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2
3 UNITED STATES DISTRICT COURT
4 FOR THE CENTRAL DISTRICT OF CALIFORNIA
5 February 2002 Grand Jury

6 UNITED STATES OF AMERICA,)

CR 02-_____

7 Plaintiff,)

I N D I C T M E N T

8 v.)

[18 U.S.C. § 1962(c): Racketeer
Influenced and Corrupt
9 Organizations; 18 U.S.C. §
10 1962(d): Racketeer Influenced
and Corrupt Organizations
11 Conspiracy; 18 U.S.C. §
12 1959(a)(1): Violent Crimes in
Aid of Racketeering; 18 U.S.C.
§ 1111: Murder]

9 BARRY BYRON MILLS,)

aka "McB,")

10 TYLER DAVIS BINGHAM,)

aka "T.D.,")

11 aka "The Hulk,")

aka "T,")

12 aka "Bull,")

JOHN WILLIAM STINSON,)

13 aka "Youngster,")

aka "The Youngest,")

14 RICHARD LLOYD TERFLINGER,)

aka "Bart Simpson,")

15 ROBERT LEE GRIFFIN,)

aka "Blinky,")

16 aka "McGrif,")

RONALD BOYD SLOCUM,)

17 aka "Slo,")

aka "McKool,")

18 DAVID ALLEN CHANCE,)

19 MICHAEL PATRICK McELHINEY,)

aka "Big Mac,")

DAVID MICHAEL SAHAKIAN,)

20 CLEO ROY,)

aka "Elroy,")

21 aka "Cow Hampshire,")

GLENN RICHARD FILKINS,)

22 aka "G,")

STEVE LOREN SCOTT,)

23 aka "Scottie,")

WAYNE BRIDGEWATER,)

24 STEVEN WILLIAM HICKLIN,)

CHRISTOPHER OVERTON GIBSON,)

25 MICHAEL BRUCE SHEPHERD,)

aka "Tank,")

26 EDWARD TYLER BURNETT,)

EDGAR WESLEY HEVLE,)

27 aka "Snail,")

28

GWJ:sp

1 MARK ALAN NYQUIST,)
2 aka "Big Mark,")
3 aka "Mark Owen,")
4 JOHN HENRY HARPER,)
5 aka "Turtle,")
6 aka "John Henry,")
7 GLEN ALAN WEST,)
8 aka "Speedy,")
9 GARY JOE LITTRELL,)
10 ELLIOTT SCOTT GRIZZLE,)
11 aka "Scott,")
12 THOMAS LEROY HAMPTON,)
13 aka "Lucifer,")
14 JOHN STANLEY CAMPBELL, JR.,)
15 JESSE ANTONIO VAN METER,)
16 DONALD EDWARD KENNEDY,)
17 RICHARD SCOTT McINTOSH,)
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27 aka "The Girl Down The)
28 Street,")
29 JOANNE LOUISE GUTHRIE,)
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31 SEAN MATTHEW DARCY,)
32 MARTY LAINE FOAKES,)
33 aka "Marty Donahue,")
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35 BRENDA JO RILEY,)
36 aka "Brenda Grizzle," and)
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Defendants.

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

THE RACKETEERING ENTERPRISE

1. At all relevant times, defendants BARRY BYRON MILLS,
aka "McB," TYLER DAVIS BINGHAM, aka "T.D.," aka "The Hulk," aka
"T," aka "Bull," JOHN WILLIAM STINSON, aka "Youngster," aka "The

1 Youngest," RICHARD LLOYD TERFLINGER, aka "Bart Simpson," ROBERT
2 LEE GRIFFIN, aka "Blinky," aka "McGrif," RONALD BOYD SLOCUM, aka
3 "Slo," aka "McKool," DAVID ALLEN CHANCE, MICHAEL PATRICK
4 McELHINEY, aka "Big Mac," DAVID MICHAEL SAHAKIAN, CLEO ROY, aka
5 "Elroy," aka "Cow Hampshire," GLENN RICHARD FILKINS, aka "G,"
6 STEVE LOREN SCOTT, aka "Scottie," WAYNE BRIDGEWATER, STEVEN
7 WILLIAM HICKLIN, CHRISTOPHER OVERTON GIBSON, MICHAEL BRUCE
8 SHEPHERD, aka "Tank," EDWARD TYLER BURNETT, EDGAR WESLEY HEVLE,
9 aka "Snail," MARK ALAN NYQUIST, aka "Big Mark," aka "Mark Owen,"
10 JOHN HENRY HARPER, aka "Turtle," aka "John Henry," GLEN ALAN
11 WEST, aka "Speedy," GARY JOE LITRELL, ELLIOTT SCOTT GRIZZLE, aka
12 "Scott," THOMAS LEROY HAMPTON, aka "Lucifer," JOHN STANLEY
13 CAMPBELL, JR., JESSE ANTONIO VAN METER, DONALD EDWARD KENNEDY,
14 RICHARD SCOTT McINTOSH, CARL EDGAR KNORR, JR., JASON LEE
15 SCHWYHART, HENRY MICHAEL HOUSTON, aka "Tweak," MANUEL LARRY
16 JACKSON, aka "Cricket," RAFAEL GONZALEZ-MUNOZ, JR., aka "Cisco,"
17 DEBRA LEE STINSON, aka "The Girl Down The Street," JOANNE LOUISE
18 GUTHRIE, aka "Shorty," SEAN MATTHEW DARCY, MARTY LAINE FOAKES,
19 aka "Marty Donahue," LEE ANN MARTIN, BRENDA JO RILEY, aka "Brenda
20 Grizzle," and JOSEPH PRINCIPE, and others, were members and
21 associates of a criminal organization whose members and
22 associates engaged in, among other things, murder, attempted
23 murder, conspiracy to commit murder, extortion, robbery, and
24 narcotics trafficking. At all relevant times, this organization,
25 which is known as "the Aryan Brotherhood," operated in the
26 Central District of California and elsewhere. The Aryan
27 Brotherhood and the individuals who associate with it for
28 criminal purposes constitute an "enterprise" as defined by Title

1 18, United States Code, Section 1961(4), that is, a group of
2 individuals associated in fact, who engaged in, and whose
3 activities affected, interstate and foreign commerce. The
4 enterprise constituted an ongoing organization whose members
5 functioned as a continuing unit for a common purpose of achieving
6 the objectives of the enterprise.

7 GENERAL BACKGROUND

8 2. The Aryan Brotherhood is a powerful gang that controls
9 drug distribution and other illegal activity within portions of
10 the California and federal prison systems and has worked to
11 expand its influence over illegal activity conducted outside of
12 prison.

13 3. The Aryan Brotherhood was formed in the California
14 prison system in approximately 1964 by white inmates who wanted
15 to gain power and authority in prison by forming a race-based
16 gang. While it is not necessary to be white to join the Aryan
17 Brotherhood, nearly all of its members are white. All Aryan
18 Brotherhood members are male.

19 4. Although the Aryan Brotherhood began in the California
20 prison system, it has spread to other prison systems. During the
21 early 1970's, members of the Aryan Brotherhood who had entered
22 the federal prison system formed a faction of the Aryan
23 Brotherhood in the federal prison system. Although the
24 California and federal factions have distinct membership and
25 leadership, both are part of one organization called the Aryan
26 Brotherhood. If a member of either faction enters the prison
27 system controlled by the other faction, that member automatically
28 becomes a member in his new prison system. Although there are

1 Aryan Brotherhood members in other prison systems, the California
2 and federal factions are the Aryan Brotherhood's primary
3 factions.

4 5. In addition to Aryan Brotherhood members in prison,
5 there are members who have been released from prison. When Aryan
6 Brotherhood members leave prison, they are required to remain
7 loyal to the Aryan Brotherhood and to work to further the goals
8 of the Aryan Brotherhood while in the community.

9 6. The Aryan Brotherhood enforces its rules and promotes
10 discipline among its members and associates by murdering,
11 attempting to murder, conspiring to murder, assaulting, and
12 threatening those who violate the enterprise's rules or pose a
13 threat to the enterprise. The Aryan Brotherhood also uses murder
14 and the threat of murder to maintain a position of power within
15 the California and federal prison systems. Inmates and others
16 who do not follow the orders of the Aryan Brotherhood are subject
17 to being murdered, as is anyone who uses violence against an
18 Aryan Brotherhood member. Inmates who cooperate with law
19 enforcement authorities are also subject to being murdered.

20 MEMBERSHIP

21 7. Aryan Brotherhood members are recruited from the prison
22 population. In order to be considered for membership in the
23 Aryan Brotherhood, an inmate must be sponsored by a member. Once
24 an inmate is sponsored, he generally must serve a term of
25 "probation" while his conduct is observed by the members of the
26 Aryan Brotherhood. If the inmate's conduct during the
27 probationary period is satisfactory, he is admitted into the
28 Aryan Brotherhood. Once accepted as an Aryan Brotherhood member,

1 the inmate must swear an oath of loyalty, pledging his life to
2 the Aryan Brotherhood.

3 8. Members are required to follow all orders of higher-
4 ranking members. In particular, members are required, when
5 ordered, to kill without hesitation. They are also required to
6 give false testimony in court on behalf of other members.
7 Members who do not fulfill their obligations to the Aryan
8 Brotherhood are subject to being murdered.

9 9. In addition to members, the enterprise includes those
10 closely affiliated with the Aryan Brotherhood, who are called
11 "associates." Associates are required to follow the orders of
12 Aryan Brotherhood members. Associates who do not fulfill their
13 obligations to the Aryan Brotherhood are subject to being
14 murdered.

15 LEADERSHIP STRUCTURE

16 10. Originally, the Aryan Brotherhood did not have a
17 leadership structure, but instead was governed by consensus. In
18 approximately 1980, with the blessing of the California faction
19 of the Aryan Brotherhood, the members of the federal faction
20 formed a three-man Federal "Commission" with authority over the
21 activities of the federal faction. In approximately 1993, the
22 members of the Federal Commission formed a "council," reporting
23 to the Federal Commission, with authority over day-to-day
24 operations of the federal faction.

25 11. In approximately 1982, inmates in the California
26 faction of the Aryan Brotherhood met and formed a 12-man
27 California Council to govern the faction's affairs. The members
28 of the California Council then formed a three-man California

1 Commission with authority over the California Council and all
2 other California Aryan Brotherhood members. The number of
3 members on the California Council has since been reduced to six.

4 12. In both the California and federal factions of the
5 Aryan Brotherhood, the commission in charge of a particular
6 faction has final authority over all matters involving that
7 faction. A murder of or assault on a member may be carried out
8 only if it is authorized by the commission of the faction to
9 which the member belongs, although the murder of a nonmember does
10 not require commission approval.

11 PURPOSES OF THE ENTERPRISE

12 13. The members of the Aryan Brotherhood and their
13 associates constitute an enterprise, referred to below as "the
14 Aryan Brotherhood," "the Aryan Brotherhood criminal enterprise,"
15 or "the enterprise." The word "member" as used below refers to a
16 full-fledged member of the Aryan Brotherhood. Both members and
17 associates of the Aryan Brotherhood are participants in the Aryan
18 Brotherhood criminal enterprise.

19 14. The purposes of the Aryan Brotherhood criminal
20 enterprise include, but are not limited to, the following:

21 a. Controlling illegal activities, such as narcotics
22 trafficking, gambling, and extortion, within the California and
23 federal prison systems.

24 b. Preserving, protecting, and expanding the power of
25 the Aryan Brotherhood through the use of intimidation, violence,
26 threats of violence, assaults, and murders.

27 c. Promoting and enhancing the Aryan Brotherhood and
28 the activities of its members and associates.

1 THE MEANS AND METHODS OF THE ENTERPRISE

2 15. Among the means and methods by which the defendants and
3 their co-racketeers conduct and participate in the conduct of the
4 affairs of the Aryan Brotherhood criminal enterprise are the
5 following:

6 a. Members of the Aryan Brotherhood use the Aryan
7 Brotherhood criminal enterprise to commit, and attempt and
8 threaten to commit, acts of violence, including murder and
9 assault, to protect and expand the enterprise's criminal
10 operations.

11 b. Members of the Aryan Brotherhood use the Aryan
12 Brotherhood criminal enterprise to promote a climate of fear
13 through violence and threats of violence.

14 c. Members of the Aryan Brotherhood promulgate rules
15 to be followed by all participants in the Aryan Brotherhood
16 criminal enterprise, including the rule that a participant in the
17 enterprise may not act as an informant for law enforcement
18 authorities.

19 d. To enforce the rules of the Aryan Brotherhood
20 criminal enterprise and to promote discipline, the members of the
21 Aryan Brotherhood use the enterprise to murder, attempt to
22 murder, assault, and threaten those participants in the
23 enterprise and others who violate rules or orders, or who pose a
24 threat to the enterprise.

25 e. To generate income, participants in the Aryan
26 Brotherhood criminal enterprise engage in illegal activities
27 under the protection of the enterprise, including narcotics
28 trafficking, bookmaking, extortion, robbery, and contract murder.

1 f. To generate income, participants in the Aryan
2 Brotherhood criminal enterprise require that white inmates
3 engaged in profit-making activities in prison pay "taxes" to the
4 Aryan Brotherhood under threat of violence.

5 g. To generate income, participants in the Aryan
6 Brotherhood criminal enterprise who are not in prison require
7 that white narcotics dealers and other white criminals pay
8 "taxes" to the Aryan Brotherhood under threat of violence.

9 h. To perpetuate the Aryan Brotherhood criminal
10 enterprise, participants in the enterprise attempt to conceal
11 from law enforcement the existence of the Aryan Brotherhood, the
12 identity of its participants, and the ways in which it conducts
13 its affairs.

14 i. To keep secret the activities of the Aryan
15 Brotherhood criminal enterprise, participants in the enterprise
16 communicate using codes and hidden messages, and use a network of
17 Aryan Brotherhood members and associates outside of prison to
18 relay messages to incarcerated members and associates.

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COUNT ONE

[18 U.S.C. § 1962(c)]

16. Paragraphs One through Fifteen of the Introductory Allegations of this Indictment are realleged and incorporated by reference as though fully set forth herein.

THE RACKETEERING OFFENSE

17. Beginning on a date unknown to the Grand Jury and continuing until at least July 25, 2002, within the Central District of California and elsewhere, defendants BARRY BYRON MILLS, aka "McB," TYLER DAVIS BINGHAM, aka "T.D.," aka "The Hulk," aka "T," aka "Bull," RONALD BOYD SLOCUM, aka "Slo," aka "McKool," MICHAEL PATRICK McELHINEY, aka "Big Mac," DAVID MICHAEL SAHAKIAN, STEVE LOREN SCOTT, aka "Scottie," WAYNE BRIDGEWATER, STEVEN WILLIAM HICKLIN, CHRISTOPHER OVERTON GIBSON, ELLIOTT SCOTT GRIZZLE, aka "Scott," JOHN STANLEY CAMPBELL, JR., JESSE ANTONIO VAN METER, RICHARD SCOTT McINTOSH, CARL EDGAR KNORR, JR., JASON LEE SCHWYHART, and HENRY MICHAEL HOUSTON, aka "Tweak," and others known and unknown, being persons employed by and associated with the Aryan Brotherhood criminal enterprise, described above, and who either were leaders of the enterprise who directed other members of the enterprise in carrying out unlawful and other activities in furtherance of the conduct of the enterprise's affairs or who participated in unlawful and other activities under the direction of leaders of the enterprise in furtherance of the conduct of the enterprise's affairs, unlawfully and knowingly did direct and participate in, directly and indirectly, the conduct of the affairs of the enterprise, which enterprise was engaged in, and the activities of which affected, interstate

1 and foreign commerce, through a pattern of racketeering activity,
2 as that term is defined in Title 18, United States Code, Sections
3 1961(1) and 1961(5), and as set forth below.

4 THE PATTERN OF RACKETEERING ACTIVITY

5 18. The pattern of racketeering activity, as defined in
6 Title 18, United States Code, Sections 1961(1) and 1961(5),
7 consisted of the following acts:

8
9 Racketeering Act One

10 19. The defendant named below committed the following acts
11 involving murder, either one of which constitutes the commission
12 of Racketeering Act One:

13 a. Conspiracy to Murder John Marzloff

14 Beginning on a date unknown to the Grand Jury and continuing
15 until May 20, 1979, defendant BARRY BYRON MILLS and others
16 conspired to murder John Marzloff, and a coconspirator committed
17 an overt act in furtherance of the conspiracy, in violation of
18 Sections 16-4-8 and 16-5-1 of the Official Code of Georgia.

19 b. Murder of John Marzloff

20 On or about May 20, 1979, defendant BARRY BYRON MILLS and
21 others unlawfully, willfully, deliberately, maliciously, and with
22 premeditation and malice aforethought murdered John Marzloff, in
23 violation of Section 16-5-1 of the Official Code of Georgia.

24
25 Racketeering Act Two

26 20. The defendant named below committed the following acts
27 involving murder, either one of which constitutes the commission
28 of Racketeering Act Two:

1 a. Conspiracy to Murder Robert Hogan

2 Beginning on a date unknown to the Grand Jury and continuing
3 until June 8, 1980, defendant BARRY BYRON MILLS and others
4 conspired to murder Robert Hogan, and a coconspirator committed
5 an overt act in furtherance of the conspiracy, in violation of
6 Illinois Criminal Code Sections 8-2 and 9-1.

7 b. Murder of Robert Hogan

8 On or about June 8, 1980, defendant BARRY BYRON MILLS and
9 others unlawfully, willfully, deliberately, maliciously, and with
10 premeditation and malice aforethought did aid, abet, advise,
11 encourage, and otherwise willfully participate in the murder of
12 Robert Hogan, in violation of Illinois Criminal Code Sections 5-2
13 and 9-1.

14
15 Racketeering Act Three

16 21. The defendants named below committed the following acts
17 involving murder, either one of which constitutes the commission
18 of Racketeering Act Three:

19 _____ a. Conspiracy to Murder Richard Barnes

20 Beginning on a date unknown to the Grand Jury and continuing
21 until February 13, 1983, within the Central District of
22 California and elsewhere, defendant RONALD BOYD SLOCUM and others
23 conspired to murder Richard Barnes, and a coconspirator committed
24 an overt act in furtherance of the conspiracy, in violation of
25 California Penal Code Sections 182 and 187.

26 b. Murder of Richard Barnes

27 On or about February 13, 1983, within the Central District
28 of California and elsewhere, defendant RONALD BOYD SLOCUM and

1 others unlawfully, willfully, deliberately, maliciously, and with
2 premeditation and malice aforethought did aid, abet, advise,
3 encourage, and otherwise willfully participate in the murder of
4 Richard Barnes, in violation of California Penal Code Sections 31
5 and 187.

6
7 Racketeering Act Four

8 22. The defendant named below committed the following acts
9 involving murder, either one of which constitutes the commission
10 of Racketeering Act Four:

11 a. Conspiracy to Murder Gregory Keefer

12 Beginning on a date unknown to the Grand Jury and continuing
13 until September 23, 1983, defendant BARRY BYRON MILLS and others
14 conspired to murder Gregory Keefer, and a coconspirator committed
15 an overt act in furtherance of the conspiracy, in violation of
16 Illinois Criminal Code Sections 8-2 and 9-1.

17 b. Murder of Gregory Keefer

18 On or about September 23, 1983, defendant BARRY BYRON MILLS
19 and others unlawfully, willfully, deliberately, maliciously, and
20 with premeditation and malice aforethought did aid, abet, advise,
21 encourage, and otherwise willfully participate in the murder of
22 Gregory Keefer, in violation of Illinois Criminal Code Sections
23 5-2 and 9-1.

24
25 Racketeering Act Five

26 23. The defendants named below committed the following acts
27 involving murder, either one of which constitutes the commission
28 of Racketeering Act Five:

1 a. Conspiracy to Murder Richard Andreasen

2 Beginning on a date unknown to the Grand Jury and continuing
3 until October 6, 1983, within the Central District of California
4 and elsewhere, defendants BARRY BYRON MILLS and RONALD BOYD
5 SLOCUM, and others, conspired to murder Richard Andreasen, and a
6 coconspirator committed an overt act in furtherance of the
7 conspiracy, in violation of Kansas Criminal Code Sections 21-3302
8 and 21-3401.

9 b. Murder of Richard Andreasen

10 On or about October 6, 1983, within the Central District of
11 California and elsewhere, defendants BARRY BYRON MILLS and RONALD
12 BOYD SLOCUM, and others, unlawfully, willfully, deliberately,
13 maliciously, and with premeditation and malice aforethought did
14 aid, abet, advise, encourage, and otherwise willfully participate
15 in the murder of Richard Andreasen, in violation of Kansas
16 Criminal Code Sections 21-3205 and 21-3401.

