

1. On or about March 20, 2007, the defendant called an individual whom he believed to be his "partner" and advised him that certain other individuals, who owned a number of convenience stores, owed the defendant \$38,000, which he claimed was still owing from a promised campaign contribution of \$50,000.

2. The defendant's "partner" was in fact an individual who was cooperating with the Federal Bureau of Investigation ("FBI") in its investigation of public corruption.

3. The defendant suggested that they visit one of these individuals and "straighten his ass out."

4. On or about April 3, 2007, the defendant traveled in his Sheriff's Department car to meet with one of these store owners.

5. At this meeting, the defendant threatened to use his power as Sheriff to coerce payment of the money, saying: "We're going to have to shut a store down" and "if we go after one store, we go after all of them."

6. The defendant further stated: "From here on out there will be action taken to make them understand."

7. At this meeting, the store owner paid \$200 to mollify the defendant.

8. The defendant instructed the store owner to provide the money to his "partner."

9. Thereafter, the defendant instructed his "partner" to keep pressuring the store owners to pay.

10. On or about April 16, 2007, the defendant's "partner" advised him that the store owners had made a payment of \$1,000.

11. On or about April 16, 2007, the defendant's "partner" paid him \$1,000 in United States currency, which had been provided by the FBI, and advised the Defendant that the money came from the store owners.

12. The defendant told his "partner" to keep up the pressure and advise the store owners that "I don't know how much longer I can hold the Sheriff back."

13. The defendant stated: "We know we can get him for certain things. We know all that meth shit and stuff."

14. The defendant further told his "partner" to advise the store owners that he could close them down for Memorial Day and cost them a lot of money.

15. The defendant further advised his "partner" to contact the leader of the group of stores and arrange a meeting.

16. On or about April 26, 2007, FBI undercover agents posed as the leaders of the group of stores and met with the defendant.

17. At this meeting the defendant consented to allowing the stores to operate illegal gambling machines, provided they were kept in the backrooms.

18. The defendant further advised that the stores could sell methamphetamine making ingredients but to be sure and conceal their illegal activities.

19. The defendant further stated that he expected to receive a part of the earnings generated by all of the businesses.

20. The defendant refused to accept cash at the meeting, but instructed the "Indians" to pay his "partner."

21. After the meeting, the defendant instructed his "partner" on two occasions to advise the "Indians" that they would have to pay \$100,000 per quarter for

his protection.

22. Thereafter, the defendant continued to insist that his "partner" collect the money, stating "I can't take no money from them personally, you know, because I'm afraid they're going to be feds. They'll have me and you both in jail."

23. The defendant's "partner" subsequently informed him that he had been meeting with the "Indians" and receiving money on the defendant's behalf in exchange for the defendant's protection.

C. THE EXTORTION

On or about the dates set forth below, in the Eastern District of Tennessee, the defendant, WILLIAM HORACE ("BILLY") LONG, did knowingly obstruct, delay affect, and attempt to obstruct, delay and affect commerce and the movement of articles and commodities in commerce by extortion as those terms are defined in Title 18, United States Code, Section 1951; that is to say, WILLIAM HORACE ("BILLY") LONG, obtained property not due him or his office, in the amounts set forth below, from persons known to the Grand Jury, with their consent and under color of official right:

<u>COUNT</u>	<u>DATE</u>	<u>AMOUNT</u>
One	April 3, 2007	\$200
Two	April 16, 2007	\$1000
Three	August 31, 2007	\$3500
Four	September 14, 2007	\$2000
Five	September 28, 2007	\$2000
Six	October 11, 2007	\$1900

Seven	October 22, 2007	\$1000
Eight	October 29, 2007	\$1000
Nine	November 5, 2007	\$1000
Ten	November 16, 2007	\$1000
Eleven	November 25, 2007	\$1000
Twelve	November 29, 2007	\$1000
Thirteen	December 14, 2007	\$1000

All in violation of Title 18, United States Code, Section 1951.

