.Rel. nmt 3 yrs. \$100 Special Assessment

Date: December 20, 2007

Signature: HAL GOLDSMITH #62501b6
b7C

USDC-EDMO

CRIMINAL CASE COVER SHEET

SUPPRESSED

Case No.

INDICTMENT

Division of Filing

☒ Eastern☐ Southeastern

Place of Offense

the City of St. Louis and

St. Louis County

Matter to be Sealed

☐ Juvenile☐ Not Suppressed

Type of Charge

☐ Petty☐ Misd☒ Felony

Check all Applicable

Defendant Information:

Defendant's Name

TYAIRA L. WILLIAMS, a/k/a Tootsie Roll

Birthdate

Social Security No.

Related Case Information:

Superseding Indictment/Information? ☐ No If yes, original case number: Orig.Ind/Inf#Is this a new defendant in superseding Ind/Inf? ☐Prior Complaint Case #, if any: Comp.# N/A Is complaint pending or dismissed? ☐

Name of AUSA

Hal Goldsmith

Agency/Agent

Special AgentFederal Bureau of Investigation

BOND OR DETENTION - \$10,000 unsecured

Victim-Witness Act?

No

Interpreter Needed: Yes ☐ No ☒ Not known at this time ☐ If yes, language and/or dialect ☐

Location Status

Arrest Date: Not in CustodyCurrently in Federal Custody ☐ State Custody ☐ Writ required? ☐Currently on Bond ☐ Defendant not in custody ☐b6
b7c

U.S.C. Citations

(Total # of Counts For this Defendant: 2)

Index Key/Code/ Offense Level	Description of Offense Charged	Count(s)	Penalty Info
42:1973i.F/4	false information in voter registration	15	I nmt 5 yrs. F nmt \$10,000 -- <u>OR BOTH</u> Sup.Rel. nmt 3 yrs. \$100 Special Assessment
42:1973gg-10F/4	defrauding resident of a fair election process	16	I nmt 5 yrs. F nmt \$250,000 -- <u>OR BOTH</u> Sup.Rel. nmt 3 yrs. \$100 Special Assessment

Date: December 20, 2007

Signature:


 HAL GOLDSMITH #62501

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRIAN BLAND,
BOBBIE JEAN CHEEKS, a/k/a
Dorothy Jones and Bobbie Tobert,
CORTEZ COWAN,
GOLDEN GIBSON,
RADONNA MARIE SMITH,
ANTHONY M. RELIFORD,
KENNETH DEMOND WILLIAMS,
TYAIRA L. WILLIAMS, a/k/a
Tootsie Roll,

Defendants.

No. _____

INDICTMENT

THE GRAND JURY CHARGES:

A. Introduction

At all times relevant to this Indictment:

1. The Board of Election Commissioners, both for the City of St. Louis, Missouri and for St. Louis County, Missouri, receives and processes voter registration applications submitted for the purpose of registering new voters or, if the voter is already registered, for updating the registration information maintained by the Board.
2. Election registration in the State of Missouri is unitary, that is, a registrant registers once to become simultaneously eligible to vote for federal as well as non-federal candidates.
3. On November 7, 2006, an election was held in Missouri, including in the City of St. Louis and St. Louis County, for the purpose of selecting and electing candidates for federal, state, and local offices. Qualified voters eligible to vote under the laws of the State of Missouri cast ballots for candidates of their preference at this election.

4. In the general election on November 7, 2006, candidates for members of the United States Senate and House of Representatives were on the ballot in the State of Missouri.

5. The Association of Community Organizations for Reform Now (hereinafter referred to as "ACORN") is a not-for-profit organization. During 2006, ACORN maintained and operated an office at 4304 Manchester Avenue in the City of St. Louis, in part to conduct a voter registration drive relative to the November 7, 2006 general election.

6. Project Vote is a not-for-profit organization that works with ACORN to register voters for federal and local elections.

7. ACORN and Project Vote recruited, employed, and directed workers to obtain voter registrations in the City of St. Louis and St. Louis County during 2006. The workers were trained and instructed by ACORN and Project Vote regarding how to obtain voter registrations and how to prepare voter registration applications, which included training and instruction that the actual voter must sign the voter application and that a forged signature is a violation of the law.