17
18 Racketeering Act Six

19 24. The defendants named below committed the following acts
20 involving murder, either one of which constitutes the commission
21 of Racketeering Act Six:

22 _____a. Conspiracy to Murder Thomas Lamb

23 Beginning on a date unknown to the Grand Jury and continuing
24 until October 15, 1988, within the Central District of California
25 and elsewhere, defendants BARRY BYRON MILLS, RONALD BOYD SLOCUM,
26 and JOHN STANLEY CAMPBELL, JR., and others, conspired to murder
27 Thomas Lamb, and a coconspirator committed an overt act in
28 furtherance of the conspiracy, in violation of Illinois Criminal

1 Code Sections 8-2 and 9-1.

2 b. Murder of Thomas Lamb

3 On or about October 15, 1988, within the Central District of
4 California and elsewhere, defendants BARRY BYRON MILLS, RONALD
5 BOYD SLOCUM, and JOHN STANLEY CAMPBELL, JR., and others,
6 unlawfully, willfully, deliberately, maliciously, and with
7 premeditation and malice aforethought did aid, abet, advise,
8 encourage, and otherwise willfully participate in the murder of
9 Thomas Lamb, in violation of Illinois Criminal Code Sections 5-2
10 and 9-1.

11
12 Racketeering Act Seven

13 25. The defendants named below committed the following acts
14 involving murder, either one of which constitutes the commission
15 of Racketeering Act Seven:

16 a. Conspiracy to Murder Arva Lee Ray

17 Beginning on a date unknown to the Grand Jury and continuing
18 until August 9, 1989, within the Central District of California
19 and elsewhere, defendants BARRY BYRON MILLS, TYLER DAVIS BINGHAM,
20 and RONALD BOYD SLOCUM, and others, conspired to murder Arva Lee
21 Ray, and a coconspirator committed an overt act in furtherance of
22 the conspiracy, in violation of California Penal Code Sections
23 182 and 187.

24 b. Murder of Arva Lee Ray

25 On or about August 9, 1989, within the Central District of
26 California and elsewhere, defendants BARRY BYRON MILLS, TYLER
27 DAVIS BINGHAM, and RONALD BOYD SLOCUM, and others, unlawfully,
28 willfully, deliberately, maliciously, and with premeditation and

1 malice aforethought did aid, abet, advise, encourage, and
2 otherwise willfully participate in the murder of Arva Lee Ray, in
3 violation of California Penal Code Sections 31 and 187.

4
5 Racketeering Act Eight

6 26. The defendants named below committed the following acts
7 involving murder, either one of which constitutes the commission
8 of Racketeering Act Eight:

9 a. Conspiracy to Murder Jeffrey Barnett

10 Beginning on a date unknown to the Grand Jury and continuing
11 until at least March 13, 1990, within the Central District of
12 California and elsewhere, defendants BARRY BYRON MILLS, RONALD
13 BOYD SLOCUM, STEVEN WILLIAM HICKLIN, and CHRISTOPHER OVERTON
14 GIBSON, and others, conspired to murder Jeffrey Barnett, and a
15 coconspirator committed an overt act in furtherance of the
16 conspiracy, in violation of California Penal Code Sections 182
17 and 187.

18 b. Attempted Murder of Jeffrey Barnett

19 On or about March 13, 1990, within the Central District of
20 California and elsewhere, defendants BARRY BYRON MILLS, RONALD
21 BOYD SLOCUM, STEVEN WILLIAM HICKLIN, and CHRISTOPHER OVERTON
22 GIBSON, and others, unlawfully, willfully, deliberately,
23 maliciously, and with premeditation and malice aforethought did
24 aid, abet, advise, encourage, and otherwise willfully participate
25 in the attempted murder of Jeffrey Barnett, in violation of
26 California Penal Code Sections 31, 187, and 664.

1 Racketeering Act Nine

2 _____27. The defendants named below committed the following acts
3 involving murder, either one of which constitutes the commission
4 of Racketeering Act Nine:

5 a. Conspiracy to Murder Ismael Benitez-Mendez

6 Beginning on a date unknown to the Grand Jury and continuing
7 until at least January 4, 1992, defendants TYLER DAVIS BINGHAM
8 and STEVE LOREN SCOTT, and others, conspired to murder Ismael
9 Benitez-Mendez, and a coconspirator committed an overt act in
10 furtherance of the conspiracy, in violation of Kansas Criminal
11 Code Sections 21-3302 and 21-3401.

12 b. Attempted Murder of Ismael Benitez-Mendez

13 On or about January 4, 1992, defendants TYLER DAVIS BINGHAM
14 and STEVE LOREN SCOTT, and others, unlawfully, willfully,
15 deliberately, maliciously, and with premeditation and malice
16 aforethought did aid, abet, advise, encourage, and otherwise
17 willfully participate in the attempted murder of Ismael Benitez-
18 Mendez, in violation of Kansas Criminal Code Sections 21-3205,
19 21-3301, and 21-3401.

20
21 Racketeering Act Ten

22 28. The defendants named below committed the following acts
23 involving murder, either one of which constitutes the commission
24 of Racketeering Act Ten:

25 a. Conspiracy to Murder Joel Burkett

26 _____Beginning on a date unknown to the Grand Jury and continuing
27 until at least March 1, 1992, within the Central District of
28 California and elsewhere, defendants BARRY BYRON MILLS, RONALD

1 BOYD SLOCUM, and DAVID MICHAEL SAHAKIAN, and others, conspired to
2 murder Joel Burkett, and a coconspirator committed an overt act
3 in furtherance of the conspiracy, in violation of Illinois
4 Criminal Code Sections 8-2 and 9-1.

5 b. Attempted Murder of Joel Burkett

6 On or about March 1, 1992, within the Central District of
7 California and elsewhere, defendants BARRY BYRON MILLS, RONALD
8 BOYD SLOCUM, and DAVID MICHAEL SAHAKIAN, and others, unlawfully,
9 willfully, deliberately, maliciously, and with premeditation and
10 malice aforethought did aid, abet, advise, encourage, and
11 otherwise willfully participate in the attempted murder of Joel
12 Burkett, in violation of Illinois Criminal Code Sections 5-2, 8-
13 4, and 9-1.

14
15 Racketeering Act Eleven

16 29. The defendant named below committed the following acts
17 involving the distribution of narcotics, any one of which
18 constitutes the commission of Racketeering Act Eleven:

19 a. Use of a Communication Facility to Facilitate
20 Heroin Distribution on August 22, 1992

21 On or about August 22, 1992, within the Central District of
22 California and elsewhere, defendant RONALD BOYD SLOCUM knowingly
23 and intentionally used a communication facility, namely, a
24 telephone, in causing or facilitating the commission of acts
25 constituting a felony under the Controlled Substances Act, that
26 is, distribution of heroin, in violation of Title 21, United
27 States Code, Section 841(a)(1), all in violation of Title 21,
28 United States Code, Section 843(b).

1 b. Use of a Communication Facility to Facilitate
2 Heroin Distribution on August 24, 1992

3 On or about August 24, 1992, within the Central District of
4 California and elsewhere, defendant RONALD BOYD SLOCUM knowingly
5 and intentionally used a communication facility, namely, a
6 telephone, in causing or facilitating the commission of acts
7 constituting a felony under the Controlled Substances Act, that
8 is, distribution of heroin, in violation of Title 21, United
9 States Code, Section 841(a)(1), all in violation of Title 21,
10 United States Code, Section 843(b).

11 c. Use of a Communication Facility to Facilitate
12 Heroin Distribution on August 25, 1992

13 On or about August 25, 1992, within the Central District of
14 California and elsewhere, defendant RONALD BOYD SLOCUM knowingly
15 and intentionally used a communication facility, namely, a
16 telephone, in causing or facilitating the commission of acts
17 constituting a felony under the Controlled Substances Act, that
18 is, distribution of heroin, in violation of Title 21, United
19 States Code, Section 841(a)(1), all in violation of Title 21,
20 United States Code, Section 843(b).

21
22 Racketeering Act Twelve

23 30. The defendant named below committed the following acts
24 involving the distribution of narcotics, either one of which
25 constitutes the commission of Racketeering Act Twelve:

26 a. Use of a Communication Facility to Facilitate
27 Heroin Distribution on October 4, 1992

28 On or about October 4, 1992, within the Central District of

1 California and elsewhere, defendant RONALD BOYD SLOCUM knowingly
2 and intentionally used a communication facility, namely, a
3 telephone, in causing or facilitating the commission of acts
4 constituting a felony under the Controlled Substances Act, that
5 is, distribution of heroin, in violation of Title 21, United
6 States Code, Section 841(a)(1), all in violation of Title 21,
7 United States Code, Section 843(b).

8 b. Use of a Communication Facility to Facilitate
9 Heroin Distribution on October 6, 1992

10 On or about October 6, 1992, within the Central District of
11 California and elsewhere, defendant RONALD BOYD SLOCUM knowingly
12 and intentionally used a communication facility, namely, a
13 telephone, in causing or facilitating the commission of acts
14 constituting a felony under the Controlled Substances Act, that
15 is, distribution of heroin, in violation of Title 21, United
16 States Code, Section 841(a)(1), all in violation of Title 21,
17 United States Code, Section 843(b).

18
19 Racketeering Act Thirteen

20 31. The defendant named below committed the following acts
21 involving the distribution of narcotics, either one of which
22 constitutes the commission of Racketeering Act Thirteen:

23 a. Use of a Communication Facility to Facilitate
24 Heroin Distribution on November 12, 1992

25 On or about November 12, 1992, within the Central District
26 of California and elsewhere, defendant RONALD BOYD SLOCUM
27 knowingly and intentionally used a communication facility,
28 namely, a telephone, in causing or facilitating the commission of

1 acts constituting a felony under the Controlled Substances Act,
2 that is, distribution of heroin, in violation of Title 21, United
3 States Code, Section 841(a)(1), all in violation of Title 21,
4 United States Code, Section 843(b).

5 b. Use of a Communication Facility to Facilitate
6 Heroin Distribution on November 13, 1992

7 On or about November 13, 1992, within the Central District
8 of California and elsewhere, defendant RONALD BOYD SLOCUM
9 knowingly and intentionally used a communication facility,
10 namely, a telephone, in causing or facilitating the commission of
11 acts constituting a felony under the Controlled Substances Act,
12 that is, distribution of heroin, in violation of Title 21, United
13 States Code, Section 841(a)(1), all in violation of Title 21,
14 United States Code, Section 843(b).

15
16 Racketeering Act Fourteen

17 32. The defendant named below committed the following acts
18 involving the distribution of narcotics, any one of which
19 constitutes the commission of Racketeering Act Fourteen:

20 a. Use of a Communication Facility to Facilitate
21 Heroin Distribution on January 1, 1993

22 On or about January 1, 1993, within the Central District of
23 California and elsewhere, defendant RONALD BOYD SLOCUM knowingly
24 and intentionally used a communication facility, namely, a
25 telephone, in causing or facilitating the commission of acts
26 constituting a felony under the Controlled Substances Act, that
27 is, distribution of heroin, in violation of Title 21, United
28 States Code, Section 841(a)(1), all in violation of Title 21,

1 United States Code, Section 843(b).

2 b. Use of a Communication Facility to Facilitate
3 Heroin Distribution on January 9, 1993

4 On or about January 9, 1993, within the Central District of
5 California and elsewhere, defendant RONALD BOYD SLOCUM knowingly
6 and intentionally used a communication facility, namely, a
7 telephone, in causing or facilitating the commission of acts
8 constituting a felony under the Controlled Substances Act, that
9 is, distribution of heroin, in violation of Title 21, United
10 States Code, Section 841(a)(1), all in violation of Title 21,
11 United States Code, Section 843(b).

12 c. Use of a Communication Facility to Facilitate
13 Heroin Distribution on January 20, 1993

14 On or about January 20, 1993, within the Central District of
15 California and elsewhere, defendant RONALD BOYD SLOCUM knowingly
16 and intentionally used a communication facility, namely, a
17 telephone, in causing or facilitating the commission of acts
18 constituting a felony under the Controlled Substances Act, that
19 is, distribution of heroin, in violation of Title 21, United
20 States Code, Section 841(a)(1), all in violation of Title 21,
21 United States Code, Section 843(b).

22
23 Racketeering Act Fifteen

24 33. The defendants named below committed the following acts
25 involving murder, either one of which constitutes the commission
26 of Racketeering Act Fifteen:

27 a. Conspiracy to Murder William McKinney

28 Beginning on a date unknown to the Grand Jury and continuing

1 until January 8, 1993, within the Central District of California
2 and elsewhere, defendants BARRY BYRON MILLS, TYLER DAVIS BINGHAM,
3 and RONALD BOYD SLOCUM, and others, conspired to murder William
4 McKinney, and a coconspirator committed an overt act in
5 furtherance of the conspiracy, in violation of California Penal
6 Code Sections 182 and 187.

7 b. Murder of William McKinney

8 On or about December 28, 1992, within the Central District
9 of California and elsewhere, defendants BARRY BYRON MILLS, TYLER
10 DAVIS BINGHAM, and RONALD BOYD SLOCUM, and others, unlawfully,
11 willfully, deliberately, maliciously, and with premeditation and
12 malice aforethought did aid, abet, advise, encourage, and
13 otherwise willfully participate in the murder of William
14 McKinney, in violation of California Penal Code Sections 31 and
15 187.

16
17 Racketeering Act Sixteen

18 34. The defendant named below committed the following acts
19 involving the distribution of narcotics, either one of which
20 constitutes the commission of Racketeering Act Sixteen:

21 a. Use of a Communication Facility to Facilitate
22 Heroin Distribution on May 3, 1993

23 On or about May 3, 1993, within the Central District of
24 California and elsewhere, defendant RONALD BOYD SLOCUM knowingly
25 and intentionally used a communication facility, namely, a
26 telephone, in causing or facilitating the commission of acts
27 constituting a felony under the Controlled Substances Act, that
28 is, distribution of heroin, in violation of Title 21, United

1 States Code, Section 841(a)(1), all in violation of Title 21,
2 United States Code, Section 843(b).

3 b. Use of a Communication Facility to Facilitate
4 Heroin Distribution on May 17, 1993

5 On or about May 17, 1993, within the Central District of
6 California and elsewhere, defendant RONALD BOYD SLOCUM knowingly
7 and intentionally used a communication facility, namely, a
8 telephone, in causing or facilitating the commission of acts
9 constituting a felony under the Controlled Substances Act, that
10 is, distribution of heroin, in violation of Title 21, United
11 States Code, Section 841(a)(1), all in violation of Title 21,
12 United States Code, Section 843(b).

13
14 Racketeering Act Seventeen

15 35. The defendant named below committed the following acts
16 involving the distribution of narcotics, any one of which
17 constitutes the commission of Racketeering Act Seventeen:

18 a. Use of a Communication Facility to Facilitate
19 Heroin Distribution on July 3, 1993

20 On or about July 3, 1993, within the Central District of
21 California and elsewhere, defendant RONALD BOYD SLOCUM knowingly
22 and intentionally used a communication facility, namely, a
23 telephone, in causing or facilitating the commission of acts
24 constituting a felony under the Controlled Substances Act, that
25 is, distribution of heroin, in violation of Title 21, United
26 States Code, Section 841(a)(1), all in violation of Title 21,
27 United States Code, Section 843(b).

1 b. Use of a Communication Facility to Facilitate
2 Heroin Distribution on July 14, 1993

3 On or about July 14, 1993, within the Central District of
4 California and elsewhere, defendant RONALD BOYD SLOCUM knowingly
5 and intentionally used a communication facility, namely, a
6 telephone, in causing or facilitating the commission of acts
7 constituting a felony under the Controlled Substances Act, that
8 is, distribution of heroin, in violation of Title 21, United
9 States Code, Section 841(a)(1), all in violation of Title 21,
10 United States Code, Section 843(b).

11 c. Use of a Communication Facility to Facilitate
12 Heroin Distribution on July 29, 1993

13 On or about July 29, 1993, within the Central District of
14 California and elsewhere, defendant RONALD BOYD SLOCUM knowingly
15 and intentionally used a communication facility, namely, a
16 telephone, in causing or facilitating the commission of acts
17 constituting a felony under the Controlled Substances Act, that
18 is, distribution of heroin, in violation of Title 21, United
19 States Code, Section 841(a)(1), all in violation of Title 21,
20 United States Code, Section 843(b).

21
22 Racketeering Act Eighteen

23 36. The defendant named below committed the following acts
24 involving the distribution of narcotics, either one of which
25 constitutes the commission of Racketeering Act Eighteen:

26 a. Use of a Communication Facility to Facilitate
27 Heroin Distribution on August 17, 1993

28 On or about August 17, 1993, within the Central District of

1 California and elsewhere, defendant RONALD BOYD SLOCUM knowingly
2 and intentionally used a communication facility, namely, a
3 telephone, in causing or facilitating the commission of acts
4 constituting a felony under the Controlled Substances Act, that
5 is, distribution of heroin, in violation of Title 21, United
6 States Code, Section 841(a)(1), all in violation of Title 21,
7 United States Code, Section 843(b).

8 b. Use of a Communication Facility to Facilitate
9 Heroin Distribution on August 20, 1993

10 On or about August 20, 1993, within the Central District of
11 California and elsewhere, defendant RONALD BOYD SLOCUM knowingly
12 and intentionally used a communication facility, namely, a
13 telephone, in causing or facilitating the commission of acts
14 constituting a felony under the Controlled Substances Act, that
15 is, distribution of heroin, in violation of Title 21, United
16 States Code, Section 841(a)(1), all in violation of Title 21,
17 United States Code, Section 843(b).

18
19 Racketeering Act Nineteen

20 Use of a Communication Facility to Facilitate Heroin Distribution

21 37. On or about September 10, 1993, within the Central
22 District of California and elsewhere, defendant RONALD BOYD
23 SLOCUM knowingly and intentionally used a communication facility,
24 namely, a telephone, in causing or facilitating the commission of
25 acts constituting a felony under the Controlled Substances Act,
26 that is, distribution of heroin, in violation of Title 21, United
27 States Code, Section 841(a)(1), all in violation of Title 21,
28 United States Code, Section 843(b).

1 Racketeering Act Twenty

2 38. The defendants named below committed the following acts
3 involving murder, either one of which constitutes the commission
4 of Racketeering Act Twenty:

5 a. Conspiracy to Murder Jimmy Lee Inman

6 Beginning on a date unknown to the Grand Jury and continuing
7 until at least September 30, 1993, within the Central District of
8 California and elsewhere, defendants BARRY BYRON MILLS, RONALD
9 BOYD SLOCUM, and DAVID MICHAEL SAHAKIAN, and others, conspired to
10 murder Jimmy Lee Inman, and a coconspirator committed an overt
11 act in furtherance of the conspiracy, in violation of Illinois
12 Criminal Code Sections 8-2 and 9-1.

13 b. Attempted Murder of Jimmy Lee Inman

14 On or about September 30, 1993, within the Central District
15 of California and elsewhere, defendants BARRY BYRON MILLS, RONALD
16 BOYD SLOCUM, and DAVID MICHAEL SAHAKIAN, and others, unlawfully,
17 willfully, deliberately, maliciously, and with premeditation and
18 malice aforethought did aid, abet, advise, encourage, and
19 otherwise willfully participate in the attempted murder of Jimmy
20 Lee Inman, in violation of Illinois Criminal Code Sections 5-2,
21 8-4, and 9-1.

22
23 Racketeering Act Twenty-One

24 39. The defendant named below committed the following acts
25 involving the distribution of narcotics, either one of which
26 constitutes the commission of Racketeering Act Twenty-One:

1 a. Use of a Communication Facility to Facilitate
2 Heroin Distribution on October 18, 1993

3 On or about October 18, 1993, within the Central District of
4 California and elsewhere, defendant RONALD BOYD SLOCUM knowingly
5 and intentionally used a communication facility, namely, a
6 telephone, in causing or facilitating the commission of acts
7 constituting a felony under the Controlled Substances Act, that
8 is, distribution of heroin, in violation of Title 21, United
9 States Code, Section 841(a)(1), all in violation of Title 21,
10 United States Code, Section 843(b).

11 b. Use of a Communication Facility to Facilitate
12 Heroin Distribution on October 24, 1993

13 On or about October 24, 1993, within the Central District of
14 California and elsewhere, defendant RONALD BOYD SLOCUM knowingly
15 and intentionally used a communication facility, namely, a
16 telephone, in causing or facilitating the commission of acts
17 constituting a felony under the Controlled Substances Act, that
18 is, distribution of heroin, in violation of Title 21, United
19 States Code, Section 841(a)(1), all in violation of Title 21,
20 United States Code, Section 843(b).

21
22 Racketeering Act Twenty-Two

23 Use of a Communication Facility to Facilitate Heroin Distribution

24 40. On or about December 28, 1993, within the Central
25 District of California and elsewhere, defendant RONALD BOYD
26 SLOCUM knowingly and intentionally used a communication facility,
27 namely, a telephone, in causing or facilitating the commission of
28 acts constituting a felony under the Controlled Substances Act,

1 that is, distribution of heroin, in violation of Title 21, United
2 States Code, Section 841(a)(1), all in violation of Title 21,
3 United States Code, Section 843(b).

