

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

UNITED STATES OF AMERICA,)	No. _____
)	
Plaintiff,)	COUNT ONE: All Defendants
)	21 U.S.C. §§ 841(a)(1) and (b)(1)(B) and 846
v.)	NLT 5 Years and NMT 40 Years Imprisonment
)	NMT \$2,000,000 Fine
KEVION DARNELL BIFFORD,)	NLT 4 Years Supervised Release
a/k/a "Two Gun Kevi")	Class B Felony
[DOB: 06/07/1986])	
)	COUNT TWO: Defendants Bifford, Williams,
PRINCE EARL CLARENCE GILBERT, JR.))	Jackson and Smith
[DOB: 07/20/1986])	21 U.S.C. §§ 841(a)(1) and (b)(1)(C) and
)	18 U.S.C. § 2
CHARLES V. WILLIAMS,)	NMT 20 Years Imprisonment
a/k/a "Cortez Hanley")	NMT \$1,000,000 Fine
[DOB: 11/09/1987])	NLT 3 Years Supervised Release
)	Class C Felony
KEVIN LEVANCE JACKSON,)	
[DOB: 06/03/1988])	COUNT THREE: Defendants Bifford, Griffin
)	and Scott
GARY D. SMITH,)	21 U.S.C. §§ 841(a)(1) and (b)(1)(C) and
[DOB: 06/06/1966])	18 U.S.C. § 2
)	NMT 20 Years Imprisonment
TAJ RUNNELL GRIFFIN,)	NMT \$1,000,000 Fine
[DOB: 07/19/1991])	NLT 3 Years Supervised Release
)	Class C Felony
DERON ANDREW SCOTT,)	
[DOB: 04/30/1987])	COUNT FOUR: Defendant Gilbert only
)	21 U.S.C. §§ 841(a)(1) and (b)(1)(C)
Defendants.)	NMT 20 Years Imprisonment
)	NMT \$1,000,000 Fine
)	NLT 3 Years Supervised Release
)	Class C Felony
)	
)	COUNT FIVE: Defendant Bifford only
)	18 U.S.C. §§ 922(g)(1) and 924(a)(2) and
)	18 U.S.C. § 2
)	NMT 10 Years Imprisonment
)	NMT \$250,000 Fine
)	NMT 3 Years Supervised Release
)	Class C Felony

-) COUNT SIX: Defendant **Scott only**
-) 18 U.S.C. §§ 922(g)(1) and 924(a)(2)
-) NMT 10 Years Imprisonment
-) NMT \$250,000 Fine
-) NMT 3 Years Supervised Release
-) Class C Felony
-)
-) COUNT SEVEN: Defendants **Bifford, Williams**
-) **and Jackson**
-) 18 U.S.C. § 924 (c)(1)(A)(i) and 18 U.S.C. § 2
-) NLT 5 Years Imprisonment
-) NMT \$250,000 Fine
-) NMT 3 Years Supervised Release
-) Class D Felony
-)
-) COUNT EIGHT: Defendant **Bifford only**
-) 18 U.S.C. § 924 (c)(1)(A)(i)
-) NLT 5 Years Imprisonment
-) NMT \$250,000 Fine
-) NMT 3 Years Supervised Release
-) Class D Felony
-)
-) COUNT NINE: Defendant **Griffin only**
-) 18 U.S.C. §§ 922(g)(3) and 924(a)(2)
-) NMT 10 Years Imprisonment
-) NMT \$250,000 Fine
-) NMT 3 Years Supervised Release
-) Class C Felony
-)
-) COUNT TEN: Defendant **Gilbert only**
-) 21 U.S.C. §§ 841(a)(1) and (b)(1)(C)
-) NMT 20 Years Imprisonment
-) NMT \$1,000,000 Fine
-) NLT 3 Years Supervised Release
-) Class C Felony
-)
-) COUNT ELEVEN: Defendant **Smith only**
-) 21 U.S.C. §§ 841(a)(1) and (b)(1)(C)
-) NMT 20 Years Imprisonment
-) NMT \$1,000,000 Fine
-) NLT 3 Years Supervised Release
-) Class C Felony