8. From in or about July, 2006 through in or about October, 2006, in the City of St. Louis, St. Louis County, in the Eastern District of Missouri, and elsewhere, the defendants, **BRIAN BLAND, BOBBIE JEAN CHEEKS, a/k/a Dorothy Jones and Bobbie Tobert, CORTEZ COWAN, GOLDEN GIBSON, RADONNA MARIE SMITH, ANTHONY M. RELIFORD, KENNETH DEMOND WILLIAMS, and TYAIRA L. WILLIAMS, a/k/a Tootsie Roll**, were employed by ACORN and worked as voter registration recruiters for ACORN, obtaining voter registrations.

COUNT 1

BRIAN BLAND

9. The Grand Jury fully incorporates by reference, as if fully set forth herein, those matters set forth in paragraphs 1 through 8 of this Indictment.

10. From in or about July, 2006 to in or about October, 2006, in the Eastern District of Missouri, the defendant,

BRIAN BLAND,

knowingly and willfully caused to be submitted to the duly appointed Board of Election Commissioners one and more false voter registration applications which falsely stated the addresses, names and other information of the voters being registered, and which were not signed by the purported applicants, including, but not limited to, Missouri Voter Registration Application No. 3218982 in the name of Kenneth Sanders on which the address and name listed were false and the signature thereon was not that of the purported applicant.

All in violation of Title 42, United States Code, Section 1973i(c), and Title 18 United States Code, Section 2.

COUNT 2

BRIAN BLAND

11. The Grand Jury fully incorporates by reference, as if fully set forth herein, those matters set forth in paragraphs 1 through 8 of this Indictment.

12. The qualified voters in the November 7, 2006 election had a right guaranteed by the Equal Protection Clause of the Fourteenth Amendment to the United States Constitution to have the aforesaid election officials count their votes and certify elections based on the number of valid ballots cast in the said election by qualified voters.

13. From in or about July, 2006 through in or about October, 2006, in the Eastern District of Missouri, the defendant,

BRIAN BLAND,

knowingly and willfully deprived and defrauded, and attempted to deprive and defraud, the residents of the City of St. Louis and St. Louis County of the aforesaid right to a fair and impartially conducted election process through submitting to the duly appointed Board of Election Commissioners one and more materially false voter registration applications, including,

but not limited to, Missouri Voter Registration Application No. 3218982 in the name of Kenneth Sanders.

All in violation of Title 42, United States Code, Section 1973gg-10, and Title 18, United States Code, Section 2.

COUNT 3

**BOBBIE JEAN CHEEKS, a/k/a
Dorothy Jones and Bobbie Tobert**

14. The Grand Jury fully incorporates by reference, as if fully set forth herein, those matters set forth in paragraphs 1 through 8 of this Indictment.

15. From in or about July, 2006 to in or about October, 2006, in the Eastern District of Missouri, the defendant,

**BOBBIE JEAN CHEEKS, a/k/a
Dorothy Jones and Bobbie Tobert,**

knowingly and willfully caused to be submitted to the duly appointed Board of Election Commissioners one and more false voter registration applications which falsely stated the addresses, names, and other information of the voters being registered, and which were not signed by the purported applicants, including, but not limited to, Missouri Voter Registration Application No. 3270104 in the name of Howard Payne on which the address and name listed were false and the signature thereon was not that of the purported applicant.

All in violation of Title 42, United States Code, Section 1973i(c), and Title 18 United States Code, Section 2.

COUNT 4

**BOBBIE JEAN CHEEKS, a/k/a
Dorothy Jones and Bobbie Tobert**

16. The Grand Jury fully incorporates by reference, as if fully set forth herein, those matters set forth in paragraphs 1 through 8 of this Indictment.

17. The qualified voters in the November 7, 2006 election had a right guaranteed by the Equal Protection Clause of the Fourteenth Amendment to the United States Constitution to have the aforesaid election officials count their votes and certify elections based on the number of valid ballots cast in the said election by qualified voters.

18. From in or about July, 2006 through in or about October, 2006, in the Eastern District of Missouri, the defendant,

**BOBBIE JEAN CHEEKS, a/k/a
Dorothy Jones and Bobbie Tobert,**

knowingly and willfully deprived and defrauded, and attempted to deprive and defraud, the residents of the City of St. Louis and St. Louis County of the aforesaid right to a fair and impartially conducted election process through submitting to the duly appointed Board of Election Commissioners one and more materially false voter registration applications, including, but not limited to, Missouri Voter Registration Application No. 3270104 in the name of Howard Payne.