COUNTS FOURTEEN THROUGH NINETEEN
18 U.S.C. § 1951
EXTORTION

THE GRAND JURY FURTHER CHARGES THAT:

A. **AT ALL TIMES MATERIAL HEREIN:**

The Grand Jury realleges and incorporates by reference the allegations set forth in Parts A and B of Counts One through Thirteen above.

B. **MANNER AND MEANS**

Beginning on or about November 16, 2007 and continuing until on or about February 2, 2008, the defendant, WILLIAM HORACE (“BILLY”) LONG, engaged in extortion and attempted extortion, using his position as a public official to obtain bribes and payoffs under color of official right, in the following manner and using the following means:

1. On or about November 16, 2007, the defendant’s “partner,” while working for the FBI, represented to the defendant that he had been approached by Mexican

drug smugglers to help them ship money, representing proceeds from the sale of illegal narcotics back to Mexico.

2. The plan was for the defendant's "partner" to conceal the drug proceeds in funeral urns along with the remains of cremated human bodies.

3. The defendant gave his "partner" permission to assist in the smuggling of the money and was promised a share of the proceeds.

4. The defendant agreed to receive two percent of the money smuggled as his share and in return for his cooperation.

5. On or about November 23, 2007, the defendant offered to give his "partner" a badge to assist him in transporting the aforementioned drug trafficking proceeds.

6. On or about November 29, 2007, the defendant provided his "partner" with a brand new, Hamilton County, Tennessee, Sheriff's Department badge.

7. On or about December 3, 2007, the defendant's "partner" advised him that he had sent \$25,000 in drug money to Mexico and gave the Defendant \$550 representing his share of the proceeds.

8. On or about December 12, 2007, the defendant's "partner" showed the defendant \$50,000 in United States currency, provided by the FBI, and told the defendant he would be paid the following week.

9. On or about December 14, 2007, the defendant received \$1,000 in United States currency as his share of the drug proceeds shipment.

10. On that same date, the defendant's "partner" showed him \$100,000 in United States currency, provided by the FBI, and told the defendant that the money was drug trafficking proceeds.

11. On that same date, the defendant's "partner" expressed concern that he was keeping large amounts of money and did not have any way to protect it.

12. On or about December 20, 2007, the defendant provided his "partner," knowing him to be a convicted felon and a prohibited person, with a loaded .32 caliber revolver and warned him to throw the gun away if he shot someone.

13. On or about January 18, 2008, the defendant's "partner" advised him that he had recently shipped \$50,000 in drug trafficking proceeds and had \$1,000 to give the defendant.

14. On that same date, the Defendant's "partner" told him that he had also shipped an additional \$100,000 in drug trafficking proceeds and expected to have the defendant's share within the next week.

15. On or about January 24, 2008, the defendant's "partner" paid him \$2,000, representing his payoff in connection with the aforesaid \$100,000 shipment of drug trafficking proceeds.

16. On that same date, the defendant's "partner" showed him 10 kilograms (approximately 22 pounds) of actual cocaine, provided by the FBI, and explained that he had been asked by the head of the Mexican drug trafficking organization to ship the drugs.

17. The defendant's "partner" told him that his share of the transaction would be \$20,000.

18. After the defendant was shown the cocaine, he discussed how best to ship the cocaine and said "I hope it makes it."

19. The defendant's "partner" also told him that he had shipped an additional \$200,000 in drug proceeds to Mexico on January 24, 2008.

20. On or about February 2, 2008, the defendant's "partner" paid him \$24,000, representing his payoff for the ten kilograms of cocaine that was supposedly shipped on or about January 24, 2008, and for drug proceeds previously laundered.