4
5 Racketeering Act Twenty-Three

6 Use of a Communication Facility to Facilitate Heroin Distribution

7 41. On or about February 12, 1994, within the Central
8 District of California and elsewhere, defendant RONALD BOYD
9 SLOCUM knowingly and intentionally used a communication facility,
10 namely, a telephone, in causing or facilitating the commission of
11 acts constituting a felony under the Controlled Substances Act,
12 that is, distribution of heroin, in violation of Title 21, United
13 States Code, Section 841(a)(1), all in violation of Title 21,
14 United States Code, Section 843(b).

15
16 Racketeering Act Twenty-Four

17 Use of a Communication Facility to Facilitate Heroin Distribution

18 42. On or about June 3, 1994, within the Central District
19 of California and elsewhere, defendant RONALD BOYD SLOCUM
20 knowingly and intentionally used a communication facility,
21 namely, a telephone, in causing or facilitating the commission of
22 acts constituting a felony under the Controlled Substances Act,
23 that is, distribution of heroin, in violation of Title 21, United
24 States Code, Section 841(a)(1), all in violation of Title 21,
25 United States Code, Section 843(b).

1 Racketeering Act Twenty-Five

2 Use of a Communication Facility to Facilitate Heroin Distribution

3 43. On or about October 4, 1994, within the Central
4 District of California and elsewhere, defendant RONALD BOYD
5 SLOCUM knowingly and intentionally used a communication facility,
6 namely, a telephone, in causing or facilitating the commission of
7 acts constituting a felony under the Controlled Substances Act,
8 that is, distribution of heroin, in violation of Title 21, United
9 States Code, Section 841(a)(1), all in violation of Title 21,
10 United States Code, Section 843(b).

11
12 Racketeering Act Twenty-Six

13 44. The defendant named below committed the following acts
14 involving the distribution of narcotics, either one of which
15 constitutes the commission of Racketeering Act Twenty-Six:

16 _____ a. Use of a Communication Facility to Facilitate
17 Heroin Distribution on February 1, 1995

18 On or about February 1, 1995, within the Central District of
19 California and elsewhere, defendant RONALD BOYD SLOCUM knowingly
20 and intentionally used a communication facility, namely, a
21 telephone, in causing or facilitating the commission of acts
22 constituting a felony under the Controlled Substances Act, that
23 is, distribution of heroin, in violation of Title 21, United
24 States Code, Section 841(a)(1), all in violation of Title 21,
25 United States Code, Section 843(b).

26 _____ b. Use of a Communication Facility to Facilitate
27 Heroin Distribution on February 17, 1995

28 On or about February 17, 1995, within the Central District

1 of California and elsewhere, defendant RONALD BOYD SLOCUM
2 knowingly and intentionally used a communication facility,
3 namely, a telephone, in causing or facilitating the commission of
4 acts constituting a felony under the Controlled Substances Act,
5 that is, distribution of heroin, in violation of Title 21, United
6 States Code, Section 841(a)(1), all in violation of Title 21,
7 United States Code, Section 843(b).

8
9 Racketeering Act Twenty-Seven

10 Use of a Communication Facility to Facilitate Heroin Distribution

11 45. On or about May 7, 1995, within the Central District of
12 California and elsewhere, defendant RONALD BOYD SLOCUM knowingly
13 and intentionally used a communication facility, namely, a
14 telephone, in causing or facilitating the commission of acts
15 constituting a felony under the Controlled Substances Act, that
16 is, distribution of heroin, in violation of Title 21, United
17 States Code, Section 841(a)(1), all in violation of Title 21,
18 United States Code, Section 843(b).

19
20 Racketeering Act Twenty-Eight

21 Use of a Communication Facility to Facilitate Heroin Distribution

22 46. On or about July 29, 1995, within the Central District
23 of California and elsewhere, defendant RONALD BOYD SLOCUM
24 knowingly and intentionally used a communication facility,
25 namely, a telephone, in causing or facilitating the commission of
26 acts constituting a felony under the Controlled Substances Act,
27 that is, distribution of heroin, in violation of Title 21, United
28 States Code, Section 841(a)(1), all in violation of Title 21,

1 United States Code, Section 843(b).

2
3 Racketeering Act Twenty-Nine

4 47. The defendants named below committed the following acts
5 involving murder, either one of which constitutes the commission
6 of Racketeering Act Twenty-Nine:

7 a. Conspiracy to Murder Charles Leger

8 Beginning on a date unknown to the Grand Jury and continuing
9 until August 25, 1995, defendants MICHAEL PATRICK McELHINEY and
10 DAVID MICHAEL SAHAKIAN, and others, conspired to murder Charles
11 Leger, and a coconspirator committed an overt act in furtherance
12 of the conspiracy, in violation of Kansas Criminal Code Sections
13 21-3302 and 21-3401.

14 b. Murder of Charles Leger

15 On or about August 25, 1995, defendants MICHAEL PATRICK
16 McELHINEY and DAVID MICHAEL SAHAKIAN, and others, unlawfully,
17 willfully, deliberately, maliciously, and with premeditation and
18 malice aforethought did aid, abet, advise, encourage, and
19 otherwise willfully participate in the murder of Charles Leger,
20 in violation of Kansas Criminal Code Sections 21-3205 and 21-
21 3401.

22
23 Racketeering Act Thirty

24 Conspiracy to Distribute Controlled Substances

25 48. Beginning on a date unknown to the Grand Jury and
26 continuing until at least September 21, 1995, within the Central
27 District of California and elsewhere, defendants RONALD BOYD
28 SLOCUM, MICHAEL PATRICK McELHINEY, and DAVID MICHAEL SAHAKIAN,

1 and others, knowingly and willfully conspired and agreed with
2 each other to commit an offense against the United States,
3 namely, to distribute controlled substances, including heroin,
4 methamphetamine, and cocaine, in violation of Title 21, United
5 States Code, Sections 841(a)(1) and 846.

6
7 Racketeering Act Thirty-One

8 Use of a Communication Facility to Facilitate Heroin Distribution

9 49. On or about September 10, 1996, within the Central
10 District of California and elsewhere, defendant RONALD BOYD
11 SLOCUM knowingly and intentionally used a communication facility,
12 namely, a telephone, in causing or facilitating the commission of
13 acts constituting a felony under the Controlled Substances Act,
14 that is, distribution of heroin, in violation of Title 21, United
15 States Code, Section 841(a)(1), all in violation of Title 21,
16 United States Code, Section 843(b).

17
18 Racketeering Act Thirty-Two

19 50. The defendants named below committed the following acts
20 involving murder, either one of which constitutes the commission
21 of Racketeering Act Thirty-Two:

22 a. Conspiracy to Murder Michael Nevergall

23 Beginning on a date unknown to the Grand Jury and continuing
24 until at least April 8, 1997, defendants BARRY BYRON MILLS and
25 CHRISTOPHER OVERTON GIBSON, and others, conspired to murder
26 Michael Nevergall, and a coconspirator committed an overt act in
27 furtherance of the conspiracy, in violation of Colorado Criminal
28 Code Sections 18-2-201 and 18-3-102.

1 b. Attempted Murder of Michael Nevergall

2 On or about April 8, 1997, defendants BARRY BYRON MILLS and
3 CHRISTOPHER OVERTON GIBSON, and others, unlawfully, willfully,
4 deliberately, maliciously, and with premeditation and malice
5 aforethought did aid, abet, advise, encourage, and otherwise
6 willfully participate in the attempted murder of Michael
7 Nevergall, in violation of Colorado Criminal Code Sections 18-1-
8 603, 18-2-101, and 18-3-102.

9
10 Racketeering Act Thirty-Three

11 51. The defendants named below committed the following acts
12 involving murder, either one of which constitutes the commission
13 of Racketeering Act Thirty-Three:

14 a. Conspiracy to Murder Aaron Marsh

15 Beginning on a date unknown to the Grand Jury and continuing
16 until July 25, 1997, defendant ELLIOTT SCOTT GRIZZLE and others
17 conspired to murder Aaron Marsh, and a coconspirator committed an
18 overt act in furtherance of the conspiracy, in violation of
19 California Penal Code Sections 182 and 187.

20 b. Murder of Aaron Marsh

21 On or about July 25, 1997, defendant ELLIOTT SCOTT GRIZZLE
22 and others unlawfully, willfully, deliberately, maliciously, and
23 with premeditation and malice aforethought did aid, abet, advise,
24 encourage, and otherwise willfully participate in the murder of
25 Aaron Marsh, in violation of California Penal Code Sections 31
26 and 187.

1 Racketeering Act Thirty-Four

2 Conspiracy to Murder Walter Johnson

3 52. Beginning on a date unknown to the Grand Jury and
4 continuing until at least September 1997, defendants BARRY BYRON
5 MILLS, MICHAEL PATRICK McELHINEY, DAVID MICHAEL SAHAKIAN, and
6 JESSE ANTONIO VAN METER, and others, conspired to murder Walter
7 Johnson, and a coconspirator committed an overt act in
8 furtherance of the conspiracy, in violation of Illinois Criminal
9 Code Sections 8-2 and 9-1.

10
11 Racketeering Act Thirty-Five

12 Conspiracy to Murder Frank Ruopoli

13 53. Beginning on a date unknown to the Grand Jury and
14 continuing until at least June 1998, within the Central District
15 of California and elsewhere, defendants BARRY BYRON MILLS and
16 RONALD BOYD SLOCUM, and others, conspired to murder Frank
17 Ruopoli, and a coconspirator committed an overt act in
18 furtherance of the conspiracy, in violation of California Penal
19 Code Sections 182 and 187.

20
21 Racketeering Act Thirty-Six

22 54. The defendant named below committed the following acts
23 involving murder, either one of which constitutes the commission
24 of Racketeering Act Thirty-Six:

25 _____ a. First Solicitation to Murder Jason Butler

26 On or about October 7, 2000, within the Central District of
27 California and elsewhere, defendant ELLIOTT SCOTT GRIZZLE did
28 unlawfully and with the intent that the crime be committed

1 solicit another, namely, Jonathan Schauerman, to commit and join
2 in the commission of the murder of Jason Butler, in violation of
3 California Penal Code Section 653f(b).

4 b. Second Solicitation to Murder Jason Butler

5 On or about October 31, 2000, within the Central District of
6 California and elsewhere, defendant ELLIOTT SCOTT GRIZZLE did
7 unlawfully and with the intent that the crime be committed
8 solicit another, namely, Jonathan Schauerman, to commit and join
9 in the commission of the murder of Jason Butler, in violation of
10 California Penal Code Section 653f(b).

11
12 Racketeering Act Thirty-Seven

13 Conspiracy to Murder Black Inmates

14 55. Beginning on a date unknown to the Grand Jury and
15 continuing until at least November 24, 2000, within the Central
16 District of California and elsewhere, defendants BARRY BYRON
17 MILLS, TYLER DAVIS BINGHAM, RONALD BOYD SLOCUM, MICHAEL PATRICK
18 McELHINEY, DAVID MICHAEL SAHAKIAN, STEVE LOREN SCOTT, WAYNE
19 BRIDGEWATER, STEVEN WILLIAM HICKLIN, CHRISTOPHER OVERTON GIBSON,
20 JOHN STANLEY CAMPBELL, JR., JESSE ANTONIO VAN METER, RICHARD
21 SCOTT McINTOSH, CARL EDGAR KNORR, JR., JASON LEE SCHWYHART, and
22 HENRY MICHAEL HOUSTON, and others, conspired to murder black
23 inmates in the institutions of the Federal Bureau of Prisons, and
24 a coconspirator committed an overt act in furtherance of the
25 conspiracy, in violation of California Penal Code Sections 182
26 and 187.

1 Racketeering Act Thirty-Eight

2 Murder of Frank Joyner

3 56. On or about August 28, 1997, within the Central
4 District of California and elsewhere, defendants BARRY BYRON
5 MILLS, TYLER DAVIS BINGHAM, RONALD BOYD SLOCUM, WAYNE
6 BRIDGEWATER, JOHN STANLEY CAMPBELL, JR., JASON LEE SCHWYHART, and
7 HENRY MICHAEL HOUSTON, and others, unlawfully, willfully,
8 deliberately, maliciously, and with premeditation and malice
9 aforethought did aid, abet, advise, encourage, and otherwise
10 willfully participate in the murder of Frank Joyner, in violation
11 of Pennsylvania Criminal Code Sections 306 and 2502.

12
13 Racketeering Act Thirty-Nine

14 Murder of Abdul Salaam

15 57. On or about August 28, 1997, within the Central
16 District of California and elsewhere, defendants BARRY BYRON
17 MILLS, TYLER DAVIS BINGHAM, RONALD BOYD SLOCUM, WAYNE
18 BRIDGEWATER, JOHN STANLEY CAMPBELL, JR., JASON LEE SCHWYHART, and
19 HENRY MICHAEL HOUSTON, and others, unlawfully, willfully,
20 deliberately, maliciously, and with premeditation and malice
21 aforethought did aid, abet, advise, encourage, and otherwise
22 willfully participate in the murder of Abdul Salaam, in violation
23 of Pennsylvania Criminal Code Sections 306 and 2502.

24
25 Racketeering Act Forty

26 Attempted Murder of Titus Webster

27 58. On or about August 28, 1997, within the Central
28 District of California and elsewhere, defendants BARRY BYRON

1 MILLS, TYLER DAVIS BINGHAM, RONALD BOYD SLOCUM, WAYNE
2 BRIDGEWATER, JOHN STANLEY CAMPBELL, JR., JASON LEE SCHWYHART, and
3 HENRY MICHAEL HOUSTON, and others, unlawfully, willfully,
4 deliberately, maliciously, and with premeditation and malice
5 aforethought did aid, abet, advise, encourage, and otherwise
6 willfully participate in the attempted murder of Titus Webster,
7 in violation of Pennsylvania Criminal Code Sections 306, 901, and
8 2502.

9
10 Racketeering Act Forty-One

11 Attempted Murder of Byron Ball

12 59. On or about August 28, 1997, within the Central
13 District of California and elsewhere, defendants BARRY BYRON
14 MILLS, TYLER DAVIS BINGHAM, RONALD BOYD SLOCUM, WAYNE
15 BRIDGEWATER, JOHN STANLEY CAMPBELL, JR., JASON LEE SCHWYHART, and
16 HENRY MICHAEL HOUSTON, and others, unlawfully, willfully,
17 deliberately, maliciously, and with premeditation and malice
18 aforethought did aid, abet, advise, encourage, and otherwise
19 willfully participate in the attempted murder of Byron Ball, in
20 violation of Pennsylvania Criminal Code Sections 306, 901, and
21 2502.

22
23 Racketeering Act Forty-Two

24 Attempted Murder of Harold Roberts

25 60. On or about August 28, 1997, within the Central
26 District of California and elsewhere, defendants BARRY BYRON
27 MILLS, TYLER DAVIS BINGHAM, RONALD BOYD SLOCUM, WAYNE
28 BRIDGEWATER, JOHN STANLEY CAMPBELL, JR., JASON LEE SCHWYHART, and

1 HENRY MICHAEL HOUSTON, and others, unlawfully, willfully,
2 deliberately, maliciously, and with premeditation and malice
3 aforethought did aid, abet, advise, encourage, and otherwise
4 willfully participate in the attempted murder of Harold Roberts,
5 in violation of Pennsylvania Criminal Code Sections 306, 901, and
6 2502.

7
8 Racketeering Act Forty-Three

9 Attempted Murder of Larry Fortune

10 61. On or about August 28, 1997, within the Central
11 District of California and elsewhere, defendants BARRY BYRON
12 MILLS, TYLER DAVIS BINGHAM, RONALD BOYD SLOCUM, WAYNE
13 BRIDGEWATER, JOHN STANLEY CAMPBELL, JR., JASON LEE SCHWYHART, and
14 HENRY MICHAEL HOUSTON, and others, unlawfully, willfully,
15 deliberately, maliciously, and with premeditation and malice
16 aforethought did aid, abet, advise, encourage, and otherwise
17 willfully participate in the attempted murder of Larry Fortune,
18 in violation of Pennsylvania Criminal Code Sections 306, 901, and
19 2502.

20
21 Racketeering Act Forty-Four

22 Attempted Murder of Wardell Hillard

23 62. On or about November 12, 1997, within the Central
24 District of California and elsewhere, defendants BARRY BYRON
25 MILLS and JESSE ANTONIO VAN METER, and others, unlawfully,
26 willfully, deliberately, maliciously, and with premeditation and
27 malice aforethought did aid, abet, advise, encourage, and
28 otherwise willfully participate in the attempted murder of

1 Wardell Hillard, in violation of Colorado Criminal Code Sections
2 18-1-603, 18-2-101, and 18-3-102.

3
4 Racketeering Act Forty-Five

5 Murder of Terry Walker

6 63. On or about May 18, 1999, within the Central District
7 of California and elsewhere, defendants MICHAEL PATRICK
8 McELHINEY, DAVID MICHAEL SAHAKIAN, RICHARD SCOTT McINTOSH, and
9 CARL EDGAR KNORR, JR., and others, unlawfully, willfully,
10 deliberately, maliciously, and with premeditation and malice
11 aforethought did aid, abet, advise, encourage, and otherwise
12 willfully participate in the murder of Terry Walker, in violation
13 of Illinois Criminal Code Sections 5-2 and 9-1.

14
15 Racketeering Act Forty-Six

16 Attempted Murder of Erving Bond

17 64. On or about November 24, 2000, within the Central
18 District of California and elsewhere, defendant STEVE LOREN SCOTT
19 and others unlawfully, willfully, deliberately, maliciously, and
20 with premeditation and malice aforethought did aid, abet, advise,
21 encourage, and otherwise willfully participate in the attempted
22 murder of Erving Bond, in violation of Missouri Revised Statutes
23 Sections 562.041, 564.011, and 565.020.

24
25 All in violation of Title 18, United States Code, Section
26 1962(c).

COUNT TWO

[18 U.S.C. § 1962(d)]

65. Paragraphs One through Fifteen of the Introductory Allegations of this Indictment are realleged and incorporated by reference as though fully set forth herein.

66. From a date unknown to the Grand Jury and continuing until at least July 25, 2002, within the Central District of California and elsewhere, defendants BARRY BYRON MILLS, aka "McB," TYLER DAVIS BINGHAM, aka "T.D.," aka "The Hulk," aka "T," aka "Bull," JOHN WILLIAM STINSON, aka "Youngster," aka "The Youngest," RICHARD LLOYD TERFLINGER, aka "Bart Simpson," ROBERT LEE GRIFFIN, aka "Blinky," aka "McGrif," RONALD BOYD SLOCUM, aka "Slo," aka "McKool," DAVID ALLEN CHANCE, MICHAEL PATRICK McELHINEY, aka "Big Mac," DAVID MICHAEL SAHAKIAN, CLEO ROY, aka "Elroy," aka "Cow Hampshire," GLENN RICHARD FILKINS, aka "G," STEVE LOREN SCOTT, aka "Scottie," WAYNE BRIDGEWATER, STEVEN WILLIAM HICKLIN, CHRISTOPHER OVERTON GIBSON, MICHAEL BRUCE SHEPHERD, aka "Tank," EDWARD TYLER BURNETT, EDGAR WESLEY HEVLE, aka "Snail," MARK ALAN NYQUIST, aka "Big Mark," aka "Mark Owen," JOHN HENRY HARPER, aka "Turtle," aka "John Henry," GARY JOE LITTRELL, ELLIOTT SCOTT GRIZZLE, aka "Scott," THOMAS LEROY HAMPTON, aka "Lucifer," JOHN STANLEY CAMPBELL, JR., JESSE ANTONIO VAN METER, RICHARD SCOTT McINTOSH, CARL EDGAR KNORR, JR., JASON LEE SCHWYHART, HENRY MICHAEL HOUSTON, aka "Tweak," MANUEL LARRY JACKSON, aka "Cricket," RAFAEL GONZALEZ-MUNOZ, JR., aka "Cisco," DEBRA LEE STINSON, aka "The Girl Down The Street," JOANNE LOUISE GUTHRIE, aka "Shorty," SEAN MATTHEW DARCY, MARTY LAINE FOAKES, aka "Marty Donahue," LEE ANN MARTIN, BRENDA JO RILEY, aka "Brenda

1 Grizzle," and JOSEPH PRINCIPE, and others known and unknown,
2 being persons employed by and associated with the Aryan
3 Brotherhood criminal enterprise described in Paragraphs One
4 through Fifteen of the Introductory Allegations of this
5 Indictment, as defined in Title 18, United States Code, Section
6 1961(4), which enterprise was engaged in, and the activities of
7 which affected, interstate and foreign commerce, unlawfully,
8 willfully, and knowingly combined, conspired, confederated, and
9 agreed together and with each other to violate Title 18, United
10 States Code, Section 1962(c), that is, to conduct and
11 participate, directly and indirectly, in the conduct of the
12 affairs of the enterprise through a pattern of racketeering
13 activity, as that term is defined in Title 18, United States
14 Code, Sections 1961(1) and 1961(5), consisting of multiple acts
15 involving murder, in violation of Sections 16-4-8 and 16-5-1 of
16 the Official Code of Georgia, Illinois Criminal Code Sections 8-2
17 and 9-1, California Penal Code Sections 182, 187, and 653f(b),
18 Kansas Criminal Code Sections 21-3302 and 21-3401, Colorado
19 Criminal Code Sections 18-2-201 and 18-3-102, Pennsylvania
20 Criminal Code Sections 306 and 2502, and Missouri Revised
21 Statutes Sections 562.041, 564.011, and 565.020; and distribution
22 of controlled substances, including heroin, methamphetamine, and
23 cocaine, in violation of Title 21, United States Code, Sections
24 841(a)(1), 843(b), and 846. It was a further part of the
25 conspiracy that the defendants agreed that a conspirator would
26 commit at least two acts of racketeering in the conduct of the
27 affairs of the enterprise.