All in violation of Title 42, United States Code, Section 1973gg-10, and Title 18, United States Code, Section 2.

COUNT 5

CORTEZ COWAN

19. The Grand Jury fully incorporates by reference, as if fully set forth herein, those matters set forth in paragraphs 1 through 8 of this Indictment.

20. From in or about July, 2006 to in or about October, 2006, in the Eastern District of Missouri, the defendant,

CORTEZ COWAN,

knowingly and willfully caused to be submitted to the duly appointed Board of Election Commissioners one and more false voter registration applications which falsely stated the addresses, names, and other information of the voters being registered, and which were not

signed by the purported applicants, including, but not limited to, Missouri Voter Registration Application No. 3254731 in the name of Shwonte Gent on which the address and name listed were false and the signature thereon was not that of the purported applicant.

All in violation of Title 42, United States Code, Section 1973i(c), and Title 18 United States Code, Section 2.

COUNT 6

CORTEZ COWAN

21. The Grand Jury fully incorporates by reference, as if fully set forth herein, those matters set forth in paragraphs 1 through 8 of this Indictment.

22. The qualified voters in the November 7, 2006 election had a right guaranteed by the Equal Protection Clause of the Fourteenth Amendment to the United States Constitution to have the aforesaid election officials count their votes and certify elections based on the number of valid ballots cast in the said election by qualified voters.

23. From in or about July, 2006 through in or about October, 2006, in the Eastern District of Missouri, the defendant,

CORTEZ COWAN,

knowingly and willfully deprived and defrauded, and attempted to deprive and defraud, the residents of the City of St. Louis and St. Louis County of the aforesaid right to a fair and impartially conducted election process through submitting to the duly appointed Board of Election Commissioners one and more materially false voter registration applications, including, but not limited to, Missouri Voter Registration Application No. 3254731 in the name of Shwonte Gent.

All in violation of Title 42, United States Code, Section 1973gg-10, and Title 18, United States Code, Section 2.

COUNT 7

GOLDEN GIBSON

24.. The Grand Jury fully incorporates by reference, as if fully set forth herein, those matters set forth in paragraphs 1 through 8 of this Indictment.

25. From in or about July, 2006 to in or about October, 2006, in the Eastern District of Missouri, the defendant,

GOLDEN GIBSON,

knowingly and willfully caused to be submitted to the duly appointed Board of Election Commissioners one and more false voter registration applications which falsely stated the addresses, names, and other information of the voters being registered, and which were not signed by the purported applicants, including, but not limited to, Missouri Voter Registration Application No. 3179605 in the name of Brian Dukes on which the address and name listed were false and the signature thereon was not that of the purported applicant.

All in violation of Title 42, United States Code, Section 1973i(c), and Title 18 United States Code, Section 2.

COUNT 8

GOLDEN GIBSON

26. The Grand Jury fully incorporates by reference, as if fully set forth herein, those matters set forth in paragraphs 1 through 8 of this Indictment.

27. The qualified voters in the November 7, 2006 election had a right guaranteed by the Equal Protection Clause of the Fourteenth Amendment to the United States Constitution to have the aforesaid election officials count their votes and certify elections based on the number of valid ballots cast in the said election by qualified voters.

28. From in or about July, 2006 through in or about October, 2006, in the Eastern District of Missouri, the defendant,

GOLDEN GIBSON,

knowingly and willfully deprived and defrauded, and attempted to deprive and defraud, the residents of the City of St. Louis and St. Louis County of the aforesaid right to a fair and

impartially conducted election process through submitting to the duly appointed Board of Election Commissioners one and more materially false voter registration applications, including, but not limited to, Missouri Voter Registration Application No. 3179605 in the name of Brian Dukes.

All in violation of Title 42, United States Code, Section 1973gg-10, and Title 18, United States Code, Section 2.

COUNT 9

RADONNA MARIE SMITH

29. The Grand Jury fully incorporates by reference, as if fully set forth herein, those matters set forth in paragraphs 1 through 8 of this Indictment.

30. From in or about July, 2006 to in or about October, 2006, in the Eastern District of Missouri, the defendant,

RADONNA MARIE SMITH,

knowingly and willfully caused to be submitted to the duly appointed Board of Election Commissioners one and more false voter registration applications which falsely stated the addresses, names, and other information of the voters being registered, and which were not signed by the purported applicants, including, but not limited to, Missouri Voter Registration Application No. 3189659 in the name of Earl Boren on which the address and name listed were false and the signature thereon was not that of the purported applicant.

