
United States District Court
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES OF AMERICA

v.

FEDO ANTONIA MANNING,
[DOB: 03/02/2001]

COUNT ONE:

(Conspiracy to Traffic Firearms)

18 U.S.C. §§ 933(a)(1), (3), and (b)

NMT: 15 Years Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years Supervised Release

Class C Felony

COUNT TWO:

(Engaging in Firearm Sales Without a License)

18 U.S.C. §§ 922(a)(1)(A), 923(a), and 924(a)(1)(D)

NMT: 5 Years Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years Supervised Release

Class D Felony

COUNTS THREE TO TWELVE:

(Making a False Statement on ATF Form 4473)

18 U.S.C. §§ 922(a)(6) and 924(a)(2)

NMT: 10 Years Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years Supervised Release

\$100 Mandatory Special Assessment

Class C Felony

\$100 Mandatory Special Assessment for Each Count

CRIMINAL COMPLAINT

Case Number: 24-MJ-00022-WBG (LMC)

I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

COUNT ONE
(Conspiracy to Traffic Firearms)

Between on or about, May 24, 2022, and April 20, 2023, said dates being approximate, in the Western District of Missouri and elsewhere, the defendant, **FEDO ANTONIA MANNING**, and Antonio Manning, Dejuan Mietz Huntly, Sheron Lamont Manning, and Michael Dewayne Hardy, knowingly and intentionally

combined, conspired, confederated and agreed together and with each other, and with other persons, to ship, transport, transfer, cause to be transported, or otherwise dispose of firearms, to wit the following firearms:

- A Glock, Model 19, 9mm caliber, handgun, bearing Serial Number BKHR170;
- A Glock, Model 17, 9mm caliber, handgun, bearing Serial Number AARD738;
- A Glock, Model 23, .40 caliber, handgun, bearing Serial Number BUGF363;
- An Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing Serial Number 22022202;
- An Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing Serial Number 22022226;
- A Romar/Cugir, Mini Draco, 7.62 x 39 caliber, pistol, bearing Serial Number ROA 22 PG-3659;
- A Century Arms, Model “VSKA,” 7.62 x 39 caliber, pistol, bearing Serial Number SV7P008760;
- An Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing Serial Number 22022225;
- An Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing Serial Number 22022215;
- An Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing Serial Number 22021785;
- An Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing Serial Number 21412257;
- An Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing Serial Number 22094913;
- A Glock, Model 22, Model 22, .40 caliber, pistol, bearing Serial Number XCD938;
- A Glock, Model 19, 9mm caliber, pistol, bearing Serial Number BHCR180;
- A Glock, Model 41, .45 caliber, pistol, bearing Serial Number YWE140;
- An Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing an obliterated Serial Number;

- An Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing Serial Number 22108192;
- A Glock, Model 22, .40 caliber, pistol, bearing Serial Number BWTM124;
- A Glock, Model 23, .40 caliber, pistol, bearing Serial Number ZLZ965;
- A Glock, Model 19, 9mm caliber, pistol, bearing Serial Number BKPX144;
- A Glock, Model 17, 9mm caliber, pistol, bearing Serial Number BKUB535; and
- A Glock, Model 22, .40 caliber, pistol, bearing Serial Number MYR680,

to another person in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony, in violation of Title 18, United States Code, Sections 933(a)(1), (3) and (b).

COUNT TWO
(Engaging in Firearm Sales Without a License)

Between on or about, May 24, 2022, and April 20, 2023, said dates being approximate, in the Western District of Missouri and elsewhere, the defendant, **FEDO ANTONIA MANNING**, not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, contrary to the provisions of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

COUNTS THREE TO TWELVE
(Making a False Statement on ATF Form 4473)

On or about the dates listed below for the specific counts, in the Western District of Missouri, the defendant, **FEDO ANTONIA MANNING**, in connection with the acquisition and attempted acquisition of the firearms listed below for the specific counts (“firearms”), from the dealers listed below for the specific counts (“dealers”), all of which were licensed dealers of firearms within the meaning of Chapter 44 Title 18, United States Code, knowingly made a false and fictitious written statement to each of the dealers, which statement was

intended and likely to deceive each dealer, as to a fact material to the lawfulness of such sales and acquisition of the firearms to the defendant under chapter 44 of Title 18, United States Code, in that the defendant falsely represented on a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473 that in response to Question 21.a, that the defendant was the actual transferee/buyer of each firearm listed on each form and these statements and representations by the defendant were completely false, as the defendant well knew.

<u>Count</u>	<u>Date</u>	<u>Dealer</u>	<u>Firearms</u>
3	5/11/2022	Frontier Justice, Lee's Summit, Missouri	Anderson Manufacturing, Model AM-15 receiver, Multi caliber, bearing serial number 22023366
4	5/21/2022	Frontier Justice, Lee's Summit, Missouri	Anderson Manufacturing, Model AM-15 receiver, Multi caliber, bearing serial number 22023353
5	5/22/2022	Frontier Justice, Lee's Summit, Missouri	Glock, Model 48, 9mm pistol, bearing serial number BWMK796
6	5/22/2022	Frontier Justice, Lee's Summit, Missouri	Anderson Manufacturing, Model AM-15 receiver, Multi caliber, bearing serial number 22023357
7	5/26/2022	Alpha Pawn, Kansas City, Missouri	Anderson Manufacturing, AM-15 receiver, Multi caliber, bearing serial number 21404462
8	5/26/2022	Alpha Pawn, Kansas City, Missouri	Anderson Manufacturing, AM-15 receiver, Multi caliber, bearing serial number 21404472
9	7/19/2022	Frontier Justice, Lee's Summit, Missouri	Anderson Manufacturing, Model AM-15 receiver, Multi caliber, bearing serial number 22022225
10	8/7/2022	Frontier Justice, Lee's Summit, Missouri	Anderson Manufacturing, Model AM-15 receiver, Multi caliber, bearing serial number 22022235
11	8/7/2022	Frontier Justice, Lee's Summit, Missouri	Anderson Manufacturing, Model AM-15 receiver, Multi caliber, bearing serial number 22022228
12	1/13/2023	Alpha Pawn, Kansas City, Missouri	Anderson Manufacturing, Model AM-15 receiver, Multi caliber, bearing serial number 22108192

All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

I further state that I am a Special Agent with the Drug Enforcement Administration, and that this complaint is based on the following facts:

(See attached Affidavit),

Continued on the attached sheet and made a part hereof: Yes No.

Steven Lester

Digitally signed by Steven Leste
Date: 2024.03.11 14:08:44 -05'0

STEVEN LESTER

Special Agent

Bureau of Alcohol, Tobacco, Firearms and Explosives

Sworn to before me ~~and subscribed in my presence,~~

March 11, 2024

Sworn to by telephone
4:35 PM, Mar 11, 2024

Date

at

Kansas City, Missouri

City and State

HONORABLE LAJUANA M. COUNTS

United States Magistrate Judge

Name and Title of Judicial Officer

Lajuana M. Counts

Signature of Judicial Officer