28

1 OVERT ACTS

2 67. In furtherance of the conspiracy and to accomplish the
3 objects of the conspiracy, the defendants and their
4 coconspirators committed the following overt acts on the dates
5 set forth below:

6 Organization and Membership

7 1) In or about 1964, a group of inmates in the
8 California prison system formed the Aryan Brotherhood prison
9 gang.

10 2) In or about 1973, a group of inmates in the
11 federal prison system formed a federal faction of the Aryan
12 Brotherhood prison gang.

13 3) In or about January 1978, defendant ROBERT LEE
14 GRIFFIN sponsored Clifford Smith for membership in the Aryan
15 Brotherhood.

16 4) In or about May 1978, defendants JOHN WILLIAM
17 STINSON, RICHARD LLOYD TERFLINGER, ROBERT LEE GRIFFIN, and RONALD
18 BOYD SLOCUM, among others, voted to allow Clifford Smith to
19 become a member of the Aryan Brotherhood.

20 5) In or about 1980, defendant BARRY BYRON MILLS and
21 other Aryan Brotherhood members formed a three-member "Federal
22 Commission," including defendant BARRY BYRON MILLS, to govern the
23 activities of the federal faction of the Aryan Brotherhood.

24 6) In or about February 1982, in the Central District
25 of California, defendants JOHN WILLIAM STINSON, RICHARD LLOYD
26 TERFLINGER, ROBERT LEE GRIFFIN, RONALD BOYD SLOCUM, and EDWARD
27 TYLER BURNETT, and others, met and formed a 12-man "California
28 Council," including defendants JOHN WILLIAM STINSON, RICHARD

1 LLOYD TERFLINGER, ROBERT LEE GRIFFIN, and RONALD BOYD SLOCUM, to
2 govern the activities of the California faction of the Aryan
3 Brotherhood.

4 7) In or about February 1982, in the Central District
5 of California, the members of the California Council met and
6 formed a three-man "California Commission," including defendant
7 ROBERT LEE GRIFFIN, with authority over the council and all other
8 activities of the California faction of the Aryan Brotherhood.

9 8) On or about March 13, 1984, in the Central
10 District of California and elsewhere, defendant JOHN WILLIAM
11 STINSON sent a letter to Pete Pulos informing him that Rick Rose
12 had dropped out of the Aryan Brotherhood.

13 9) In or about September 1985, in the Central
14 District of California and elsewhere, defendant TYLER DAVIS
15 BINGHAM assumed a position as one of the three federal
16 commissioners.

17 10) In or about 1989, the members of the California
18 Commission, including defendant ROBERT LEE GRIFFIN, increased the
19 number of members of the California Commission from three to
20 four.

21 11) In or about 1989, the members of the California
22 Commission, including defendant ROBERT LEE GRIFFIN, named
23 defendants JOHN WILLIAM STINSON and RICHARD LLOYD TERFLINGER to
24 the California Commission.

25 12) In or about 1989, the members of the California
26 Commission, including defendant ROBERT LEE GRIFFIN, disbanded the
27 California Council.

28 13) In or about 1990, in the Central District of

1 California, defendant EDWARD TYLER BURNETT sponsored Brian Healy
2 for membership in the Aryan Brotherhood.

3 14) In or about July 1992, defendant BARRY BYRON MILLS
4 sponsored Lawrence Klaker for membership in the Aryan
5 Brotherhood.

6 15) In or about 1993, defendants BARRY BYRON MILLS and
7 TYLER DAVIS BINGHAM, and others, formed a "Federal Council,"
8 reporting to the Federal Commission, to govern the day-to-day
9 operations of the federal faction of the Aryan Brotherhood.

10 16) In or about 1993, defendants BARRY BYRON MILLS and
11 TYLER DAVIS BINGHAM named defendants DAVID MICHAEL SAHAKIAN, CLEO
12 ROY, and WAYNE BRIDGEWATER to the Federal Council.

13 17) In or about 1994, the members of the California
14 Commission, including defendants JOHN WILLIAM STINSON, RICHARD
15 LLOYD TERFLINGER, and ROBERT LEE GRIFFIN, increased the number of
16 members of the California Commission from four to six.

17 18) In or about 1994, the members of the California
18 Commission, including defendants JOHN WILLIAM STINSON, RICHARD
19 LLOYD TERFLINGER, and ROBERT LEE GRIFFIN, named defendant DAVID
20 ALLEN CHANCE and James Pendleton to the California Commission.

21 19) In or about 1994, defendant JOHN WILLIAM STINSON
22 sponsored defendant ELLIOTT SCOTT GRIZZLE for membership in the
23 Aryan Brotherhood.

24 20) In or about 1994, Mark Glass sponsored defendant
25 GARY JOE LITTRELL for membership in the Aryan Brotherhood.

26 21) In or about 1996, defendant BARRY BYRON MILLS
27 sought approval from defendant TYLER DAVIS BINGHAM to promote
28 defendant GLENN RICHARD FILKINS and Kevin Roach to the Federal

1 Council.

2 22) In or about 1996, defendant BARRY BYRON MILLS sent
3 a message to defendant GLENN RICHARD FILKINS proposing that the
4 Aryan Brotherhood take control of the Dirty White Boys prison
5 gang in order to get the Dirty White Boys to do the bidding of
6 the Aryan Brotherhood and to absorb the most capable members of
7 the Dirty White Boys into the Aryan Brotherhood.

8 23) In or about 1997, the members of the Federal
9 Commission, including defendants BARRY BYRON MILLS and TYLER
10 DAVIS BINGHAM, named Eugene Bentley to the Federal Council.

11 24) In or about 1997, the members of the Federal
12 Commission, including defendants BARRY BYRON MILLS and TYLER
13 DAVIS BINGHAM, formed departments within the federal faction of
14 the Aryan Brotherhood, including a security department, a drug
15 department, a gambling department, and a business department.

16 25) In or about 1997, the members of the Federal
17 Commission, including defendants BARRY BYRON MILLS and TYLER
18 DAVIS BINGHAM, placed defendant STEVE LOREN SCOTT in charge of
19 the Business Department.

20 26) In or about 1997, the members of the Federal
21 Commission, including defendants BARRY BYRON MILLS and TYLER
22 DAVIS BINGHAM, placed defendant CHRISTOPHER OVERTON GIBSON in
23 charge of the Security Department.

24 27) In or about 1997, defendant BARRY BYRON MILLS
25 sponsored Ronald Yandell for membership in the Aryan Brotherhood.

26 28) In or about January 1997, defendant GLENN RICHARD
27 FILKINS sponsored Richard Bernard for membership in the Aryan
28 Brotherhood.

1 29) In or about February 1997, defendant BARRY BYRON
2 MILLS sponsored Jonathan McGinley for membership in the Aryan
3 Brotherhood.

4 30) In or about March 1997, defendant DAVID MICHAEL
5 SAHAKIAN sponsored Michael Wagner for membership in the Aryan
6 Brotherhood.

7 31) In or about September 1997, defendants JOHN
8 STANLEY CAMPBELL, JR., JASON LEE SCHWYHART, and HENRY MICHAEL
9 HOUSTON became members of the Aryan Brotherhood as a reward for
10 participating in the murder of black inmates at the United States
11 Penitentiary at Lewisburg, Pennsylvania.

12 32) On or about September 2, 1997, defendant TYLER
13 DAVIS BINGHAM possessed a list of members of the federal faction
14 of the Aryan Brotherhood.

15 33) On or about December 25, 1997, defendant STEVE
16 LOREN SCOTT sent a message to Lawrence Klaker informing Klaker of
17 recent promotions to the Federal Council and of new members of
18 the Aryan Brotherhood.

19 34) In or about 1998, the members of the Federal
20 Commission, including defendants BARRY BYRON MILLS and TYLER
21 DAVIS BINGHAM, named defendant STEVE LOREN SCOTT to the Federal
22 Council.

23 35) In or about 1999, the members of the Federal
24 Commission, including defendants BARRY BYRON MILLS and TYLER
25 DAVIS BINGHAM, abolished the Security Department of the federal
26 faction of the Aryan Brotherhood.

27 36) On or about March 2, 1999, Aryan Brotherhood
28 member Gregory Storey possessed an Aryan Brotherhood oath.

1 37) In or about May 1999, defendant DAVID MICHAEL
2 SAHAKIAN sponsored defendant RICHARD SCOTT McINTOSH for
3 membership in the Aryan Brotherhood as a reward for murdering a
4 black inmate.

5 38) In or before July 1999, defendant MICHAEL BRUCE
6 SHEPHERD and Steven Olivares sponsored James Magee for membership
7 in the Aryan Brotherhood.

8 39) In or about July 1999, defendants JOHN WILLIAM
9 STINSON and RICHARD LLOYD TERFLINGER approved the Aryan
10 Brotherhood membership of James Magee.

11 40) In or about August 2000, the members of the
12 California Commission, including defendants JOHN WILLIAM STINSON,
13 RICHARD LLOYD TERFLINGER, and DAVID ALLEN CHANCE, decreased the
14 number of members of the California Commission from six to three.

15 41) In or about August 2000, the California
16 Commission, including defendants JOHN WILLIAM STINSON, RICHARD
17 LLOYD TERFLINGER, and DAVID ALLEN CHANCE, re-formed the
18 California Council, changing the number of members from four to
19 six.

20 42) In or about August 2000, the California
21 Commission, including defendants JOHN WILLIAM STINSON, RICHARD
22 LLOYD TERFLINGER, and DAVID ALLEN CHANCE, named defendant RONALD
23 BOYD SLOCUM, Marvin Stanton, James Pendleton, Dann Troxell, Dale
24 Bretches, and Philip Fortman to the California Council.

25 43) On or about January 30, 2001, defendant GLENN
26 RICHARD FILKINS possessed an Aryan Brotherhood oath.

27 44) On or about January 30, 2001, defendant GLENN
28 RICHARD FILKINS possessed photographs of enemies of the Aryan

1 Brotherhood who were to be killed.

2 45) On or about July 25, 2002, defendant DAVID ALLEN
3 CHANCE possessed a list of Aryan Brotherhood members and of
4 enemies of the Aryan Brotherhood who were to be killed.

5 Murder of John Marzloff

6 46) In or before May 1979, Aryan Brotherhood member
7 Thomas Silverstein asked defendant BARRY BYRON MILLS to have John
8 Marzloff murdered because Marzloff had cheated Silverstein in a
9 narcotics transaction.

10 47) On or about May 19, 1979, defendant BARRY BYRON
11 MILLS asked Ernest Danny Holliday if he would be willing to lure
12 John Marzloff to a secluded spot within the United States
13 Penitentiary at Atlanta, Georgia.

14 48) On or about May 20, 1979, defendant BARRY BYRON
15 MILLS asked John Marzloff to go to the recreation shack of the
16 United States Penitentiary at Atlanta, Georgia, so that Ernest
17 Danny Holliday could tattoo a design on Marzloff's body.

18 49) On or about May 20, 1979, defendant BARRY BYRON
19 MILLS and Ernest Danny Holliday met with John Marzloff at the
20 recreation shack of the United States Penitentiary at Atlanta,
21 Georgia, using the ruse that Holliday was going to tattoo a
22 design on Marzloff's body.

23 50) On or about May 20, 1979, defendant BARRY BYRON
24 MILLS murdered John Marzloff by stabbing him to death.

25 Murder of Robert Hogan

26 51) In or before June 1980, defendant BARRY BYRON
27 MILLS told Aryan Brotherhood member George Harp that he had
28 decided to order that Robert Hogan be murdered.

1 52) Before June 8, 1980, George Harp told Aryan
2 Brotherhood associate Everett Van Burkett that defendant BARRY
3 BYRON MILLS wanted Robert Hogan murdered.

4 53) On or about June 8, 1980, Everett Van Burkett
5 murdered Robert Hogan by stabbing him to death.

6 Murder of Richard Barnes

7 54) In or about February 1982, in the Central District
8 of California, the members of the California Council, including
9 defendants JOHN WILLIAM STINSON, RICHARD LLOYD TERFLINGER, ROBERT
10 LEE GRIFFIN, and RONALD BOYD SLOCUM, enacted an Aryan Brotherhood
11 rule that if a member of the Aryan Brotherhood became a witness
12 against the Aryan Brotherhood, a member of the witness' family
13 would be killed.

14 55) In or about February 1982, in the Central District
15 of California, the members of the California Council, including
16 defendants JOHN WILLIAM STINSON, RICHARD LLOYD TERFLINGER, ROBERT
17 LEE GRIFFIN, and RONALD BOYD SLOCUM, decided to have a family
18 member of Aryan Brotherhood member Steven Barnes murdered because
19 Barnes had testified against a member of the Aryan Brotherhood.

20 56) In or before February 1983, in the Central
21 District of California, the members of the California Council,
22 including defendants JOHN WILLIAM STINSON, RICHARD LLOYD
23 TERFLINGER, ROBERT LEE GRIFFIN, and RONALD BOYD SLOCUM, decided
24 that defendant ROBERT LEE GRIFFIN would make arrangements to
25 carry out the murder contract on a member of Steven Barnes'
26 family.

27 57) In or before February 1983, in the Central
28 District of California, the members of the California Council,

1 including defendants JOHN WILLIAM STINSON, RICHARD LLOYD
2 TERFLINGER, ROBERT LEE GRIFFIN, and RONALD BOYD SLOCUM, decided
3 that Aryan Brotherhood member Curtis Price would be given the
4 opportunity to murder a member of Steven Barnes' family.

5 58) In or before February 1983, in the Central
6 District of California, defendant ROBERT LEE GRIFFIN asked Curtis
7 Price to murder a member of Steven Barnes' family.

8 59) In or before February 1983, in the Central
9 District of California, Curtis Price agreed to murder a member of
10 Steven Barnes' family.

11 60) In or before February 1983, in the Central
12 District of California, defendant ROBERT LEE GRIFFIN arranged to
13 have firearms supplied to Curtis Price for use in murdering a
14 member of Steven Barnes' family.

15 61) In or before February 1983, in the Central
16 District of California, defendant JOHN WILLIAM STINSON provided
17 defendant ROBERT LEE GRIFFIN with the address of Richard Barnes,
18 Steven Barnes' father.

19 62) In or before February 1983, in the Central
20 District of California, defendant ROBERT LEE GRIFFIN gave Richard
21 Barnes' address to Curtis Price.

22 63) On or about February 13, 1983, in the Central
23 District of California, Curtis Price murdered Richard Barnes by
24 shooting him in the head.

25 Murder of Thomas Lamb

26 64) In or about February 1982, in the Central District
27 of California, the members of the California Council, including
28 defendants JOHN WILLIAM STINSON, RICHARD LLOYD TERFLINGER, ROBERT

1 LEE GRIFFIN, and RONALD BOYD SLOCUM, decided to order that Aryan
2 Brotherhood member Thomas Lamb be murdered for failure to carry
3 out an order to commit a murder.

4 65) On or about July 12, 1982, in the Central District
5 of California and elsewhere, defendants JOHN WILLIAM STINSON and
6 ROBERT LEE GRIFFIN sent a message to another member of the
7 California Council saying that there was a plan in place to
8 murder Thomas Lamb.

9 66) In or about October 1988, defendant BARRY BYRON
10 MILLS ordered defendant CLEO ROY to murder Thomas Lamb.

11 67) On or about October 15, 1988, defendant CLEO ROY
12 choked Thomas Lamb to death while defendant JOHN STANLEY
13 CAMPBELL, JR., held Thomas Lamb's legs.

14 68) On or about October 15, 1988, defendants CLEO ROY
15 and JOHN STANLEY CAMPBELL, JR., placed a noose around Thomas
16 Lamb's neck and hung him from shelves in his prison cell to make
17 it appear that he had committed suicide.

18 Murder of Stephen Clark

19 69) On or before July 3, 1982, in the Central District
20 of California, defendants JOHN WILLIAM STINSON and ROBERT LEE
21 GRIFFIN, and others, decided to order that Aryan Brotherhood
22 member Stephen Clark be murdered for disrespecting high-ranking
23 Aryan Brotherhood members.

24 70) On or before July 3, 1982, in the Central District
25 of California, defendants JOHN WILLIAM STINSON and ROBERT LEE
26 GRIFFIN, and others, decided that the murder of Stephen Clark
27 would be carried out by Aryan Brotherhood member Clifford Smith.

28 71) On or about July 3, 1982, in the Central District

1 of California, defendant ROBERT LEE GRIFFIN told Clifford Smith
2 to get a knife from defendant EDWARD TYLER BURNETT to be used to
3 murder Stephen Clark.

4 72) On or about July 3, 1982, in the Central District
5 of California, defendant EDWARD TYLER BURNETT supplied Clifford
6 Smith with a knife to be used to murder Stephen Clark.

7 73) On or about July 3, 1982, in the Central District
8 of California, Clifford Smith murdered Stephen Clark by stabbing
9 him to death.

10 74) On or about July 12, 1982, in the Central District
11 of California and elsewhere, defendants JOHN WILLIAM STINSON and
12 ROBERT LEE GRIFFIN sent a message to another member of the
13 California Council explaining why Stephen Clark had been
14 murdered.

15 Murder of Richard Andreasen

16 75) In or before January 1983, in the Central District
17 of California, the members of the California Council, including
18 defendants JOHN WILLIAM STINSON, RICHARD LLOYD TERFLINGER, and
19 ROBERT LEE GRIFFIN, ordered that Aryan Brotherhood associate
20 Richard Andreasen be murdered because Andreasen had provided
21 information to law enforcement authorities.

22 76) In or before January 1983, in the Central District
23 of California and elsewhere, defendant RONALD BOYD SLOCUM sent
24 word to the Federal Commission that Richard Andreasen was to be
25 murdered.

26 77) In or before May 1983, in the Central District of
27 California, the members of the California Council, including
28 defendants JOHN WILLIAM STINSON, RICHARD LLOYD TERFLINGER, and

1 ROBERT LEE GRIFFIN, ordered Aryan Brotherhood associate Rick Rose
2 to murder Richard Andreasen.

3 78) On or about May 24, 1983, in the Central District
4 of California, Rick Rose attempted to murder Richard Andreasen by
5 stabbing him.

6 79) In or before October 1983, defendant BARRY BYRON
7 MILLS ordered Aryan Brotherhood member John Greschner to murder
8 Richard Andreasen.

9 80) On or about October 6, 1983, John Greschner and
10 Aryan Brotherhood associate Ronnie Joe Chriswell murdered Richard
11 Andreasen by stabbing him to death.

12 Attempted Murder of Jeffrey Barnett

13 81) In or before June 1983, in the Central District of
14 California, defendant ROBERT LEE GRIFFIN ordered that Jeffrey
15 Barnett be murdered because Barnett's wife had refused to smuggle
16 narcotics into prison.

17 82) On or about June 19, 1983, Aryan Brotherhood
18 associate Richard Woerner attempted to murder Jeffrey Barnett by
19 stabbing him.

20 83) In or before March 1990, in the Central District
21 of California and elsewhere, defendant RONALD BOYD SLOCUM
22 informed defendant BARRY BYRON MILLS that the California
23 Commission wanted Jeffrey Barnett murdered.

24 84) In or before March 1990, in the Central District
25 of California and elsewhere, defendant BARRY BYRON MILLS ordered
26 defendant RONALD BOYD SLOCUM to have defendants STEVEN WILLIAM
27 HICKLIN and CHRISTOPHER OVERTON GIBSON murder Jeffrey Barnett.

28 85) In or before March 1990, in the Central District

1 of California, defendant RONALD BOYD SLOCUM ordered defendants
2 STEVEN WILLIAM HICKLIN and CHRISTOPHER OVERTON GIBSON to murder
3 Jeffrey Barnett.

4 86) On or about March 13, 1990, in the Central
5 District of California, defendant CHRISTOPHER OVERTON GIBSON held
6 Jeffrey Barnett while defendant STEVEN WILLIAM HICKLIN repeatedly
7 stabbed Barnett, all in an effort to murder Barnett.

8 Murder of Gregory Keefer

9 87) In or before September 1983, defendant BARRY BYRON
10 MILLS ordered Aryan Brotherhood member William McKinney to murder
11 Gregory Keefer because Keefer had given a knife belonging to the
12 Aryan Brotherhood to the Mexican Mafia prison gang.

13 88) On or about September 16, 1983, William McKinney
14 asked Stanley Pearson to assist him in murdering Gregory Keefer.