All in violation of Title 42, United States Code, Section 1973i(c), and Title 18 United States Code, Section 2.

COUNT 10

RADONNA MARIE SMITH

31. The Grand Jury fully incorporates by reference, as if fully set forth herein, those matters set forth in paragraphs 1 through 8 of this Indictment.

32. The qualified voters in the November 7, 2006 election had a right guaranteed by the Equal Protection Clause of the Fourteenth Amendment to the United States Constitution to have the aforesaid election officials count their votes and certify elections based on the number of valid ballots cast in the said election by qualified voters.

33. From in or about July, 2006 through in or about October, 2006, in the Eastern District of Missouri, the defendant,

RADONNA MARIE SMITH,

knowingly and willfully deprived and defrauded, and attempted to deprive and defraud, the residents of the City of St. Louis and St. Louis County of the aforesaid right to a fair and impartially conducted election process through submitting to the duly appointed Board of Election Commissioners one and more materially false voter registration applications, including, but not limited to, Missouri Voter Registration Application No. 3189659 in the name of Earl Boren.

All in violation of Title 42, United States Code, Section 1973gg-10, and Title 18, United States Code, Section 2.

COUNT 11

ANTHONY M. RELIFORD

34. The Grand Jury fully incorporates by reference, as if fully set forth herein, those matters set forth in paragraphs 1 through 8 of this Indictment.

35. From in or about July, 2006 to in or about October, 2006, in the Eastern District of Missouri, the defendant,

ANTHONY M. RELIFORD,

knowingly and willfully caused to be submitted to the duly appointed Board of Election Commissioners one and more false voter registration applications which falsely stated the addresses, names, and other information of the voters being registered, and which were not signed by the purported applicants, including, but not limited to, Missouri Voter Registration

Application No. 3150126 in the name of Shwonte Gent on which the address and name listed were false and the signature thereon was not that of the purported applicant.

All in violation of Title 42, United States Code, Section 1973i(c), and Title 18 United States Code, Section 2.

COUNT 12

ANTHONY M. RELIFORD

36. The Grand Jury fully incorporates by reference, as if fully set forth herein, those matters set forth in paragraphs 1 through 8 of this Indictment.

37. The qualified voters in the November 7, 2006 election had a right guaranteed by the Equal Protection Clause of the Fourteenth Amendment to the United States Constitution to have the aforesaid election officials count their votes and certify elections based on the number of valid ballots cast in the said election by qualified voters.

38. From in or about July, 2006 through in or about October, 2006, in the Eastern District of Missouri, the defendant,

ANTHONY M. RELIFORD,

knowingly and willfully deprived and defrauded, and attempted to deprive and defraud, the residents of the City of St. Louis and St. Louis County of the aforesaid right to a fair and impartially conducted election process through submitting to the duly appointed Board of Election Commissioners one and more materially false voter registration applications, including, but not limited to, Missouri Voter Registration Application No. 3150126 in the name of Shwonte Gent.

All in violation of Title 42, United States Code, Section 1973gg-10, and Title 18, United States Code, Section 2.

COUNT 13

KENNETH DEMOND WILLIAMS

39. The Grand Jury fully incorporates by reference, as if fully set forth herein, those matters set forth in paragraphs 1 through 8 of this Indictment.

40. From in or about July, 2006 to in or about October, 2006, in the Eastern District of Missouri, the defendant,

KENNETH DEMOND WILLIAMS,

knowingly and willfully caused to be submitted to the duly appointed Board of Election Commissioners one and more false voter registration applications which falsely stated the addresses, names, and other information of the voters being registered, and which were not signed by the purported applicants, including, but not limited to, Missouri Voter Registration Application No. 3150213 in the name of Annie Price on which the address and name listed were false and the signature thereon was not that of the purported applicant.

All in violation of Title 42, United States Code, Section 1973i(c), and Title 18 United States Code, Section 2.

COUNT 14

KENNETH DEMOND WILLIAMS

41. The Grand Jury fully incorporates by reference, as if fully set forth herein, those matters set forth in paragraphs 1 through 8 of this Indictment.