C. THE EXTORTION

On or about the dates set forth below, in the Eastern District of Tennessee, the defendant, WILLIAM HORACE ("BILLY") LONG, did knowingly obstruct, delay affect, and attempt to obstruct, delay and affect commerce and the movement of articles and commodities in commerce by extortion as those terms are defined in Title 18, United States Code, Section 1951; that is to say, WILLIAM HORACE ("BILLY") LONG, obtained property not due him or his office, in the amounts set forth below, from persons known to the Grand Jury, with their consent and under color of official right:

<u>COUNT</u>	<u>DATE</u>	<u>AMOUNT</u>
Fourteen	December 3, 2007	\$550
Fifteen	December 14, 2007	\$1000
Sixteen	December 20, 2007	\$2000
Seventeen	January 18, 2007	\$1000
Eighteen	January 24, 2008	\$2000
Nineteen	February 2, 2008	\$4,000

All in violation of Title 18, United States Code, Section 1951.

COUNTS TWENTY THROUGH TWENTY- FIVE
18 U.S.C. § 1956(a)(3)(A)
MONEY LAUNDERING

THE GRAND JURY FURTHER CHARGES THAT:

A. AT ALL TIMES MATERIAL HEREIN:

The Grand Jury realleges and incorporates by reference the allegations set forth in Parts A and B of Counts Fourteen through Nineteen above.

B. THE PROMOTION

On or about the below-listed dates, in the Eastern District of Tennessee, the defendant, WILLIAM HORACE (“BILLY”) LONG, with the intent to promote the carrying on of specified unlawful activity, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce involving property, represented by another person at the direction of a Federal official authorized to investigate and prosecute violations of this section, to be the proceeds of drug trafficking activity in violation of 21 U.S.C. §§ 841 and 846, that is, money as set forth below:

<u>COUNT</u>	<u>DATE</u>	<u>AMOUNT</u>
Twenty	December 3, 2007	\$550
Twenty-One	December14, 2007	\$1000
Twenty-Two	December 20, 2007	\$2000
Twenty-Three	January 18, 2007	\$1000
Twenty-Four	January 24, 2008	\$2000
Twenty-Five	February 2, 2008	\$4,000

All in violation of Title 18, United States Code, Section 1956(a)(3)(A).

COUNT TWENTY-SIX
18 U.S.C. § 922(d)
PROVIDING A FIREARM AND AMMUNITION TO A FELON

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 20, 2007, in the Eastern District of Tennessee, the defendant, WILLIAM HORACE (“BILLY”) LONG, did knowingly provide a firearm and ammunition, that had been shipped and transported in interstate commerce, to a person whom he well knew and had reasonable cause to believe had previously been convicted in court of a felony, to wit: a crime punishable by imprisonment for a term exceeding one year.

All in violation of Title 18, United States Code, Section 922(d).

COUNT TWENTY-SEVEN
21 U.S.C. § 841(a)(1)
POSSESSION WITH INTENT TO DISTRIBUTE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 2, 2008, in the Eastern District of Tennessee, the defendant, WILLIAM HORACE (“BILLY”) LONG, did knowingly, intentionally and without authority possess with the intent to distribute five or more kilograms of a mixture and substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT TWENTY-EIGHT
18 U.S.C. § 924(c)(1)(A)(i)
POSSESSING A FIREARM IN FURTHERANCE OF A
DRUG TRAFFICKING OFFENSE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 2, 2008, in the Eastern District of Tennessee, the defendant, WILLIAM HORACE (“BILLY”) LONG, did knowingly possess a firearm in furtherance of a drug trafficking crime which may be prosecuted in a court of the United States, namely the drug trafficking crime set out in Count Twenty-Seven of this Indictment, the allegation of which is hereby incorporated herein.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

In committing the felony offense alleged in Count Twenty-Six, which is fully incorporated herein, and upon conviction, the defendant, WILLIAM HORACE (“BILLY”) LONG, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), his interest in the firearm which was used in connection with the above violation alleged in Count Twenty-Six, to wit: to a .32 Industria National de Armes (INA) revolver, serial number 219430.

A TRUE BILL:

s/ Foreperson
GRAND JURY FOREPERSON

JAMES R. DEDRICK
UNITED STATES ATTORNEY

By: s/ Gary S. Humble
Gary S. Humble
Assistant U.S. Attorney