15 89) On or about September 19, 1983, defendant BARRY
16 BYRON MILLS told Stanley Pearson that the murder of Gregory
17 Keefer had been authorized by the Aryan Brotherhood.

18 90) On or about September 19, 1983, defendant BARRY
19 BYRON MILLS told Stanley Pearson to help William McKinney murder
20 Gregory Keefer.

21 91) On or about September 23, 1983, William McKinney,
22 assisted by Stanley Pearson and Robert Martin, murdered Gregory
23 Keefer by stabbing him to death.

24 Attempted Murder of Jimmy Lee Inman

25 92) In or about 1984, in the Central District of
26 California and elsewhere, the members of the California
27 Commission, including defendant ROBERT LEE GRIFFIN, ordered that
28 Jimmy Lee Inman be murdered for having assaulted an Aryan

1 Brotherhood member.

2 93) In or about 1990, in the Central District of
3 California, defendant EDWARD TYLER BURNETT told Aryan Brotherhood
4 member Brian Healy that Healy was to murder Jimmy Lee Inman if
5 given the opportunity.

6 94) In or before April 1991, in the Central District
7 of California and elsewhere, the members of the California
8 Commission, including defendants JOHN WILLIAM STINSON, RICHARD
9 LLOYD TERFLINGER, and ROBERT LEE GRIFFIN, ordered defendant DAVID
10 MICHAEL SAHAKIAN to deliver a message to the federal faction of
11 the Aryan Brotherhood requesting that Jimmy Lee Inman be
12 murdered.

13 95) In or about May 1991, defendant DAVID MICHAEL
14 SAHAKIAN delivered the message to the federal faction of the
15 Aryan Brotherhood that the California Commission wanted Jimmy Lee
16 Inman murdered.

17 96) In or before September 1991, in the Central
18 District of California and elsewhere, the members of the
19 California Commission, including defendants JOHN WILLIAM STINSON,
20 RICHARD LLOYD TERFLINGER, and ROBERT LEE GRIFFIN, sent word to
21 defendant RONALD BOYD SLOCUM that the California Commission had
22 requested that Jimmy Lee Inman be murdered.

23 97) In or before September 1991, in the Central
24 District of California and elsewhere, defendant RONALD BOYD
25 SLOCUM informed defendant BARRY BYRON MILLS that the California
26 Commission had requested that Jimmy Lee Inman be murdered.

27 98) In or about February 1992, defendant EDGAR WESLEY
28 HEVLE ordered Aryan Brotherhood member Lawrence Klaker to murder

1 Jimmy Lee Inman if given the opportunity.

2 99) In or before September 1993, defendant BARRY BYRON
3 MILLS ordered Aryan Brotherhood member Kurt King to murder Jimmy
4 Lee Inman.

5 100) On or about September 30, 1993, Kurt King
6 attempted to murder Jimmy Lee Inman by stabbing him.

7 Attempted Murder of Joel Burkett

8 101) In or about 1986, the members of the California
9 Commission, including defendant ROBERT LEE GRIFFIN, ordered that
10 Joel Burkett be murdered for giving information to prison
11 authorities about the location of weapons hidden at Folsom State
12 Prison in Represa, California.

13 102) In or about 1990, in the Central District of
14 California, defendant EDWARD TYLER BURNETT told Aryan Brotherhood
15 member Brian Healy that Healy was to murder Joel Burkett if given
16 the opportunity.

17 103) In or before April 1991, in the Central District
18 of California and elsewhere, the members of the California
19 Commission, including defendants JOHN WILLIAM STINSON, RICHARD
20 LLOYD TERFLINGER, and ROBERT LEE GRIFFIN, ordered defendant DAVID
21 MICHAEL SAHAKIAN to deliver a message to the federal faction of
22 the Aryan Brotherhood requesting that Joel Burkett be murdered.

23 104) In or about May 1991, defendant DAVID MICHAEL
24 SAHAKIAN delivered the message to the federal faction of the
25 Aryan Brotherhood that the California Commission wanted Joel
26 Burkett murdered.

27 105) In or before July 1991, in the Central District of
28 California and elsewhere, the members of the California

1 Commission, including defendants JOHN WILLIAM STINSON, RICHARD
2 LLOYD TERFLINGER, and ROBERT LEE GRIFFIN, sent word to defendant
3 RONALD BOYD SLOCUM that Joel Burkett was to be murdered.

4 106) In or before July 1991, in the Central District of
5 California and elsewhere, defendant RONALD BOYD SLOCUM informed
6 defendant BARRY BYRON MILLS that the California Commission had
7 requested that Joel Burkett be murdered.

8 107) In or before December 1991, defendant BARRY BYRON
9 MILLS told Aryan Brotherhood member John Greschner to tell Aryan
10 Brotherhood member Lawrence Klaker to murder Joel Burkett if
11 given the opportunity.

12 108) In or about December 1991, John Greschner told
13 Lawrence Klaker that defendant BARRY BYRON MILLS had ordered
14 Klaker to murder Joel Burkett if given the opportunity.

15 109) In or about February 1992, defendant EDGAR WESLEY
16 HEVLE ordered Lawrence Klaker to murder Joel Burkett if given the
17 opportunity.

18 110) On or about March 1, 1992, Lawrence Klaker
19 attempted to murder Joel Burkett by stabbing him.

20 Conspiracy to Distribute Narcotics at Los Angeles County Jail

21 111) From 1988 to 1990, in the Central District of
22 California, defendant JOHN WILLIAM STINSON sold heroin to Aryan
23 Brotherhood associate Michael Birman at Los Angeles County Jail
24 on multiple occasions.

25 112) From 1988 to 1990, in the Central District of
26 California, on multiple occasions, defendant DEBRA LEE STINSON
27 received payment from Michael Birman for the sale of heroin at
28 Los Angeles County Jail.

1 113) Between 1988 and 1990, in the Central District of
2 California, defendant JOHN WILLIAM STINSON asked Michael Birman
3 to smuggle heroin into Los Angeles County Jail.

4 114) Between April 1, 1988, and May 31, 1988, in the
5 Central District of California, defendant DEBRA LEE STINSON
6 received a money order for \$400.

7 115) Between April 1, 1988, and November 23, 1988, in
8 the Central District of California, defendant DEBRA LEE STINSON
9 arranged a three-way telephone call between defendant JOHN
10 WILLIAM STINSON and Steven Broughton, who were both inmates at
11 Los Angeles County Jail.

12 116) In or about December 1988, in the Central District
13 of California, defendant DEBRA LEE STINSON purchased heroin.

14 117) In or about December 1988, in the Central District
15 of California, defendant DEBRA LEE STINSON delivered heroin to
16 another person.

17 118) On or about November 2, 1989, in the Central
18 District of California, defendant DEBRA LEE STINSON rented a
19 mailbox at 12860 Beach Boulevard, # G-415, in Stanton,
20 California.

21 119) In or about 1990, in the Central District of
22 California, Michael Birman attempted to have his attorney smuggle
23 drugs into Los Angeles County Jail by hiding the drugs in a pair
24 of tennis shoes that were to be brought into the jail.

25 120) In or about 1990, in the Central District of
26 California, after drugs hidden in tennis shoes were found by a
27 secretary at the office of Michael Birman's attorney, defendant
28 JOHN WILLIAM STINSON told defendant DEBRA LEE STINSON to retrieve

1 the tennis shoes containing drugs from the attorney's office.

2 121) In or about 1990, in the Central District of
3 California, defendant DEBRA LEE STINSON retrieved tennis shoes
4 containing drugs from the office of Michael Birman's attorney.

5 122) On or about August 15, 1990, in the Central
6 District of California, defendant JOHN WILLIAM STINSON, while an
7 inmate at Los Angeles County Jail, sent a note to Russell Graham
8 offering to supply Graham with heroin to be sold in jail in
9 exchange for \$500.

10 123) On or about August 20, 1990, in the Central
11 District of California, defendant DEBRA LEE STINSON picked up a
12 \$500 money order from the mailbox at 12860 Beach Boulevard, # G-
13 415, in Stanton, California.

14 124) On or about August 21, 1990, in the Central
15 District of California, defendant DEBRA LEE STINSON cashed the
16 \$500 money order she had picked up.

17 125) On or about August 21, 1990, in the Central
18 District of California, defendant DEBRA LEE STINSON visited
19 defendant JOHN WILLIAM STINSON in the Los Angeles County Jail.

20 126) On or about August 22, 1990, in the Central
21 District of California, defendant JOHN WILLIAM STINSON told
22 Russell Graham that he had received \$500 that Graham had sent to
23 defendant DEBRA LEE STINSON and that he would supply Graham with
24 heroin on August 24, 1990.

25 Murder of Arva Lee Ray

26 127) In or before August 1989, in the Central District
27 of California, defendants GLENN RICHARD FILKINS and EDGAR WESLEY
28 HEVLE, and others, agreed among themselves to seek permission

1 from the Federal Commission to murder Aryan Brotherhood member
2 Arva Lee Ray for failure to follow the rules of the Aryan
3 Brotherhood.

4 128) In or before August 1989, the members of the
5 Federal Commission, including defendants BARRY BYRON MILLS and
6 TYLER DAVIS BINGHAM, authorized the murder of Arva Lee Ray.

7 129) In or about August 1989, in the Central District
8 of California and elsewhere, defendants BARRY BYRON MILLS and
9 TYLER DAVIS BINGHAM informed defendant RONALD BOYD SLOCUM that
10 they had authorized the murder of Arva Lee Ray.

11 130) In or about August 1989, in the Central District
12 of California, defendant RONALD BOYD SLOCUM informed a member of
13 the conspiracy who was incarcerated with Arva Lee Ray that the
14 Federal Commission had authorized Ray's murder.

15 131) In or about August 1989, in the Central District
16 of California, defendants GLENN RICHARD FILKINS and EDGAR WESLEY
17 HEVLE, and others, decided that defendant GLENN RICHARD FILKINS
18 would murder Arva Lee Ray.

19 132) On or about August 9, 1989, in the Central
20 District of California, defendant GLENN RICHARD FILKINS asked
21 Aryan Brotherhood associate Thomas Miller to help him murder Arva
22 Lee Ray.

23 133) On or about August 9, 1989, in the Central
24 District of California, defendant GLENN RICHARD FILKINS attempted
25 to murder Arva Lee Ray by giving him an overdose of heroin.

26 134) On or about August 9, 1989, in the Central
27 District of California, defendant GLENN RICHARD FILKINS murdered
28 Arva Lee Ray by strangling him.

1 Murder of Arthur Ruffo

2 135) In or before 1990, in the Central District of
3 California and elsewhere, the members of the California
4 Commission, including defendants JOHN WILLIAM STINSON, RICHARD
5 LLOYD TERFLINGER, and ROBERT LEE GRIFFIN, decided that Aryan
6 Brotherhood member Arthur Ruffo was to be murdered.

7 136) In or about 1990, in the Central District of
8 California, defendant EDWARD TYLER BURNETT told Aryan Brotherhood
9 member Brian Healy that the California Commission had ordered
10 that Arthur Ruffo be murdered.

11 137) In or about August 1995, defendants JOHN WILLIAM
12 STINSON, RICHARD LLOYD TERFLINGER, and DAVID ALLEN CHANCE ordered
13 Brian Healy to murder Arthur Ruffo.

14 138) On or about February 5, 1996, defendant RICHARD
15 LLOYD TERFLINGER sent a message to Brian Healy ordering him to
16 murder Arthur Ruffo.

17 139) On or about February 7, 1996, Brian Healy murdered
18 Arthur Ruffo by strangling him to death.

19 140) In or about November 1997, defendant ROBERT LEE
20 GRIFFIN told Brian Healy that he was among those who ordered that
21 Arthur Ruffo be murdered.

22 Conspiracy to Murder Frank Ruopoli

23 141) In or before June 1991, in the Central District of
24 California and elsewhere, members of the California faction of
25 the Aryan Brotherhood asked defendant RONALD BOYD SLOCUM to
26 transmit a message to the federal faction of the Aryan
27 Brotherhood saying that Frank Ruopoli was to be murdered for
28 having provided information about defendant JOHN WILLIAM STINSON

1 to law enforcement authorities.

2 142) In or before June 1991, in the Central District of
3 California and elsewhere, defendant RONALD BOYD SLOCUM sent a
4 message to defendant BARRY BYRON MILLS saying that Frank Ruopoli
5 was to be murdered.

6 143) In or about June 1991, defendant BARRY BYRON MILLS
7 told Aryan Brotherhood member Kevin Roach to contact members of
8 the federal faction of the Aryan Brotherhood and tell them to try
9 to locate Frank Ruopoli so that Ruopoli could be murdered.

10 144) In or about 1995, defendant BARRY BYRON MILLS told
11 Aryan Brotherhood member Eugene Bentley that the California
12 Commission wanted Frank Ruopoli murdered.

13 145) In or about April 1995, Arthur Ruffo told Aryan
14 Brotherhood member Brian Healy that Frank Ruopoli was to be
15 murdered because he had testified in court against defendant JOHN
16 WILLIAM STINSON.

17 146) In or about June 1998, Aryan Brotherhood member
18 Frederick Frakes gave Kevin Roach a telephone number to be used
19 in tracking down Frank Ruopoli.

20 Conspiracy to Distribute Narcotics at USP Leavenworth

21 147) From 1992 to 1993, on multiple occasions,
22 defendant MARK ALAN NYQUIST arranged to have Aryan Brotherhood
23 associate Dewey Lee smuggle narcotics into the United States
24 Penitentiary at Leavenworth, Kansas.

25 148) From 1992 to 1993, on multiple occasions,
26 defendant RONALD BOYD SLOCUM provided heroin to Mary Bentley to
27 be smuggled into the United States Penitentiary at Leavenworth,
28 Kansas.

1 149) From 1992 to 1993, on multiple occasions, Mary
2 Bentley smuggled heroin into the United States Penitentiary at
3 Leavenworth, Kansas.

4 150) On or about August 22, 1992, in the Central
5 District of California and elsewhere, defendant RONALD BOYD
6 SLOCUM spoke on the telephone with Mary Bentley in order to
7 arrange a narcotics transaction in which the narcotics would
8 eventually be smuggled into the United States Penitentiary at
9 Leavenworth, Kansas.

10 151) On or about August 24, 1992, in the Central
11 District of California and elsewhere, defendant RONALD BOYD
12 SLOCUM spoke on the telephone with Mary Bentley in order to
13 arrange a narcotics transaction in which the narcotics would
14 eventually be smuggled into the United States Penitentiary at
15 Leavenworth, Kansas.

16 152) On or about August 25, 1992, in the Central
17 District of California and elsewhere, defendant RONALD BOYD
18 SLOCUM spoke on the telephone with Mary Bentley in order to
19 arrange a narcotics transaction in which the narcotics would
20 eventually be smuggled into the United States Penitentiary at
21 Leavenworth, Kansas.

22 153) On or about October 4, 1992, in the Central
23 District of California and elsewhere, defendant RONALD BOYD
24 SLOCUM spoke on the telephone with Mary Bentley in order to
25 arrange a narcotics transaction in which the narcotics would
26 eventually be smuggled into the United States Penitentiary at
27 Leavenworth, Kansas.

28 154) On or about October 6, 1992, in the Central

1 District of California and elsewhere, defendant RONALD BOYD
2 SLOCUM spoke on the telephone with Mary Bentley in order to
3 arrange a narcotics transaction in which the narcotics would
4 eventually be smuggled into the United States Penitentiary at
5 Leavenworth, Kansas.

6 155) On or about November 12, 1992, in the Central
7 District of California and elsewhere, defendant RONALD BOYD
8 SLOCUM spoke on the telephone with Mary Bentley in order to
9 arrange a narcotics transaction in which the narcotics would
10 eventually be smuggled into the United States Penitentiary at
11 Leavenworth, Kansas.

12 156) On or about November 13, 1992, in the Central
13 District of California and elsewhere, defendant RONALD BOYD
14 SLOCUM spoke on the telephone with Mary Bentley in order to
15 arrange a narcotics transaction in which the narcotics would
16 eventually be smuggled into the United States Penitentiary at
17 Leavenworth, Kansas.

18 157) On or about January 1, 1993, in the Central
19 District of California and elsewhere, defendant RONALD BOYD
20 SLOCUM spoke on the telephone with Mary Bentley in order to
21 arrange a narcotics transaction in which the narcotics would
22 eventually be smuggled into the United States Penitentiary at
23 Leavenworth, Kansas.

24 158) On or about January 9, 1993, in the Central
25 District of California and elsewhere, defendant RONALD BOYD
26 SLOCUM spoke on the telephone with Mary Bentley in order to
27 arrange a narcotics transaction in which the narcotics would
28 eventually be smuggled into the United States Penitentiary at

1 Leavenworth, Kansas.

2 159) On or about January 20, 1993, in the Central
3 District of California and elsewhere, defendant RONALD BOYD
4 SLOCUM spoke on the telephone with Mary Bentley in order to
5 arrange a narcotics transaction in which the narcotics would
6 eventually be smuggled into the United States Penitentiary at
7 Leavenworth, Kansas.

8 160) In or about February 1993, defendant MARK ALAN
9 NYQUIST took command of heroin trafficking by Aryan Brotherhood
10 members and associates at the United States Penitentiary at
11 Leavenworth, Kansas.

12 161) On or about May 3, 1993, in the Central District
13 of California and elsewhere, defendant RONALD BOYD SLOCUM spoke
14 on the telephone with Mary Bentley in order to arrange a
15 narcotics transaction in which the narcotics would eventually be
16 smuggled into the United States Penitentiary at Leavenworth,
17 Kansas.

18 162) On or about May 17, 1993, in the Central District
19 of California and elsewhere, defendant RONALD BOYD SLOCUM spoke
20 on the telephone with Mary Bentley in order to arrange a
21 narcotics transaction in which the narcotics would eventually be
22 smuggled into the United States Penitentiary at Leavenworth,
23 Kansas.

24 163) On or about July 3, 1993, in the Central District
25 of California and elsewhere, defendant RONALD BOYD SLOCUM spoke
26 on the telephone with Mary Bentley in order to arrange a
27 narcotics transaction in which the narcotics would eventually be
28 smuggled into the United States Penitentiary at Leavenworth,

1 Kansas.

2 164) On or about July 14, 1993, in the Central District
3 of California and elsewhere, defendant RONALD BOYD SLOCUM spoke
4 on the telephone with Mary Bentley in order to arrange a
5 narcotics transaction in which the narcotics would eventually be
6 smuggled into the United States Penitentiary at Leavenworth,
7 Kansas.

8 165) On or about July 29, 1993, in the Central District
9 of California and elsewhere, defendant RONALD BOYD SLOCUM spoke
10 on the telephone with Mary Bentley in order to arrange a
11 narcotics transaction in which the narcotics would eventually be
12 smuggled into the United States Penitentiary at Leavenworth,
13 Kansas.

14 166) On or about August 17, 1993, in the Central
15 District of California and elsewhere, defendant RONALD BOYD
16 SLOCUM spoke on the telephone with Mary Bentley in order to
17 arrange a narcotics transaction in which the narcotics would
18 eventually be smuggled into the United States Penitentiary at
19 Leavenworth, Kansas.

20 167) On or about August 20, 1993, in the Central
21 District of California and elsewhere, defendant RONALD BOYD
22 SLOCUM spoke on the telephone with Mary Bentley in order to
23 arrange a narcotics transaction in which the narcotics would
24 eventually be smuggled into the United States Penitentiary at
25 Leavenworth, Kansas.

26 168) On or about September 10, 1993, in the Central
27 District of California and elsewhere, defendant RONALD BOYD
28 SLOCUM spoke on the telephone with Mary Bentley in order to

1 arrange a narcotics transaction in which the narcotics would
2 eventually be smuggled into the United States Penitentiary at
3 Leavenworth, Kansas.

4 169) On or about October 18, 1993, in the Central
5 District of California and elsewhere, defendant RONALD BOYD
6 SLOCUM spoke on the telephone with Mary Bentley in order to
7 arrange a narcotics transaction in which the narcotics would
8 eventually be smuggled into the United States Penitentiary at
9 Leavenworth, Kansas.

10 170) On or about October 24, 1993, in the Central
11 District of California and elsewhere, defendant RONALD BOYD
12 SLOCUM spoke on the telephone with Mary Bentley in order to
13 arrange a narcotics transaction in which the narcotics would
14 eventually be smuggled into the United States Penitentiary at
15 Leavenworth, Kansas.

16 171) On or about December 28, 1993, in the Central
17 District of California and elsewhere, defendant RONALD BOYD
18 SLOCUM spoke on the telephone with Mary Bentley in order to
19 arrange a narcotics transaction in which the narcotics would
20 eventually be smuggled into the United States Penitentiary at
21 Leavenworth, Kansas.

22 172) On or about February 12, 1994, in the Central
23 District of California and elsewhere, defendant RONALD BOYD
24 SLOCUM spoke on the telephone with Mary Bentley in order to
25 arrange a narcotics transaction in which the narcotics would
26 eventually be smuggled into the United States Penitentiary at
27 Leavenworth, Kansas.