42. The qualified voters in the November 7, 2006 election had a right guaranteed by the Equal Protection Clause of the Fourteenth Amendment to the United States Constitution to have the aforesaid election officials count their votes and certify elections based on the number of valid ballots cast in the said election by qualified voters.

43. From in or about July, 2006 through in or about October, 2006, in the Eastern District of Missouri, the defendant,

KENNETH DEMOND WILLIAMS,

knowingly and willfully deprived and defrauded, and attempted to deprive and defraud, the residents of the City of St. Louis and St. Louis County of the aforesaid right to a fair and

impartially conducted election process through submitting to the duly appointed Board of Election Commissioners one and more materially false voter registration applications, including, but not limited to, Missouri Voter Registration Application No. 3150213 in the name of Annie Price.

All in violation of Title 42, United States Code, Section 1973gg-10, and Title 18, United States Code, Section 2.

COUNT 15

**TYAIRA L. WILLIAMS, a/k/a
Tootsie Roll**

44. The Grand Jury fully incorporates by reference, as if fully set forth herein, those matters set forth in paragraphs 1 through 8 of this Indictment.

45. From in or about July, 2006 to in or about October, 2006, in the Eastern District of Missouri, the defendant,

**TYAIRA L. WILLIAMS, a/k/a
Tootsie Roll,**

knowingly and willfully caused to be submitted to the duly appointed Board of Election Commissioners one and more false voter registration applications which falsely stated the addresses, names, and other information of the voters being registered, and which were not signed by the purported applicants, including, but not limited to, Missouri Voter Registration Application No. 3154242 in the name of Minnie Parker on which the address and name listed were false and the signature thereon was not that of the purported applicant.

All in violation of Title 42, United States Code, Section 1973i(c), and Title 18 United States Code, Section 2.

COUNT 16

**TYAIRA L. WILLIAMS, a/k/a
Tootsie Roll**

46. The Grand Jury fully incorporates by reference, as if fully set forth herein, those matters set forth in paragraphs 1 through 8 of this Indictment.

47. The qualified voters in the November 7, 2006 election had a right guaranteed by the Equal Protection Clause of the Fourteenth Amendment to the United States Constitution to have the aforesaid election officials count their votes and certify elections based on the number of valid ballots cast in the said election by qualified voters.

48. From in or about July, 2006 through in or about October, 2006, in the Eastern District of Missouri, the defendant,

**TYAIRA L. WILLIAMS, a/k/a
Tootsie Roll,**

knowingly and willfully deprived and defrauded, and attempted to deprive and defraud, the residents of the City of St. Louis and St. Louis County of the aforesaid right to a fair and impartially conducted election process through submitting to the duly appointed Board of Election Commissioners one and more materially false voter registration applications, including, but not limited to, Missouri Voter Registration Application No. 3154242 in the name of Minnie Parker.

All in violation of Title 42, United States Code, Section 1973gg-10, and Title 18, United States Code, Section 2.

A TRUE BILL

FOREPERSON

CATHERINE L. HANAWAY
United States Attorney

Hal Goldsmith #62501
Assistant United States Attorney

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No.
)	
BRIAN BLAND,)	
BOBBIE JEAN CHEEKS, a/k/a)	
Dorothy Jones and Bobbie Tobert,)	
CORTEZ COWAN,)	
GOLDEN GIBSON,)	
RADONNA MARIE SMITH,)	
ANTHONY M. RELIFORD,)	
KENNETH DEMOND WILLIAMS,)	
TYAIRA L. WILLIAMS, a/k/a)	
Tootsie Roll,)	
)	
Defendants.)	

ORDER

It appearing to the Court that the following Defendants, to wit,

BRIAN BLAND, BOBBIE JEAN CHEEKS a/k/a Dorothy Jones a/k/a Bobbie
Tobert, CORTEZ COWAN, GOLDEN GIBSON, RADONNA MARIE SMITH,
ANTHONY M. RELIFORD, KENNETH DEMOND WILLIAMS, and
TYAIRA L. WILLIAMS a/k/a Tootsie Roll,

have been indicted by the grand jury, and that they have not yet been taken into custody, nor have
they yet given bail for their final appearance to answer said indictment, it is by the Court ordered
that said indictment shall be sealed and suppressed by the Clerk of the Court until the Defendants
are in custody or have given bail for their final appearance.