-) COUNT TWELVE: Defendant **Bifford only**
-) 21 U.S.C. §§ 841(a)(1) and (b)(1)(C)
-) NMT 20 Years Imprisonment
-) NMT \$1,000,000 Fine
-) NLT 3 Years Supervised Release
-) Class C Felony
-)
-) ALLEGATION OF CRIMINAL FORFEITURE
-) 21 U.S.C. § 853
-)
-) \$100 Mandatory Special Assessment For Each
-) Felony Count Of Conviction

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

On or between January 1, 2009 and February 8, 2011, said dates being approximate, in the Western District of Missouri and elsewhere, KEVION DARNELL BIFFORD, a/k/a Two Gun Kevi, PRINCE EARL CLARENCE GILBERT, JR., CHARLES V. WILLIAMS, a/k/a Cortez Hanley, KEVIN LEVANCE JACKSON, GARY D. SMITH, TAJ RUNNELL GRIFFIN, and DERON ANDREW SCOTT, defendants herein, did knowingly and intentionally combine, conspire, confederate and agree with each other and others, both known and unknown to the grand jury, to distribute and possess with intent to distribute a mixture or substance containing a detectable amount of cocaine base (“crack cocaine”), a Schedule II controlled substance, in an amount of twenty-eight (28) grams or more, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), all in violation of Title 21, United States Code, Section 846.

COUNT TWO

On or about August 16, 2010, said date being approximate, in the Western District of Missouri, KEVION DARNELL BIFFORD, a/k/a Two Gun Kevi, CHARLES V. WILLIAMS, a/k/a Cortez Hanley, KEVIN LEVANCE JACKSON, and GARY D. SMITH, defendants herein, aiding and abetting each other, did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of cocaine base (“crack cocaine”), a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT THREE

On or about November 10, 2010, said date being approximate, in the Western District of Missouri, KEVION DARNELL BIFFORD, a/k/a Two Gun Kevi, TAJ RUNNELL GRIFFIN, and DERON ANDREW SCOTT, defendants herein, aiding and abetting each other, did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of cocaine base (“crack cocaine”), a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT FOUR

On or about January 27, 2011, said date being approximate, in the Western District of Missouri, PRINCE EARL CLARENCE GILBERT, JR., defendant herein, did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of cocaine base (“crack cocaine”), a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT FIVE

On or about February 06, 2010, in the Western District of Missouri, Western Division, KEVION DARNELL BIFFORD, a/k/a Two Gun Kevi, defendant herein, aiding and abetting another, having been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm and ammunition, to wit: a loaded Smith and Wesson .40 caliber semi-automatic handgun serial number DSE7963, all which had been transported in interstate commerce. All contrary to the provisions of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2) and Title 18, United States Code, Section 2.

COUNT SIX

On or about November 11, 2010, in the Western District of Missouri, Western Division, DERON ANDREW SCOTT, defendant herein, having been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm and ammunition, to wit: a loaded Glock 10 mm semi-automatic handgun serial number CLX352US, all which had been transported in interstate commerce. All contrary to the provisions of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT SEVEN

On or between August 1, 2010 and August 17, 2010, in the Western District of Missouri, KEVION DARNELL BIFFORD, a/k/a Two Gun Kevi, CHARLES V. WILLIAMS, a/k/a Cortez Hanley, and KEVIN LEVANCE JACKSON, defendants herein, during or in relation to a drug trafficking crime and in furtherance of a drug trafficking crime, both for which they may be prosecuted in a court of the United States, that is, those crimes set out in Counts 1, 2, 3, and 12 of

this indictment, all allegations of which are incorporated herein by reference, aiding and abetting each other and others, used, carried and possessed firearms, to wit: a loaded Stoeger Couger 8040 .357 caliber semi-automatic handgun serial number T6429, a loaded Glock .40 caliber semi-automatic handgun serial number KEC574, a loaded Glock .40 caliber semi-automatic handgun serial number EKH848, and a loaded Glock 9mm semi-automatic handgun serial number NFR017, all contrary to the provisions of Title 18, United States Code, Section 924(c)(1)(A)(i) and Title 18 U.S.C. § 2.