28 173) On or about June 3, 1994, in the Central District

1 of California and elsewhere, defendant RONALD BOYD SLOCUM spoke
2 on the telephone with Mary Bentley in order to arrange a
3 narcotics transaction in which the narcotics would eventually be
4 smuggled into the United States Penitentiary at Leavenworth,
5 Kansas.

6 174) From October 1994 to September 1995, on multiple
7 occasions, defendant MICHAEL PATRICK McELHINEY ordered Aryan
8 Brotherhood associate Allan Hawley to distribute heroin within
9 the United States Penitentiary at Leavenworth, Kansas.

10 175) On or about October 4, 1994, in the Central
11 District of California and elsewhere, defendant RONALD BOYD
12 SLOCUM spoke on the telephone with Mary Bentley in order to
13 arrange a narcotics transaction in which the narcotics would
14 eventually be smuggled into the United States Penitentiary at
15 Leavenworth, Kansas.

16 176) In or about November 1994, defendant MICHAEL
17 PATRICK McELHINEY gave Aryan Brotherhood associate Danny
18 McPheeters a quarter of a gram of heroin to use to pay the winner
19 of a poker game.

20 177) In or about December 1994, defendant MICHAEL
21 PATRICK McELHINEY ordered Danny McPheeters to find inmates to
22 smuggle narcotics into the United States Penitentiary at
23 Leavenworth, Kansas.

24 178) On or about February 1, 1995, in the Central
25 District of California and elsewhere, defendant RONALD BOYD
26 SLOCUM spoke on the telephone with Mary Bentley in order to
27 arrange a narcotics transaction in which the narcotics would
28 eventually be smuggled into the United States Penitentiary at

1 Leavenworth, Kansas.

2 179) On or about February 17, 1995, in the Central
3 District of California and elsewhere, defendant RONALD BOYD
4 SLOCUM spoke on the telephone with Mary Bentley in order to
5 arrange a narcotics transaction in which the narcotics would
6 eventually be smuggled into the United States Penitentiary at
7 Leavenworth, Kansas.

8 180) In or about March 1995, defendant MICHAEL PATRICK
9 McELHINEY asked Walter Moles to smuggle heroin into the United
10 States Penitentiary at Leavenworth, Kansas.

11 181) On or about March 22, 1995, Mary Anne Bevaret
12 brought heroin to Gregory Storey in the visiting room at the
13 United States Penitentiary at Leavenworth, Kansas.

14 182) On or about March 22, 1995, Gregory Storey
15 swallowed the heroin that Mary Anne Bevaret had brought to him at
16 the United States Penitentiary at Leavenworth, Kansas.

17 183) On or about March 22, 1995, Gregory Storey
18 smuggled the heroin he had swallowed from the visiting room to
19 the interior of the United States Penitentiary at Leavenworth,
20 Kansas.

21 184) On or about March 24, 1995, defendant MICHAEL
22 PATRICK McELHINEY provided Aryan Brotherhood associate Charles
23 Leger with heroin and ordered Leger to package the heroin so that
24 it could be sold to inmates.

25 185) In or about May 1995, defendants MICHAEL PATRICK
26 McELHINEY and DAVID MICHAEL SAHAKIAN asked Charles Moorman to
27 have money sent to a heroin smuggler as advance payment for
28 smuggling heroin into the United States Penitentiary at

1 Leavenworth, Kansas.

2 186) On or about May 7, 1995, in the Central District
3 of California and elsewhere, defendant RONALD BOYD SLOCUM spoke
4 on the telephone with Mary Bentley in order to arrange a
5 narcotics transaction in which the narcotics would eventually be
6 smuggled into the United States Penitentiary at Leavenworth,
7 Kansas.

8 187) In or about June 1995, defendant MICHAEL PATRICK
9 McELHINEY packaged heroin that had been smuggled into the United
10 States Penitentiary at Leavenworth, Kansas.

11 188) On or about June 26, 1995, defendant MARK ALAN
12 NYQUIST recruited Walter Moles to smuggle narcotics into the
13 United States Penitentiary at Leavenworth, Kansas.

14 189) In or about July 1995, defendants MICHAEL PATRICK
15 McELHINEY and DAVID MICHAEL SAHAKIAN took command of heroin
16 trafficking by Aryan Brotherhood members and associates at the
17 United States Penitentiary at Leavenworth, Kansas.

18 190) In or about July 1995, defendant MICHAEL PATRICK
19 McELHINEY arranged to have heroin sent to the home of Walter
20 Moles' father.

21 191) On or about July 21, 1995, Walter Moles' father
22 brought the heroin he had received to the visiting room at the
23 United States Penitentiary at Leavenworth, Kansas, and gave the
24 heroin to Walter Moles.

25 192) On or about July 21, 1995, Walter Moles
26 transported the heroin he had received from his father from the
27 visiting room at the United States Penitentiary at Leavenworth,
28 Kansas, to the interior of the prison.

1 193) On or about July 21, 1995, Walter Moles gave the
2 heroin that he had brought into the United States Penitentiary at
3 Leavenworth, Kansas, to Aryan Brotherhood associate Michael Hunt.

4 194) On or about July 24, 1995, Michael Hunt gave the
5 heroin that Walter Moles had brought into the United States
6 Penitentiary at Leavenworth, Kansas, to defendant MICHAEL PATRICK
7 McELHINEY.

8 195) On or about July 25, 1995, defendant MICHAEL
9 PATRICK McELHINEY gave approximately a quarter of a gram of
10 heroin to Aryan Brotherhood associate Michael Witcher to sell to
11 another inmate.

12 196) On or about July 29, 1995, in the Central District
13 of California and elsewhere, defendant RONALD BOYD SLOCUM spoke
14 on the telephone with Mary Bentley in order to arrange a
15 narcotics transaction in which the narcotics would eventually be
16 smuggled into the United States Penitentiary at Leavenworth,
17 Kansas.

18 197) On or about August 19, 1995, Aryan Brotherhood
19 associate Steven Ritter, at the request of defendant MICHAEL
20 PATRICK McELHINEY, transported heroin to defendant DAVID MICHAEL
21 SAHAKIAN in the segregated housing unit at the United States
22 Penitentiary at Leavenworth, Kansas.

23 198) In or about September 1995, Aryan Brotherhood
24 associate James Pratt brought heroin into the segregated housing
25 unit at the United States Penitentiary at Leavenworth, Kansas, on
26 behalf of defendants MICHAEL PATRICK McELHINEY and DAVID MICHAEL
27 SAHAKIAN.

28 199) In or about September 1995, Danny McPheeters

1 brought heroin into the segregated housing unit at the United
2 States Penitentiary at Leavenworth, Kansas, on behalf of
3 defendants MICHAEL PATRICK McELHINEY and DAVID MICHAEL SAHAKIAN.

4 200) On or before September 18, 1995, defendant DAVID
5 MICHAEL SAHAKIAN sent a message to Allan Hawley instructing
6 Hawley on the procedures to be used when sending secret messages
7 to members or associates of the Aryan Brotherhood within the
8 United States Penitentiary at Leavenworth, Kansas.

9 201) On or about September 18, 1995, defendant DAVID
10 MICHAEL SAHAKIAN sent a message to Allan Hawley instructing
11 Hawley to have heroin smuggled into the segregated housing unit
12 at the United States Penitentiary at Leavenworth, Kansas.

13 202) On or before September 21, 1995, defendant MICHAEL
14 PATRICK McELHINEY sent a message to Allan Hawley complaining that
15 someone had stolen heroin belonging to defendant MICHAEL PATRICK
16 McELHINEY.

17 203) On or before September 21, 1995, defendant MICHAEL
18 PATRICK McELHINEY sent a message to Allan Hawley instructing
19 Hawley not to share heroin with inmates not associated with the
20 Aryan Brotherhood.

21 204) On or before September 21, 1995, defendant MICHAEL
22 PATRICK McELHINEY sent a message to Allan Hawley instructing
23 Hawley to send him some heroin.

24 205) In or about November 1995, defendant MICHAEL
25 PATRICK McELHINEY received heroin that had been smuggled into the
26 United States Penitentiary at Leavenworth, Kansas.

27 Attempted Murder of Ismael Benitez-Mendez

28 206) In or before January 1992, defendant TYLER DAVIS

1 BINGHAM ordered defendant STEVE LOREN SCOTT to murder Ismael
2 Benitez-Mendez because Benitez-Mendez had assaulted an Aryan
3 Brotherhood associate.

4 207) On or about January 4, 1992, defendant STEVE LOREN
5 SCOTT attempted to murder Ismael Benitez-Mendez by stabbing him.

6 Murder of William McKinney

7 208) In or before December 1992, the members of the
8 Federal Commission, including defendants BARRY BYRON MILLS and
9 TYLER DAVIS BINGHAM, authorized the murder of Aryan Brotherhood
10 member William McKinney for failure to follow the rules of the
11 Aryan Brotherhood.

12 209) In or before December 1992, in the Central
13 District of California and elsewhere, the members of the Federal
14 Commission, including defendants BARRY BYRON MILLS and TYLER
15 DAVIS BINGHAM, ordered defendant RONALD BOYD SLOCUM to inform
16 Aryan Brotherhood members at the United States Penitentiary at
17 Lompoc, California, that the Federal Commission had authorized
18 the murder of William McKinney.

19 210) In or before December 1992, in the Central
20 District of California, defendant RONALD BOYD SLOCUM informed a
21 member of the Aryan Brotherhood at the United States Penitentiary
22 at Lompoc, California, that the Federal Commission had authorized
23 the murder of William McKinney.

24 211) On or about December 28, 1992, in the Central
25 District of California, a member of the conspiracy murdered
26 William McKinney by hitting him over the head with a metal bar,
27 resulting in McKinney's death on January 8, 1993.

28

1 Attempted Murder of David Newman

2 212) In or about June 1994, members of the Aryan
3 Brotherhood ordered Richard Bernard to murder David Newman
4 because Newman had failed to follow the orders of the Aryan
5 Brotherhood.

6 213) On or about June 21, 1994, Richard Bernard
7 attempted to murder David Newman by stabbing him.

8 Conspiracy to Murder Chris Cecil

9 214) On or about June 10, 1994, defendant JOHN WILLIAM
10 STINSON ordered Aryan Brotherhood member Jeffrey Rhodes to murder
11 Aryan Brotherhood associate Chris Cecil because Cecil had failed
12 to follow an order to commit a murder on behalf of the Aryan
13 Brotherhood.

14 215) Between June 10, 1994, and June 17, 1994, Aryan
15 Brotherhood member Paul Schneider made a knife for Jeffrey Rhodes
16 to use in murdering Chris Cecil.

17 216) On or about June 17, 1994, Paul Schneider brought
18 the knife he had made, concealed inside a manila envelope, to the
19 law library at Pelican Bay State Prison in Crescent City,
20 California.

21 217) On or about June 17, 1994, Paul Schneider, in the
22 law library at Pelican Bay State Prison in Crescent City,
23 California, passed the manila envelope containing the knife he
24 had made to another inmate, who passed the manila envelope to
25 Jeffrey Rhodes.

26 218) On or about June 17, 1994, defendants JOHN WILLIAM
27 STINSON, RICHARD LLOYD TERFLINGER, and DAVID ALLEN CHANCE
28 instructed Jeffrey Rhodes on how to murder Chris Cecil and make

1 the murder appear to have been committed in self defense.

2 Murder of Charles Leger

3 219) In or about August 1995, defendant DAVID MICHAEL
4 SAHAKIAN told Aryan Brotherhood associate Allan Hawley that he
5 wanted Hawley to murder an informant at the United States
6 Penitentiary at Leavenworth, Kansas.

7 220) In or about August 1995, defendant DAVID MICHAEL
8 SAHAKIAN told Allan Hawley that he would send Hawley a knife to
9 use in murdering the informant.

10 221) In or about August 1995, defendant DAVID MICHAEL
11 SAHAKIAN sent a note to defendant MICHAEL PATRICK McELHINEY
12 saying that he wanted to have Aryan Brotherhood associate Charles
13 Leger murdered.

14 222) In or about August 1995, defendant MICHAEL PATRICK
15 McELHINEY selected Gregory Storey to murder Charles Leger.

16 223) In or about August 1995, defendant MICHAEL PATRICK
17 McELHINEY sent a note to defendant DAVID MICHAEL SAHAKIAN
18 agreeing that Charles Leger should be murdered.

19 224) In or about August 1995, defendant DAVID MICHAEL
20 SAHAKIAN ordered Gregory Storey to murder Charles Leger.

21 225) In or about August 1995, defendant DAVID MICHAEL
22 SAHAKIAN provided Gregory Storey with a knife to be used to
23 murder Charles Leger.

24 226) On or about August 25, 1995, Gregory Storey
25 murdered Charles Leger by stabbing him to death.

26 227) In or about 1996 and 1997, defendants MICHAEL
27 PATRICK McELHINEY and DAVID MICHAEL SAHAKIAN ordered a number of
28 other inmates to testify falsely that Gregory Storey killed

1 Charles Leger in self defense.

2 Distribution of Proceeds of Narcotics Trafficking

3 228) In or about August 1995, defendants TYLER DAVIS
4 BINGHAM, MICHAEL PATRICK McELHINEY, and DAVID MICHAEL SAHAKIAN
5 arranged to have the proceeds of narcotics trafficking sent to
6 defendant SEAN MATTHEW DARCY.

7 229) On or about August 31, 1995, defendant SEAN
8 MATTHEW DARCY mailed a money order in the amount of \$105 to Aryan
9 Brotherhood member Eugene Bentley at the Administrative Maximum
10 Facility at Florence, Colorado.

11 230) On or about August 31, 1995, defendant SEAN
12 MATTHEW DARCY mailed a money order in the amount of \$105 to
13 defendant GLENN RICHARD FILKINS at the Administrative Maximum
14 Facility at Florence, Colorado.

15 231) On or about August 31, 1995, defendant SEAN
16 MATTHEW DARCY mailed a money order in the amount of \$105 to Aryan
17 Brotherhood member Lawrence Klaker at the Administrative Maximum
18 Facility at Florence, Colorado.

19 232) On or about August 31, 1995, defendant SEAN
20 MATTHEW DARCY mailed a money order in the amount of \$105 to
21 defendant STEVEN WILLIAM HICKLIN at the Administrative Maximum
22 Facility at Florence, Colorado.

23 233) On or about August 31, 1995, defendant SEAN
24 MATTHEW DARCY mailed a money order in the amount of \$105 to Aryan
25 Brotherhood member John Greschner at the Administrative Maximum
26 Facility at Florence, Colorado.

27 234) On or about August 31, 1995, defendant SEAN
28 MATTHEW DARCY mailed a money order in the amount of \$105 to

1 defendant CHRISTOPHER OVERTON GIBSON at the Administrative
2 Maximum Facility at Florence, Colorado.

3 235) On or about August 31, 1995, defendant SEAN
4 MATTHEW DARCY mailed a money order in the amount of \$105 to
5 defendant STEVE LOREN SCOTT at the Administrative Maximum
6 Facility at Florence, Colorado.

7 236) On or about August 31, 1995, defendant SEAN
8 MATTHEW DARCY mailed a money order in the amount of \$105 to Aryan
9 Brotherhood member Kurt King at the Administrative Maximum
10 Facility at Florence, Colorado.

11 237) On or about August 31, 1995, defendant SEAN
12 MATTHEW DARCY mailed a money order in the amount of \$105 to Aryan
13 Brotherhood member Kirk Smyth at the Administrative Maximum
14 Facility at Florence, Colorado.

15 238) On or about August 31, 1995, defendant SEAN
16 MATTHEW DARCY mailed a money order in the amount of \$105 to Aryan
17 Brotherhood member Norman Matthews at the Administrative Maximum
18 Facility at Florence, Colorado.

19 239) On or about August 31, 1995, defendant SEAN
20 MATTHEW DARCY mailed a money order in the amount of \$105 to
21 defendant TYLER DAVIS BINGHAM at the Administrative Maximum
22 Facility at Florence, Colorado.

23 Conspiracy to Murder Walter Johnson

24 240) In or about July 1996, organized crime leader John
25 Gotti told defendants MICHAEL PATRICK McELHINEY and DAVID MICHAEL
26 SAHAKIAN that he would pay the Aryan Brotherhood to murder Walter
27 Johnson, who was at the time an inmate at the United States
28 Penitentiary at Marion, Illinois.

1 241) In or about August 1996, defendant MICHAEL PATRICK
2 McELHINEY told Aryan Brotherhood associate Steven Ritter that
3 Ritter was to murder Walter Johnson if given the opportunity
4 because John Gotti would pay to have Johnson murdered.

5 242) In or about September 1996, defendant MICHAEL
6 PATRICK McELHINEY told Aryan Brotherhood associate Dewey Lee that
7 Lee was to murder Walter Johnson if given the opportunity because
8 John Gotti would pay to have Johnson murdered.

9 243) In or before March 1997, defendants MICHAEL
10 PATRICK McELHINEY and DAVID MICHAEL SAHAKIAN ordered defendant
11 JESSE ANTONIO VAN METER and Aryan Brotherhood associate Michael
12 Wagner to take a message to defendant BARRY BYRON MILLS saying
13 that John Gotti had offered to pay the Aryan Brotherhood to
14 murder Walter Johnson.

15 244) In or before September 1997, defendant JESSE
16 ANTONIO VAN METER and Michael Wagner delivered the message to
17 defendant BARRY BYRON MILLS that John Gotti had offered to pay
18 the Aryan Brotherhood to murder Walter Johnson.

19 245) In or about September 1997, defendant JOSEPH
20 PRINCIPE, who was at the time a correctional officer at the
21 Administrative Maximum Facility at Florence, Colorado, arranged
22 to have defendant BARRY BYRON MILLS and Aryan Brotherhood member
23 Kevin Roach placed on recreation in the same area so that
24 defendant BARRY BYRON MILLS and Roach could communicate about
25 Aryan Brotherhood affairs.

26 246) In or about September 1997, defendant BARRY BYRON
27 MILLS told Kevin Roach that he was to notify all Aryan
28 Brotherhood members who could be contacted that Walter Johnson

1 was to be murdered at all costs.

2 247) In or about September 1997, defendant JOSEPH
3 PRINCIPIE arranged to have defendant BARRY BYRON MILLS and Aryan
4 Brotherhood member Eugene Bentley placed on recreation in the
5 same area so that defendant BARRY BYRON MILLS and Bentley could
6 communicate about Aryan Brotherhood affairs.

7 248) In or about September 1997, defendant BARRY BYRON
8 MILLS told Eugene Bentley that he was to notify all Aryan
9 Brotherhood members who could be contacted that Walter Johnson
10 was to be murdered at all costs.

11 Race War with Black Inmates

12 249) In or about December 1996, defendant DAVID MICHAEL
13 SAHAKIAN ordered Aryan Brotherhood associate Michael Wagner to
14 assault a black inmate named Butch Johnson because Johnson had
15 assaulted a white inmate.

16 250) On or about December 18, 1996, Michael Wagner
17 assaulted Butch Johnson.

18 251) In or about January 1997, defendant EDGAR WESLEY
19 HEVLE sent a message to defendants MICHAEL PATRICK McELHINEY and
20 DAVID MICHAEL SAHAKIAN saying that there had been racial problems
21 at the United States Penitentiary at Lewisburg, Pennsylvania, and
22 that white inmates at the United States Penitentiary at Marion,
23 Illinois, should begin making knives in order to commit acts of
24 violence against black inmates.

25 252) In or about January 1997, defendants MICHAEL
26 PATRICK McELHINEY and DAVID MICHAEL SAHAKIAN ordered white
27 inmates at the United States Penitentiary at Marion, Illinois, to
28 murder black inmates in retaliation for assaults on white inmates

1 committed by black inmates.

2 253) In or about January 1997, defendant DAVID MICHAEL
3 SAHAKIAN made a "hit list" of black inmates at the United States
4 Penitentiary at Marion, Illinois, who were to be murdered.

5 254) In or about February 1997, defendant MICHAEL
6 PATRICK McELHINEY ordered Aryan Brotherhood associate Raymond
7 Oechsle to smuggle a knife to be used in the war on black inmates
8 from one housing unit to another at the United States
9 Penitentiary at Marion, Illinois.

10 255) In or about February 1997, defendant MICHAEL
11 PATRICK McELHINEY provided a knife to Aryan Brotherhood associate
12 Ricky Williams to be used to attempt to kill a black inmate.

13 256) On or about February 14, 1997, defendant DAVID
14 MICHAEL SAHAKIAN attempted to murder Darryl Bailey by helping two
15 inmates stab Bailey.

16 257) In or about March 1997, defendants MICHAEL PATRICK
17 McELHINEY and DAVID MICHAEL SAHAKIAN ordered defendant JESSE
18 ANTONIO VAN METER and Michael Wagner to take a message to
19 defendant BARRY BYRON MILLS saying that the Aryan Brotherhood
20 members at the United States Penitentiary at Marion, Illinois,
21 had gone to war with the DC Blacks prison gang.