UNITED STATES DISTRICT JUDGE

Dated this ____ day of December 2007.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION


UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No.
)	
BRIAN BLAND,)	
BOBBIE JEAN CHEEKS, a/k/a)	
Dorothy Jones and Bobbie Tobert,)	
CORTEZ COWAN,)	
GOLDEN GIBSON,)	
RADONNA MARIE SMITH,)	
ANTHONY M. RELIFORD,)	
KENNETH DEMOND WILLIAMS,)	
TYAIRA L. WILLIAMS, a/k/a)	
Tootsie Roll,)	
)	
Defendants.)	

GOVERNMENT'S ENTRY OF APPEARANCE

COME NOW Catherine L. Hanaway, United States Attorney for the Eastern District of Missouri, and Hal Goldsmith, Assistant United States Attorney, and hereby enter their appearance on behalf of the United States.

Respectfully submitted,

CATHERINE L. HANAWAY
United States Attorney



HAL GOLDSMITH #62501
Assistant United States Attorney
111 South 10th Street, Room 20.333
St. Louis, Missouri 63102
(314) 539-2200

United States District Court

EASTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA

WARRANT FOR ARREST

V.

CASE NUMBER:

BRIAN BLAND

To: The United States Marshal
and any Authorized United States Officer

YOU ARE HEREBY COMMANDED to arrest BRIAN BLAND and bring him forthwith to the nearest magistrate to answer an Indictment charging him with:

- Count 1 knowingly and willfully causing one and more voter registration applications which falsely stated information of the voters being registered, and which were not signed by the purported applicants, to be submitted to the Board of Election Commissioners, in violation of Title 42, United States Code, Section 1973i(c), and Title 18 United States Code, Section 2.
- Count 2 knowingly and willfully depriving and defrauding the residents of the City of St. Louis and St. Louis County of the right to a fair and impartial election process by submitting false voter registration applications to the Board of Election Commissioners, in violation of Title 42, United States Code, Section 1973gg-10, and Title 18, United States Code, Section 2.

JAMES G. WOODWARD

Name of Issuing Officer

Clerk, United States District Court

Title of Issuing Officer

Signature of Issuing Officer

December 20, 2007, St. Louis, Missouri

Date and Location

(By) Deputy Clerk

Bond: \$10,000 unsecured recommended by U.S. Attorney

by

Name of Judicial Officer

RETURN

This warrant was received and executed with the arrest of the above-named defendant at

DATE RECEIVED	NAME AND TITLE OF ARRESTING OFFICER	SIGNATURE OF ARRESTING OFFICER
DATE OF ARREST		

United States District Court

EASTERN

DISTRICT OF

MISSOURI

UNITED STATES OF AMERICA

WARRANT FOR ARREST

V.

CASE NUMBER:

BOBBIE JEAN CHEEKS, a/k/a
Dorothy Jones and Bobbie Tobert

To: The United States Marshal
and any Authorized United States Officer

YOU ARE HEREBY COMMANDED to arrest BOBBIE JEAN CHEEKS, a/k/a Dorothy Jones and Bobbie Tobert, and bring her forthwith to the nearest magistrate to answer an Indictment charging him with:

- Count 3 knowingly and willfully causing one and more voter registration applications which falsely stated information of the voters being registered, and which were not signed by the purported applicants, to be submitted to the Board of Election Commissioners, in violation of Title 42, United States Code, Section 1973i(c), and Title 18 United States Code, Section 2.
- Count 4 knowingly and willfully depriving and defrauding the residents of the City of St. Louis and St. Louis County of the right to a fair and impartial election process by submitting false voter registration applications to the Board of Election Commissioners, in violation of Title 42, United States Code, Section 1973gg-10, and Title 18, United States Code, Section 2.

JAMES G. WOODWARD

Name of Issuing Officer

Clerk, United States District Court

Title of Issuing Officer

Signature of Issuing Officer

December 20, 2007, St. Louis, Missouri

Date and Location

(By) Deputy Clerk

Bond: \$10,000 unsecured recommended by U.S. Attorney

by

Name of Judicial Officer

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DATE OF ARREST		

United States District Court

EASTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA

WARRANT FOR ARREST

V.

CASE NUMBER:

CORTEZ COWAN

To: The United States Marshal
and any Authorized United States Officer

YOU ARE HEREBY COMMANDED to arrest CORTEZ COWAN, and bring him forthwith to the nearest magistrate to answer an Indictment charging him with:

Count 1 (odd) knowingly and willfully causing one and more voter registration applications which falsely stated information of the voters being registered, and which were not signed by the purported applicants, to be submitted to the Board of Election Commissioners, in violation of Title 42, United States Code, Section 1973i(c), and Title 18 United States Code, Section 2.