COUNT EIGHT

On or about November 10, 2010, in the Western District of Missouri, KEVION DARNELL BIFFORD, a/k/a Two Gun Kevi, defendant herein, during or in relation to a drug trafficking crime and in furtherance of a drug trafficking crime, both for which he may be prosecuted in a court of the United States, that is, those crimes set out in Counts 1, 2, 3, and 12 of this indictment, all allegations of which are incorporated herein by reference, used, carried and possessed a firearm, to wit: a loaded Smith and Wesson 9mm semi-automatic handgun serial number TCW0847, all contrary to the provisions of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT NINE

On or about April 14, 2010, in the Western District of Missouri, Western Division, TAJ RUNNELL GRIFFIN, defendant herein, being an unlawful user of or addicted to any controlled substance, marijuana, did knowingly possess, in and affecting commerce, a firearm and ammunition, to wit: a loaded Glock .40 caliber semi-automatic handgun serial number NFC404, all which had been transported in interstate commerce. All contrary to the provisions of Title 18,

United States Code, Sections 922(g)(3) and 924(a)(2).

COUNT TEN

On or between August 04, 2010 and January 27, 2011, said dates being approximate, in the Western District of Missouri, PRINCE EARL CLARENCE GILBERT, JR., defendant herein, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine base (“crack cocaine”), a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT ELEVEN

On or between September 14, 2010 and October 25, 2010, said dates being approximate, in the Western District of Missouri, GARY D. SMITH, defendant herein, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine base (“crack cocaine”), a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT TWELVE

On or about November 05, 2010, in the Western District of Missouri, KEVION DARNELL BIFFORD, a/k/a Two Gun Kevi, defendant herein, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

ALLEGATION OF FORFEITURE

The allegations contained in Counts 1, 2, 3, 4, 10, and 12 of this Indictment are re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of

Title 21, United States Code, Section 853.

Each defendant named herein shall forfeit to the United States all property, real and personal, constituting or derived from any proceeds the defendant obtained directly and indirectly as a result of the violation incorporated by reference in this Allegation of Forfeiture Count and all property used, or intended to be used, in any manner or part, to commit, and to facilitate the commission of the violation incorporated by reference in this allegation, including but not limited to the following:

Personal Property

1. 2000 Lincoln LS, Missouri Vehicle License Tag # WE9V3W, Vehicle Identification Number (VIN) 1LNHM87A8YY602318, last known operator, Defendant DERON ANDREW SCOTT, on November 10, 2010 and searched on November 11, 2010 with the recovery of a loaded Glock handgun and over 1/4 kilo of marijuana.
2. 2006 Dodge Charger, Kansas Vehicle License Tag # 456CEM, VIN 2B3KKA43R86H333236, last known operator Defendant KEVION DARNELL BIFFORD, a/k/a Two Gun Kevi, on November 10, 2010 and searched on November 11, 2010 with the recovery of marijuana and US Currency.
3. Late model, gray, two-door, Chevrolet Malibu with a Missouri Temporary License Tag, last known operator, Defendant PRINCE EARL CLARENCE GILBERT, JR., on January 27, 2011, while conducting the “crack” distribution in Count Ten of this indictment.
4. \$2,438.00 in US Currency recovered during various narcotic law enforcement operations during the conspiracy period set out in Count One of this indictment.

Money Judgment

As to all defendants, jointly and severally, they shall forfeit any and all interest in approximately \$100,000.00 in United States currency, and any interest and proceeds traceable thereto, in that at least this sum, in aggregate, was received in exchange for the unlawful dispensing and unlawful distribution of controlled substances or is traceable thereto based upon the street price of \$20.00 for 0.50 grams of “crack”, the length of the distribution conspiracy and the amount of “crack” and “powder” cocaine recovered.

Substitute Assets

If any of the above-described forfeitable property of the above-named defendants, as a result of any act or omission of the defendants –

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above-described forfeitable property.

All in violation of Title 21, United States Code, Section 853, and Rule 32.2(a), Federal Rules of Criminal Procedure.

A TRUE BILL.

Dated: 2/8/11

/s/ Constance E. Durrell
FOREPERSON OF THE GRAND JURY

/s/ Bruce Rhoades
Bruce Rhoades
Assistant United States Attorney