22 258) In or about March 1997, defendant DAVID MICHAEL
23 SAHAKIAN ordered Michael Wagner to take a message to defendant
24 BARRY BYRON MILLS listing the names of black inmates who were to
25 be killed.

26 259) In or about March 1997, defendant BARRY BYRON
27 MILLS asked defendant RONALD BOYD SLOCUM to contact defendants
28 MICHAEL PATRICK McELHINEY and DAVID MICHAEL SAHAKIAN to determine

1 whether inmate Khalif Mujahid should be murdered for his role in
2 the conflict between the Aryan Brotherhood and the DC Blacks.

3 260) In or about April 1997, defendant DAVID MICHAEL
4 SAHAKIAN placed Terry Walker's name on the "hit list" of black
5 inmates to be murdered.

6 261) In or about April 1997, defendant DAVID MICHAEL
7 SAHAKIAN issued an order to white inmates at the United States
8 Penitentiary at Marion, Illinois, that any black inmate who used
9 violence against a white inmate was to be murdered.

10 262) On or about April 14, 1997, in the Central
11 District of California and elsewhere, defendant RONALD BOYD
12 SLOCUM told defendant BARRY BYRON MILLS during a telephone call
13 that black inmates had attacked Aryan Brotherhood members at the
14 United States Penitentiary at Marion, Illinois.

15 263) In or before May 1997, defendants MICHAEL PATRICK
16 McELHINEY and DAVID MICHAEL SAHAKIAN advised defendant RONALD
17 BOYD SLOCUM that Khalif Mujahid should be murdered for his role
18 in the conflict with the DC Blacks.

19 264) In or before May 1997, defendant RONALD BOYD
20 SLOCUM sent word to defendant BARRY BYRON MILLS that Khalif
21 Mujahid should be murdered.

22 265) On or before May 5, 1997, defendant BARRY BYRON
23 MILLS attempted to manufacture a weapon, to be used to murder
24 Khalif Mujahid, using material taken from a light fixture in his
25 prison cell.

26 266) On or about June 11, 1997, Aryan Brotherhood
27 member Ronald Yandell mailed a letter to Patty Yandell asking her
28 to have defendant MARTY LAINE FOAKES inform defendant BARRY BYRON

1 MILLS that Ronald Yandell and Michael Wagner were prepared to go
2 to war against the DC Blacks.

3 267) On or about June 30, 1997, defendant BARRY BYRON
4 MILLS sent a letter to defendant JOANNE LOUISE GUTHRIE asking her
5 to have Patty Yandell inform Ronald Yandell that defendant BARRY
6 BYRON MILLS was going to have Prince Johnson murdered.

7 268) In or about July 1997, defendants MICHAEL PATRICK
8 McELHINEY and DAVID MICHAEL SAHAKIAN ordered Aryan Brotherhood
9 associate Dewey Lee and Raymond Oechsle to murder Wayne Alton if
10 given the opportunity.

11 269) In or before August 1997, defendant JESSE ANTONIO
12 VAN METER and Michael Wagner delivered the message from
13 defendants MICHAEL PATRICK McELHINEY and DAVID MICHAEL SAHAKIAN
14 to defendant BARRY BYRON MILLS that the Aryan Brotherhood members
15 at the United States Penitentiary at Marion, Illinois, had gone
16 to war with the DC Blacks.

17 270) In or before August 1997, defendants BARRY BYRON
18 MILLS and CHRISTOPHER OVERTON GIBSON told Aryan Brotherhood
19 associate Christopher Risk to take a message to defendant TYLER
20 DAVIS BINGHAM asking for approval of a plan to "go to war" with
21 the DC Blacks.

22 271) In or before August 1997, Christopher Risk gave
23 the message from defendants BARRY BYRON MILLS and CHRISTOPHER
24 OVERTON GIBSON to Aryan Brotherhood member Norman Matthews, who
25 in turn was to give the message to defendant TYLER DAVIS BINGHAM.

26 272) In or before August 1997, Norman Matthews
27 delivered the message from defendants BARRY BYRON MILLS and
28 CHRISTOPHER OVERTON GIBSON to defendant TYLER DAVIS BINGHAM.

1 273) In or before August 1997, in the Central District
2 of California and elsewhere, defendant TYLER DAVIS BINGHAM sent a
3 message to defendant RONALD BOYD SLOCUM ordering defendant RONALD
4 BOYD SLOCUM to notify Aryan Brotherhood member Allen Benton that
5 members of the Aryan Brotherhood at the United States
6 Penitentiary at Lewisburg, Pennsylvania, were to murder black
7 inmates at that institution.

8 274) In or about August 1997, defendant TYLER DAVIS
9 BINGHAM ordered Aryan Brotherhood member Jonathan McGinley to
10 send a coded message to Aryan Brotherhood member Kevin Roach
11 saying that Roach was to murder Clarence Hinnant.

12 275) On or about August 17, 1997, defendant TYLER DAVIS
13 BINGHAM attempted to send a message to defendant JOANNE LOUISE
14 GUTHRIE, to be delivered to defendant BARRY BYRON MILLS,
15 approving the decision to "go to war" against the DC Blacks.

16 276) On or about August 23, 1997, in the Central
17 District of California and elsewhere, defendant RONALD BOYD
18 SLOCUM mailed a letter to Allen Benton containing a message
19 written in "invisible ink" saying that defendant TYLER DAVIS
20 BINGHAM had issued an order that Aryan Brotherhood members were
21 to go to war against the DC Blacks.

22 277) On or about August 25, 1997, in the Central
23 District of California and elsewhere, defendant RONALD BOYD
24 SLOCUM mailed a card to defendant BARRY BYRON MILLS saying that
25 defendant RONALD BOYD SLOCUM had received the message from
26 defendant TYLER DAVIS BINGHAM about the need to kill black
27 inmates at the United States Penitentiary at Lewisburg,
28 Pennsylvania.

1 278) On or about August 27, 1997, Dewey Lee and Raymond
2 Oechsle attempted to murder Wayne Alton by stabbing him.

3 279) On or about August 28, 1997, defendant WAYNE
4 BRIDGEWATER and Allen Benton heated the letter that had been sent
5 by defendant RONALD BOYD SLOCUM on approximately August 25, 1997,
6 in order to reveal the message written in "invisible ink."

7 280) On or about August 28, 1997, in the Central
8 District of California and elsewhere, defendant RONALD BOYD
9 SLOCUM told Allen Benton during a telephone call that the message
10 about the war with the DC Blacks was the only hidden message in
11 the letter defendant RONALD BOYD SLOCUM had sent to Benton on
12 approximately August 25, 1997.

13 281) On or about August 28, 1997, defendant WAYNE
14 BRIDGEWATER told defendants JOHN STANLEY CAMPBELL, JR., JASON LEE
15 SCHWYHART, and HENRY MICHAEL HOUSTON about the war with the DC
16 Blacks.

17 282) On or about August 28, 1997, defendants WAYNE
18 BRIDGEWATER, JOHN STANLEY CAMPBELL, JR., JASON LEE SCHWYHART, and
19 HENRY MICHAEL HOUSTON made plans to murder black inmates in
20 Cellblock A at the United States Penitentiary at Lewisburg,
21 Pennsylvania.

22 283) On or about August 28, 1997, defendant HENRY
23 MICHAEL HOUSTON sneaked into Cellblock A at the United States
24 Penitentiary at Lewisburg, Pennsylvania, in order to participate
25 in the murder of black inmates in Cellblock A.

26 284) On or about August 28, 1997, defendants WAYNE
27 BRIDGEWATER, JOHN STANLEY CAMPBELL, JR., JASON LEE SCHWYHART, and
28 HENRY MICHAEL HOUSTON armed themselves with prison-made knives.

1 285) On or about August 28, 1997, defendant WAYNE
2 BRIDGEWATER murdered Frank Joyner by stabbing him to death.

3 286) On or about August 28, 1997, defendant HENRY
4 MICHAEL HOUSTON and Allen Benton murdered Abdul Salaam by
5 stabbing him to death.

6 287) On or about August 28, 1997, defendant WAYNE
7 BRIDGEWATER attempted to murder Byron Ball by stabbing him.

8 288) On or about August 28, 1997, defendant WAYNE
9 BRIDGEWATER attempted to murder Larry Fortune by stabbing him.

10 289) On or about August 28, 1997, defendants JOHN
11 STANLEY CAMPBELL, JR., and JASON LEE SCHWYHART attempted to
12 murder Titus Webster by stabbing him.

13 290) On or about August 28, 1997, defendants JOHN
14 STANLEY CAMPBELL, JR., and JASON LEE SCHWYHART attempted to
15 murder Harold Roberts by stabbing him.

16 291) In or about September 1997, defendant JOSEPH
17 PRINCIPE arranged to have defendant BARRY BYRON MILLS and Kevin
18 Roach placed on recreation in the same area so that defendant
19 BARRY BYRON MILLS and Roach could communicate about Aryan
20 Brotherhood affairs.

21 292) In or about September 1997, defendant BARRY BYRON
22 MILLS told Kevin Roach that the Aryan Brotherhood was at war with
23 the DC Blacks.

24 293) On or about September 1, 1997, in the Central
25 District of California and elsewhere, defendant RONALD BOYD
26 SLOCUM mailed a letter to defendant TYLER DAVIS BINGHAM saying
27 that he had passed along the message from defendant TYLER DAVIS
28 BINGHAM to Allen Benton about the need to murder black inmates at

1 the United States Penitentiary at Lewisburg, Pennsylvania.

2 294) On or about September 3, 1997, in the Central
3 District of California and elsewhere, defendant RONALD BOYD
4 SLOCUM discussed the order to murder black inmates at the United
5 States Penitentiary at Lewisburg, Pennsylvania, during a
6 telephone call with Allen Benton.

7 295) In or about October 1997, defendant BARRY BYRON
8 MILLS ordered defendant JESSE ANTONIO VAN METER to murder a
9 member of the DC Blacks as soon as given the opportunity.

10 296) On or about November 12, 1997, defendant JESSE
11 ANTONIO VAN METER attempted to murder Wardell Hillard by stabbing
12 him.

13 297) On or about December 25, 1997, defendant STEVE
14 LOREN SCOTT sent a message to Aryan Brotherhood member Lawrence
15 Klaker informing Klaker that the Aryan Brotherhood was "at on
16 sight war" with the DC Blacks.

17 298) On or about December 29, 1997, defendant STEVE
18 LOREN SCOTT sent a message to Lawrence Klaker informing Klaker of
19 efforts to manufacture weapons to arm all members of the Aryan
20 Brotherhood for the war against the DC Blacks.

21 299) On or about January 30, 1998, defendant STEVE
22 LOREN SCOTT had secreted within his body a prison-made knife to
23 be used in the war against the DC Blacks.

24 300) On or about January 30, 1998, Ronald Yandell
25 possessed a prison-made knife to be used in the war against the
26 DC Blacks.

27 301) On or about February 2, 1998, defendant STEVEN
28 WILLIAM HICKLIN possessed a prison-made knife to be used in the

1 war against the DC Blacks.

2 302) On or about June 9, 1998, defendant STEVE LOREN
3 SCOTT possessed a "hit list" of black inmates who were to be
4 murdered.

5 303) On or about November 16, 1998, defendant TYLER
6 DAVIS BINGHAM assaulted Leroy Elmore.

7 304) On or about November 16, 1998, defendant JOSEPH
8 PRINCIPE filed a false Bureau of Prisons report stating that
9 Leroy Elmore assaulted defendant TYLER DAVIS BINGHAM and that
10 Leroy Elmore appeared to have a weapon during the altercation
11 with defendant TYLER DAVIS BINGHAM.

12 305) In or about May 1999, Aryan Brotherhood associate
13 Terry Wright supplied a knife to defendant RICHARD SCOTT McINTOSH
14 to be used to murder Terry Walker.

15 306) On or about May 18, 1999, defendants RICHARD SCOTT
16 McINTOSH and CARL EDGAR KNORR, JR., murdered Terry Walker by
17 stabbing him to death.

18 307) On or about May 19, 1999, defendant DAVID MICHAEL
19 SAHAKIAN had secreted within his body a prison-made knife to be
20 used in the war against the DC Blacks.

21 308) On or about November 24, 2000, defendant STEVE
22 LOREN SCOTT attempted to murder Erving Bond by stabbing him.

23 Murder of Aaron Marsh

24 309) In or before March 1997, the members of the
25 California Commission, including defendants JOHN WILLIAM STINSON,
26 RICHARD LLOYD TERFLINGER, ROBERT LEE GRIFFIN, and DAVID ALLEN
27 CHANCE, decided to order that Aryan Brotherhood member Aaron
28 Marsh be murdered for failure to carry out an order to murder

1 another inmate.

2 310) In or before March 1997, defendant RICHARD LLOYD
3 TERFLINGER sent a message to Aryan Brotherhood member Brian Healy
4 saying that Aaron Marsh was to be murdered.

5 311) On or about March 13, 1997, Brian Healy told
6 defendant ELLIOTT SCOTT GRIZZLE that Aaron Marsh was to be
7 murdered.

8 312) In or before July 1997, defendant ELLIOTT SCOTT
9 GRIZZLE told defendant GARY JOE LITTRELL that Aaron Marsh was to
10 be murdered.

11 313) On or about July 25, 1997, defendant GARY JOE
12 LITTRELL murdered Aaron Marsh by strangling him to death.

13 Attempted Murder of Michael Nevergall

14 314) In or before April 1997, defendant BARRY BYRON
15 MILLS ordered defendant CHRISTOPHER OVERTON GIBSON to murder
16 Michael Nevergall for having made negative comments about the
17 Aryan Brotherhood.

18 315) On or about April 8, 1997, defendants CHRISTOPHER
19 OVERTON GIBSON, MANUEL LARRY JACKSON, and RAFAEL GONZALEZ-MUNOZ,
20 JR., attempted to murder Michael Nevergall by stabbing him.

21 316) On or about September 1997, defendant CHRISTOPHER
22 OVERTON GIBSON told Aryan Brotherhood member Kevin Roach that he
23 had participated in the attempted murder of Michael Nevergall on
24 behalf of the Aryan Brotherhood.

25 317) On or about November 1998, defendant MANUEL LARRY
26 JACKSON told Aryan Brotherhood member Eugene Bentley that he had
27 participated in the attempted murder of Michael Nevergall on
28 behalf of the Aryan Brotherhood.

1 318) On or about November 1998, defendant RAFAEL
2 GONZALEZ-MUNOZ told Aryan Brotherhood member Eugene Bentley that
3 he had participated in the attempted murder of Michael Nevergall
4 on behalf of the Aryan Brotherhood.

5 Murder of Mark Kulikov

6 319) On or about November 8, 1999, Aryan Brotherhood
7 member Christopher Poore murdered Mark Kulikov by shooting him.

8 320) On or about November 8, 1999, following the murder
9 of Mark Kulikov, Christopher Poore told onlookers that he
10 committed the murder for the Aryan Brotherhood because Kulikov
11 was not giving the Aryan Brotherhood its share of drug
12 trafficking proceeds.

13 Solicitation to Murder Jason Butler

14 321) On or about October 7, 2000, in the Central
15 District of California and elsewhere, defendant ELLIOTT SCOTT
16 GRIZZLE sent a letter to Jonathan Schauerman asking him to murder
17 Jason Butler because Butler had physically abused defendant
18 BRENDA JO RILEY.

19 322) On or about October 31, 2000, in the Central
20 District of California and elsewhere, defendant ELLIOTT SCOTT
21 GRIZZLE sent a second letter to Jonathan Schauerman asking him to
22 murder Jason Butler.

23 Use of the Mail

24 323) On or about March 24, 1995, defendant BARRY BYRON
25 MILLS mailed a letter to Shirley Crowder in which, among other
26 things, defendant BARRY BYRON MILLS asked Crowder to give the
27 telephone number of defendant MARTY LAINE FOAKES to Jeff Fort,
28 leader of the El Rukns criminal organization.

1 324) On or about April 11, 1995, defendant BARRY BYRON
2 MILLS mailed a letter to Shirley Crowder in which, among other
3 things, defendant BARRY BYRON MILLS thanked Crowder for
4 forwarding a message to Jeff Fort.

5 325) On or about March 11, 1996, in the Central
6 District of California and elsewhere, defendant RONALD BOYD
7 SLOCUM mailed a letter to defendant BARRY BYRON MILLS in which,
8 among other things, defendant RONALD BOYD SLOCUM said that he had
9 recently met with defendant ROBERT LEE GRIFFIN.

10 326) On or about April 11, 1996, in the Central
11 District of California and elsewhere, defendant MICHAEL BRUCE
12 SHEPHERD mailed a letter to Charles Roe in which, among other
13 things, defendant MICHAEL BRUCE SHEPHERD told Roe to contact
14 defendant DEBRA LEE STINSON to tell her about a rumor that
15 Mexican Mafia members had assaulted defendant ROBERT LEE GRIFFIN.

16 327) On or about July 5, 1996, in the Central District
17 of California and elsewhere, defendant BARRY BYRON MILLS mailed a
18 letter to Charles Roe in which, among other things, defendant
19 BARRY BYRON MILLS told Roe to speak to defendant RONALD BOYD
20 SLOCUM about a rumor that Mexican Mafia members had assaulted
21 defendant ROBERT LEE GRIFFIN.

22 328) On or about August 10, 1996, in the Central
23 District of California and elsewhere, defendant RONALD BOYD
24 SLOCUM mailed a letter to defendant BARRY BYRON MILLS in which,
25 among other things, defendant RONALD BOYD SLOCUM said that
26 Charles Roe should not be trusted.

27 329) On or about August 23, 1996, in the Central
28 District of California and elsewhere, defendant RICHARD LLOYD

1 TERFLINGER mailed a letter to Charles Roe in which, among other
2 things, defendant RICHARD LLOYD TERFLINGER asked Roe to have him
3 and defendant MICHAEL BRUCE SHEPHERD brought to Orange County
4 Jail as witnesses in a criminal case.

5 330) On or about December 30, 1996, in the Central
6 District of California and elsewhere, defendant RONALD BOYD
7 SLOCUM mailed to defendant BARRY BYRON MILLS a money order and a
8 letter in which, among other things, defendant RONALD BOYD SLOCUM
9 said that the money had come from Oreste Abbamonte and that
10 defendant EDGAR WESLEY HEVLE had been disciplined by the Federal
11 Bureau of Prisons for involvement in a murder.

12 331) On or about December 30, 1996, in the Central
13 District of California and elsewhere, defendant RONALD BOYD
14 SLOCUM mailed to defendant TYLER DAVIS BINGHAM a money order and
15 a letter in which, among other things, defendant RONALD BOYD
16 SLOCUM said that the money had come from Oreste Abbamonte.

17 332) On or about January 7, 1997, in the Central
18 District of California and elsewhere, defendant BARRY BYRON MILLS
19 mailed a letter to defendant RONALD BOYD SLOCUM in which, among
20 other things, defendant BARRY BYRON MILLS said that he had
21 received a money order from defendant RONALD BOYD SLOCUM and
22 asked defendant RONALD BOYD SLOCUM to thank Oreste Abbamonte for
23 the money.

24 333) On or about April 2, 1997, in the Central District
25 of California and elsewhere, defendant RONALD BOYD SLOCUM mailed
26 a letter to defendant BARRY BYRON MILLS in which, among other
27 things, defendant RONALD BOYD SLOCUM warned that defendant ROBERT
28 LEE GRIFFIN and others might be facing a racketeering indictment.

1 334) On or about October 6, 1997, defendant JOANNE
2 LOUISE GUTHRIE mailed a letter to defendant BARRY BYRON MILLS in
3 which defendant JOANNE LOUISE GUTHRIE passed along information
4 about Aryan Brotherhood affairs learned from a number of Aryan
5 Brotherhood members and associates.

6 335) On or about October 14, 1997, defendant BARRY
7 BYRON MILLS mailed a letter to defendant JOANNE LOUISE GUTHRIE in
8 which, among other things, defendant BARRY BYRON MILLS asked
9 defendant JOANNE LOUISE GUTHRIE to have one of her friends pass
10 information to and from incarcerated Aryan Brotherhood member
11 Norman Matthews.

12 336) On or about November 20, 1997, defendant BARRY
13 BYRON MILLS mailed a letter to defendant JOANNE LOUISE GUTHRIE in
14 which, among other things, defendant BARRY BYRON MILLS asked
15 defendant JOANNE LOUISE GUTHRIE to contact defendant RONALD BOYD
16 SLOCUM to find out whether there had been racial violence at the
17 United States Penitentiary at Lompoc, California, as part of the
18 Aryan Brotherhood's war with the DC Blacks prison gang.

19 337) On or about December 2, 1997, defendant JOANNE
20 LOUISE GUTHRIE mailed a letter to defendant BARRY BYRON MILLS in
21 which, among other things, defendant JOANNE LOUISE GUTHRIE said
22 that Aryan Brotherhood member Terry Marsh had not been in contact
23 with the Aryan Brotherhood in 18 months.