Count 2 (even) knowingly and willfully depriving and defrauding the residents of the City of St. Louis and St. Louis County of the right to a fair and impartial election process by submitting false voter registration applications to the Board of Election Commissioners, in violation of Title 42, United States Code, Section 1973gg-10, and Title 18, United States Code, Section 2.

JAMES G. WOODWARD

Name of Issuing Officer

Clerk, United States District Court

Title of Issuing Officer

Signature of Issuing Officer

December 20, 2007, St. Louis, Missouri

Date and Location

(By) Deputy Clerk

Bond: \$10,000 unsecured recommended by U.S. Attorney

by

Name of Judicial Officer

RETURN

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DATE RECEIVED

NAME AND TITLE OF ARRESTING OFFICER

SIGNATURE OF ARRESTING OFFICER

DATE OF ARREST

United States District Court

EASTERN

DISTRICT OF

MISSOURI

UNITED STATES OF AMERICA

WARRANT FOR ARREST

V.

CASE NUMBER:

GOLDEN GIBSON

To: The United States Marshal
and any Authorized United States Officer

YOU ARE HEREBY COMMANDED to arrest GOLDEN GIBSON and bring the defendant forthwith to the nearest magistrate to answer an Indictment charging the defendant with:

Count 7 knowingly and willfully causing one and more voter registration applications which falsely stated information of the voters being registered, and which were not signed by the purported applicants, to be submitted to the Board of Election Commissioners, in violation of Title 42, United States Code, Section 1973i(c), and Title 18 United States Code, Section 2.

Count 8 knowingly and willfully depriving and defrauding the residents of the City of St. Louis and St. Louis County of the right to a fair and impartial election process by submitting false voter registration applications to the Board of Election Commissioners, in violation of Title 42, United States Code, Section 1973gg-10, and Title 18, United States Code, Section 2.

JAMES G. WOODWARD

Name of Issuing Officer

Clerk, United States District Court

Title of Issuing Officer

Signature of Issuing Officer

December 20, 2007, St. Louis, Missouri

Date and Location

(By) Deputy Clerk

Bond: \$10,000 unsecured recommended by U.S. Attorney

by

Name of Judicial Officer

RETURN

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DATE OF ARREST		

United States District Court

EASTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA

WARRANT FOR ARREST

V.

CASE NUMBER:

RADONNA MARIE SMITH

To: The United States Marshal
and any Authorized United States Officer

YOU ARE HEREBY COMMANDED to arrest RADONNA MARIE SMITH and bring her forthwith to the nearest magistrate to answer an Indictment charging her with:

Count 9 knowingly and willfully causing one and more voter registration applications which falsely stated information of the voters being registered, and which were not signed by the purported applicants, to be submitted to the Board of Election Commissioners, in violation of Title 42, United States Code, Section 1973i(c), and Title 18 United States Code, Section 2.

Count 10 knowingly and willfully depriving and defrauding the residents of the City of St. Louis and St. Louis County of the right to a fair and impartial election process by submitting false voter registration applications to the Board of Election Commissioners, in violation of Title 42, United States Code, Section 1973gg-10, and Title 18, United States Code, Section 2.

JAMES G. WOODWARD

Name of Issuing Officer

Clerk, United States District Court

Title of Issuing Officer

Signature of Issuing Officer

December 20, 2007, St. Louis, Missouri

Date and Location

(By) Deputy Clerk

Bond: \$10,000 unsecured recommended by U.S. Attorney

by

Name of Judicial Officer

RETURN

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DATE RECEIVED	NAME AND TITLE OF ARRESTING OFFICER	SIGNATURE OF ARRESTING OFFICER
DATE OF ARREST		

United States District Court

EASTERN

DISTRICT OF

MISSOURI

UNITED STATES OF AMERICA

WARRANT FOR ARREST

V.

CASE NUMBER:

ANTHONY M. RELIFORD

To: The United States Marshal
and any Authorized United States Officer

YOU ARE HEREBY COMMANDED to arrest ANTHONY M. RELIFORD and bring him forthwith to the nearest magistrate to answer an Indictment charging him with:

- Count 11 knowingly and willfully causing one and more voter registration applications which falsely stated information of the voters being registered, and which were not signed by the purported applicants, to be submitted to the Board of Election Commissioners, in violation of Title 42, United States Code, Section 1973i(c), and Title 18 United States Code, Section 2.
- Count 12 knowingly and willfully depriving and defrauding the residents of the City of St. Louis and St. Louis County of the right to a fair and impartial election process by submitting false voter registration applications to the Board of Election Commissioners, in violation of Title 42, United States Code, Section 1973gg-10, and Title 18, United States Code, Section 2.

JAMES G. WOODWARD

Name of Issuing Officer

Clerk, United States District Court

Title of Issuing Officer

Signature of Issuing Officer

December 20, 2007, St. Louis, Missouri

Date and Location

(By) Deputy Clerk

Bond: \$10,000 unsecured recommended by U.S. Attorney

by

Name of Judicial Officer

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DATE RECEIVED	NAME AND TITLE OF ARRESTING OFFICER	SIGNATURE OF ARRESTING OFFICER
DATE OF ARREST		

United States District Court

EASTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA

WARRANT FOR ARREST

V.

CASE NUMBER:

KENNETH DEMOND WILLIAMS

To: The United States Marshal
and any Authorized United States Officer

YOU ARE HEREBY COMMANDED to arrest KENNETH DEMOND WILLIAMS and bring him forthwith to the nearest magistrate to answer an Indictment charging him with:

- Count 13 knowingly and willfully causing one and more voter registration applications which falsely stated information of the voters being registered, and which were not signed by the purported applicants, to be submitted to the Board of Election Commissioners, in violation of Title 42, United States Code, Section 1973i(c), and Title 18 United States Code, Section 2.
- Count 14 knowingly and willfully depriving and defrauding the residents of the City of St. Louis and St. Louis County of the right to a fair and impartial election process by submitting false voter registration applications to the Board of Election Commissioners, in violation of Title 42, United States Code, Section 1973gg-10, and Title 18, United States Code, Section 2.

JAMES G. WOODWARD

Name of Issuing Officer

Clerk, United States District Court

Title of Issuing Officer

Signature of Issuing Officer

December 20, 2007, St. Louis, Missouri

Date and Location

(By) Deputy Clerk

Bond: \$10,000 unsecured recommended by U.S. Attorney

by

Name of Judicial Officer

RETURN

This warrant was received and executed with the arrest of the above-named defendant at _____

DATE RECEIVED	NAME AND TITLE OF ARRESTING OFFICER	SIGNATURE OF ARRESTING OFFICER
DATE OF ARREST		

United States District Court

EASTERN

DISTRICT OF

MISSOURI

UNITED STATES OF AMERICA

WARRANT FOR ARREST

V.

CASE NUMBER:

TYAIRA L. WILLIAMS
a/k/a Tootsie Roll

To: The United States Marshal
and any Authorized United States Officer

YOU ARE HEREBY COMMANDED to arrest TYAIRA L. WILLIAMS, a/k/a Tootsie Roll and bring her forthwith to the nearest magistrate to answer an Indictment charging her with:

- Count 15 knowingly and willfully causing one and more voter registration applications which falsely stated information of the voters being registered, and which were not signed by the purported applicants, to be submitted to the Board of Election Commissioners, in violation of Title 42, United States Code, Section 1973i(c), and Title 18 United States Code, Section 2.
- Count 16 knowingly and willfully depriving and defrauding the residents of the City of St. Louis and St. Louis County of the right to a fair and impartial election process by submitting false voter registration applications to the Board of Election Commissioners, in violation of Title 42, United States Code, Section 1973gg-10, and Title 18, United States Code, Section 2.

JAMES G. WOODWARD
Name of Issuing Officer

Clerk, United States District Court
Title of Issuing Officer

Signature of Issuing Officer

December 20, 2007, St. Louis, Missouri
Date and Location

(By) Deputy Clerk

Bond: \$10,000 unsecured recommended by U.S. Attorney

by

Name of Judicial Officer

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DATE OF ARREST		

FEDERAL BUREAU OF INVESTIGATION
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Page 1 ~ b6, b7C

Page 2 ~ b6, b7C

Page 3 ~ b6, b7C

Page 4 ~ b6, b7C

Page 5 ~ b6, b7C

Page 6 ~ b6, b7C

Page 7 ~ b6, b7C