24 338) In or about 1998, defendant CLEO ROY mailed a
25 letter to Aryan Brotherhood member Phillip Myers in which, among
26 other things, defendant CLEO ROY asked that Myers send money to
27 defendant CLEO ROY in fulfillment of Myers' obligations as an
28 Aryan Brotherhood member who had been released from prison.

1 339) On or about January 6, 1998, defendant BARRY BYRON
2 MILLS mailed a letter to defendant MARK ALAN NYQUIST in which,
3 among other things, defendant BARRY BYRON MILLS ordered defendant
4 MARK ALAN NYQUIST to commit criminal acts on behalf of the Aryan
5 Brotherhood while out of custody.

6 340) On or about January 7, 1998, defendant BARRY BYRON
7 MILLS ordered Aryan Brotherhood member Kevin Roach to mail a
8 letter to defendant MARK ALAN NYQUIST saying, among other things,
9 that defendant MARK ALAN NYQUIST was to begin manufacturing
10 methamphetamine in order to make money for the Aryan Brotherhood.

11 341) On or about January 15, 1998, defendant JOANNE
12 LOUISE GUTHRIE mailed a letter to defendant BARRY BYRON MILLS in
13 which, among other things, defendant JOANNE LOUISE GUTHRIE said
14 that she had made contact with Phillip Myers.

15 342) On or about January 27, 1998, defendant BARRY
16 BYRON MILLS mailed a letter to defendant JOANNE LOUISE GUTHRIE in
17 which, among other things, defendant BARRY BYRON MILLS told
18 defendant JOANNE LOUISE GUTHRIE to stay in contact with Phillip
19 Myers and to assist Myers in committing acts on behalf of the
20 Aryan Brotherhood.

21 343) On or about September 2, 1998, in the Central
22 District of California and elsewhere, defendant BARRY BYRON MILLS
23 mailed a letter to defendant RONALD BOYD SLOCUM in which, among
24 other things, defendant BARRY BYRON MILLS told defendant RONALD
25 BOYD SLOCUM that defendant JOANNE LOUISE GUTHRIE is completely
26 loyal to the Aryan Brotherhood.

27 344) On or about September 19, 1998, defendant EDGAR
28 WESLEY HEVLE mailed a letter to Phillip Myers in which, among

1 other things, defendant EDGAR WESLEY HEVLE asked Myers to say
2 whether Myers would fulfill his obligations to the Aryan
3 Brotherhood.

4 345) On or about September 24, 1998, defendant SEAN
5 MATTHEW DARCY mailed a letter to defendant TYLER DAVIS BINGHAM in
6 which, among other things, defendant SEAN MATTHEW DARCY informed
7 defendant TYLER DAVIS BINGHAM who defendants MICHAEL PATRICK
8 McELHINEY and DAVID MICHAEL SAHAKIAN were incarcerated with and
9 that defendants MICHAEL PATRICK McELHINEY and DAVID MICHAEL
10 SAHAKIAN anticipated being indicted on very serious charges.

11 346) On or about December 10, 1998, in the Central
12 District of California and elsewhere, defendant BARRY BYRON MILLS
13 mailed a letter to defendant RONALD BOYD SLOCUM in which, among
14 other things, defendant BARRY BYRON MILLS said that he and
15 defendant TYLER DAVIS BINGHAM had recently gotten into fights
16 with black inmates as part of the Aryan Brotherhood's war with
17 the DC Blacks.

18 347) On or about January 21, 1999, defendant JOANNE
19 LOUISE GUTHRIE mailed to defendant BARRY BYRON MILLS a money
20 order and a letter inquiring, among other things, about whether
21 defendant TYLER DAVIS BINGHAM and Aryan Brotherhood member Ronald
22 Yandell were being held in segregation.

23 348) On or about February 9, 1999, in the Central
24 District of California and elsewhere, defendant JOHN WILLIAM
25 STINSON mailed a letter to Aryan Brotherhood member Kenneth
26 Landers in which, among other things, defendant JOHN WILLIAM
27 STINSON ordered Landers to contact defendant RONALD BOYD SLOCUM
28 and to take orders from defendant RONALD BOYD SLOCUM while out of

1 custody.

2 349) On or about March 4, 1999, in the Central District
3 of California and elsewhere, defendant THOMAS LEROY HAMPTON
4 mailed a letter to defendant JOHN WILLIAM STINSON in which, among
5 other things, defendant THOMAS LEROY HAMPTON said that he had
6 committed crimes on behalf of the Aryan Brotherhood while out of
7 custody and would share the proceeds of his crimes with other
8 Aryan Brotherhood members.

9 350) On or about March 10, 1999, in the Central
10 District of California and elsewhere, defendant JOHN WILLIAM
11 STINSON mailed a letter to Kenneth Landers in which, among other
12 things, defendant JOHN WILLIAM STINSON gave Landers permission to
13 extort money from white drug traffickers and other white
14 criminals on behalf of the Aryan Brotherhood.

15 351) On or about April 5, 1999, in the Central District
16 of California and elsewhere, defendant RONALD BOYD SLOCUM mailed
17 a letter to Paul Kelly, to be given to Phillip Myers, telling
18 Myers to get in contact with the Aryan Brotherhood.

19 352) On or about April 15, 1999, defendant BARRY BYRON
20 MILLS mailed a letter to defendant MARK ALAN NYQUIST in which,
21 among other things, defendant BARRY BYRON MILLS asked defendant
22 MARK ALAN NYQUIST to say whether he remained loyal to the Aryan
23 Brotherhood.

24 353) On or about April 28, 1999, defendant MARK ALAN
25 NYQUIST mailed a letter to defendant BARRY BYRON MILLS in which,
26 among other things, defendant MARK ALAN NYQUIST pledged his
27 loyalty to the Aryan Brotherhood.

28 354) On or about June 23, 1999, defendant MARTY LAINE

1 FOAKES mailed a letter to defendant BARRY BYRON MILLS in which,
2 among other things, defendant MARTY LAINE FOAKES said that she
3 had sent a message to organized crime leader Nicodemo Scarfo but
4 had not received a response.

5 355) On or about August 10, 1999, defendant MICHAEL
6 BRUCE SHEPHERD caused a letter to be mailed to Aryan Brotherhood
7 member Robert Crane in which, among other things, defendant
8 MICHAEL BRUCE SHEPHERD set forth a proposal to organize Aryan
9 Brotherhood members who are out of custody.

10 356) On or about August 21, 1999, defendant MICHAEL
11 BRUCE SHEPHERD caused a letter to be mailed to Robert Crane
12 containing, among other things, responses from Aryan Brotherhood
13 leaders to the proposal of defendant MICHAEL BRUCE SHEPHERD to
14 organize Aryan Brotherhood members who are out of custody.

15 357) On or about September 2, 1999, defendant MICHAEL
16 BRUCE SHEPHERD caused a letter to be mailed to Robert Crane in
17 which, among other things, defendant MICHAEL BRUCE SHEPHERD said
18 that he was going forward with plans to organize Aryan
19 Brotherhood members who are out of custody.

20 358) On or about September 24, 1999, defendant MICHAEL
21 BRUCE SHEPHERD caused a letter to be mailed to Robert Crane
22 containing, among other things, a message from defendant JOHN
23 WILLIAM STINSON approving James Magee for membership in the Aryan
24 Brotherhood.

25 359) On or about December 11, 1999, in the Central
26 District of California and elsewhere, defendant RONALD BOYD
27 SLOCUM mailed a letter to defendant STEVE LOREN SCOTT in which,
28 among other things, defendant RONALD BOYD SLOCUM said that he had

1 agreed to commit crimes with an Aryan Brotherhood member who was
2 later discovered to be cooperating with law enforcement
3 authorities.

4 360) On or about January 28, 2000, in the Central
5 District of California and elsewhere, defendant JOHN WILLIAM
6 STINSON mailed a letter to defendant JOHN HENRY HARPER in which,
7 among other things, defendant JOHN WILLIAM STINSON ordered
8 defendant JOHN HENRY HARPER to commit crimes on behalf of the
9 Aryan Brotherhood and to provide money to incarcerated Aryan
10 Brotherhood members.

11 361) On or about February 16, 2000, in the Central
12 District of California and elsewhere, defendant JOHN HENRY HARPER
13 mailed a letter to Aryan Brotherhood member Todd Ashker in which,
14 among other things, defendant JOHN HENRY HARPER said that he had
15 contacted defendant RONALD BOYD SLOCUM in order to begin
16 committing criminal acts on behalf of the Aryan Brotherhood.

17 362) On or about February 21, 2000, in the Central
18 District of California and elsewhere, defendant JOHN HENRY HARPER
19 mailed a letter to Todd Ashker in which, among other things,
20 defendant JOHN HENRY HARPER said that he had contacted an
21 attorney in an attempt to intimidate the attorney into doing the
22 Aryan Brotherhood's bidding.

23 363) On or about April 3, 2000, in the Central District
24 of California and elsewhere, defendant RICHARD LLOYD TERFLINGER
25 mailed a letter to Deborah Mickey, to be forwarded to Aryan
26 Brotherhood member James Mickey, in which, among other things,
27 defendant RICHARD LLOYD TERFLINGER told Mickey to have white
28 inmates refrain from committing acts of racial violence so that

1 Aryan Brotherhood members at Pelican Bay State Prison in Crescent
2 City, California, would be released from segregation.

3 364) On or about June 1, 2000, in the Central District
4 of California and elsewhere, defendant EDWARD TYLER BURNETT
5 mailed a letter to defendant RONALD BOYD SLOCUM in which, among
6 other things, defendant EDWARD TYLER BURNETT asked defendant
7 RONALD BOYD SLOCUM to look into the background of a correctional
8 officer at Pelican Bay State Prison in Crescent City, California,
9 to see whether the correctional officer should be murdered.

10 365) On or about November 16, 2000, defendant LEE ANN
11 MARTIN mailed a letter to defendant RICHARD LLOYD TERFLINGER in
12 which, among other things, defendant LEE ANN MARTIN said that she
13 would be sending defendant RICHARD LLOYD TERFLINGER money she had
14 received from an Aryan Brotherhood member or associate.

15 366) On or about November 26, 2000, in the Central
16 District of California and elsewhere, defendant EDWARD TYLER
17 BURNETT mailed a letter to defendant RONALD BOYD SLOCUM in which,
18 among other things, defendant EDWARD TYLER BURNETT asked whether
19 defendant RONALD BOYD SLOCUM had looked into the background of a
20 correctional officer at Pelican Bay State Prison in Crescent
21 City, California.

22 367) On or about December 3, 2000, defendant RICHARD
23 LLOYD TERFLINGER mailed a letter to defendant LEE ANN MARTIN in
24 which, among other things, defendant RICHARD LLOYD TERFLINGER
25 chastised defendant LEE ANN MARTIN for failing to perform her
26 duties to the Aryan Brotherhood in an efficient manner.

27 368) On or about March 27, 2001, in the Central
28 District of California and elsewhere, defendant GARY JOE LITTRELL

1 mailed a letter to Cleta Baker in which, among other things,
2 defendant GARY JOE LITRELL told Baker that she was to follow
3 only his orders in matters relating to the Aryan Brotherhood.

4 369) On or about July 24, 2001, defendant BRENDA JO
5 RILEY mailed a letter to defendant ELLIOTT SCOTT GRIZZLE
6 containing information about a government witness in a case
7 involving the Aryan Brotherhood.

8 370) On or about August 9, 2001, defendant BRENDA JO
9 RILEY mailed a letter to defendant JOHN WILLIAM STINSON in which,
10 among other things, defendant BRENDA JO RILEY described the
11 health problems of a member of the Mexican Mafia.

12 371) On or about September 27, 2001, defendant ELLIOTT
13 SCOTT GRIZZLE mailed a letter to defendant BRENDA JO RILEY in
14 which, among other things, defendant ELLIOTT SCOTT GRIZZLE told
15 defendant BRENDA JO RILEY to obtain information about court cases
16 involving the Aryan Brotherhood.

17 372) On or about December 9, 2001, in the Central
18 District of California and elsewhere, defendant RICHARD LLOYD
19 TERFLINGER mailed a letter to Aryan Brotherhood associate Simone
20 Lawrence in which, among other things, defendant RICHARD LLOYD
21 TERFLINGER told Lawrence to obtain information about the status
22 of a criminal case charging Aryan Brotherhood member Christopher
23 Poore with having murdered Mark Kulikov.

24 373) On or about February 21, 2002, in the Central
25 District of California and elsewhere, defendant RONALD BOYD
26 SLOCUM mailed a letter to defendant ROBERT LEE GRIFFIN in which,
27 among other things, defendant RONALD BOYD SLOCUM told defendant
28 ROBERT LEE GRIFFIN that defendant EDWARD TYLER BURNETT had not

1 dropped out of the Aryan Brotherhood.

2 Use of the Telephone

3 374) On or about July 7, 1996, in the Central District
4 of California and elsewhere, defendants BARRY BYRON MILLS and
5 RONALD BOYD SLOCUM spoke on the telephone and, among other
6 things, defendant BARRY BYRON MILLS told defendant RONALD BOYD
7 SLOCUM to contact Charles Roe.

8 375) On or about August 2, 1996, in the Central
9 District of California and elsewhere, defendant BARRY BYRON MILLS
10 spoke on the telephone with Charles Roe and, among other things,
11 expressed a desire to communicate regularly with the leaders of
12 the California faction of the Aryan Brotherhood.

13 376) On or about September 10, 1996, in the Central
14 District of California and elsewhere, defendant RONALD BOYD
15 SLOCUM spoke on the telephone with Mary Bentley in order to
16 arrange a narcotics transaction in which the narcotics would
17 eventually be smuggled into a federal penitentiary.

18 377) On or about September 23, 1996, in the Central
19 District of California and elsewhere, defendants TYLER DAVIS
20 BINGHAM and RONALD BOYD SLOCUM spoke on the telephone and, among
21 other things, defendant RONALD BOYD SLOCUM provided defendant
22 TYLER DAVIS BINGHAM with information about the whereabouts and
23 well-being of various Aryan Brotherhood members and associates.

24 378) On or about September 29, 1996, in the Central
25 District of California and elsewhere, defendants BARRY BYRON
26 MILLS and RONALD BOYD SLOCUM spoke on the telephone and, among
27 other things, defendant BARRY BYRON MILLS said that he was
28 sending capable Aryan Brotherhood members and associates to

1 commit criminal acts for the Aryan Brotherhood at the direction
2 of defendant RONALD BOYD SLOCUM.

3 379) On or about December 27, 1996, in the Central
4 District of California and elsewhere, defendant RONALD BOYD
5 SLOCUM spoke on the telephone with Oreste Abbamonte and, among
6 other things, agreed to send money received from Abbamonte to
7 defendants BARRY BYRON MILLS and TYLER DAVIS BINGHAM.

8 380) On or about April 2, 1997, defendants BARRY BYRON
9 MILLS and JOANNE LOUISE GUTHRIE spoke on the telephone and, among
10 other things, defendant BARRY BYRON MILLS said that he had
11 sponsored Ronald Yandell for membership in the Aryan Brotherhood.

12 381) On or about June 12, 1997, defendants BARRY BYRON
13 MILLS and JOANNE LOUISE GUTHRIE spoke on the telephone and, among
14 other things, defendant BARRY BYRON MILLS told defendant JOANNE
15 LOUISE GUTHRIE of plans to have Ronald Yandell commit illegal
16 acts on behalf of the Aryan Brotherhood once released from
17 prison.

18 382) On or about July 6, 1997, defendants TYLER DAVIS
19 BINGHAM and SEAN MATTHEW DARCY spoke on the telephone and, among
20 other things, defendant SEAN MATTHEW DARCY told defendant TYLER
21 DAVIS BINGHAM where organized crime leader Nicodemo Scarfo was
22 being housed.

23 383) On or about December 23, 1997, defendant JOANNE
24 LOUISE GUTHRIE, acting on behalf of defendant BARRY BYRON MILLS,
25 left a telephone message for Aryan Brotherhood member Phillip
26 Myers asking Myers to get in contact with her.

27 384) On or about December 24, 1997, defendant JOANNE
28 LOUISE GUTHRIE, acting on behalf of defendant BARRY BYRON MILLS,

1 left a telephone message for Phillip Myers asking Myers to get in
2 contact with her.

3 385) On or about January 14, 1998, defendant JOANNE
4 LOUISE GUTHRIE, acting on behalf of defendant BARRY BYRON MILLS,
5 left a telephone message for Phillip Myers asking Myers to get in
6 contact with her.

7 386) On or about January 27, 1998, defendant JOANNE
8 LOUISE GUTHRIE, acting on behalf of defendant BARRY BYRON MILLS,
9 left a telephone message for Phillip Myers asking Myers to get in
10 contact with her.

11 387) On or about October 1, 1998, in the Central
12 District of California, defendant DEBRA LEE STINSON spoke on the
13 telephone with Michael Davis and, among other things, told Davis
14 to contact defendant JOHN WILLIAM STINSON to get permission to
15 talk with her about Aryan Brotherhood activities.

16 388) On or about April 3, 1999, in the Central District
17 of California and elsewhere, defendant RONALD BOYD SLOCUM spoke
18 on the telephone with Oreste Abbamonte and, among other things,
19 told Abbamonte when racial troubles started between the Aryan
20 Brotherhood and the DC Blacks prison gang.

21 389) On or about April 14, 1999, in the Central
22 District of California and elsewhere, defendants BARRY BYRON
23 MILLS and RONALD BOYD SLOCUM spoke on the telephone and, among
24 other things, defendant BARRY BYRON MILLS said that Aryan
25 Brotherhood members who are out of custody need to be made to
26 share the proceeds of their criminal activities.

27 390) On or about October 15, 1999, in the Central
28 District of California and elsewhere, defendant RONALD BOYD

1 SLOCUM spoke on the telephone with Aryan Brotherhood member
2 Eugene Bentley and, among other things, agreed to provide Bentley
3 with narcotics to be smuggled into the United States Penitentiary
4 at Leavenworth, Kansas.

5 391) On or about August 6, 2000, defendants MICHAEL
6 PATRICK McELHINEY and SEAN MATTHEW DARCY spoke on the telephone
7 and, among other things, defendant MICHAEL PATRICK McELHINEY said
8 that he and defendant DAVID MICHAEL SAHAKIAN were in control of
9 the activities of white inmates at the United States Penitentiary
10 at Marion, Illinois.

11 392) On or about August 29, 2000, defendants TYLER
12 DAVIS BINGHAM and SEAN MATTHEW DARCY spoke on the telephone and,
13 among other things, defendant SEAN MATTHEW DARCY told defendant
14 TYLER DAVIS BINGHAM that defendants MICHAEL PATRICK McELHINEY and
15 DAVID MICHAEL SAHAKIAN were in control of the activities of white
16 inmates at the United States Penitentiary at Marion, Illinois.

17 All in violation of Title 18, United States Code, Section
18 1962(d).

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1 COUNTS THREE THROUGH EIGHT

2 [18 U.S.C. § 1959(a) (1)]

3 68. At all times relevant to this Indictment, the Aryan
4 Brotherhood, as described more particularly in paragraphs One
5 through Fifteen of the Introductory Allegations of this
6 Indictment, which paragraphs are incorporated and realleged
7 herein as if set forth in full, has constituted an enterprise as
8 that term is defined in Title 18, United States Code, Section
9 1959(b) (2), that is, a group of individuals associated in fact,
10 which was engaged in, and the activities of which affected,
11 interstate and foreign commerce.

12 69. At all times relevant to this Indictment, the Aryan
13 Brotherhood, through its members and associates, has been engaged
14 in racketeering activity, as defined in Title 18, United States
15 Code, Sections 1959(b) (1) and 1961(1), that is, acts involving
16 murder, extortion, and robbery, in violation of the laws of
17 Georgia, Illinois, California, Kansas, Colorado, Pennsylvania,
18 and Missouri, and narcotics trafficking, in violation of Title
19 21, United States Code, Sections 841 and 846.

20 70. On or about the dates specified below, the defendants
21 specified below committed the offenses specified below, and each
22 such offense was committed for the purpose of gaining entrance to
23 or maintaining and increasing the position of the specified
24 defendants in the Aryan Brotherhood, an enterprise engaged in
25 racketeering activity, in violation of Title 18, United States
26 Code, Section 1959(a) (1).

27 COUNT THREE

28 71. Paragraphs Sixty-Eight through Seventy are hereby

1 incorporated and realleged herein as if set forth in full.

2 72. On or about August 25, 1995, within the Central
3 District of California and elsewhere, defendants MICHAEL PATRICK
4 McELHINEY, aka "Big Mac," and DAVID MICHAEL SAHAKIAN unlawfully,
5 willfully, deliberately, maliciously, and with premeditation and
6 malice aforethought did aid, abet, advise, encourage, and
7 otherwise participate in the murder of Charles Leger, in
8 violation of Title 18, United States Code, Sections 2(a) and
9 1111.

10 COUNT FOUR

11 73. Paragraphs Sixty-Eight through Seventy are hereby
12 incorporated and realleged herein as if set forth in full.

13 74. On or about February 7, 1996, within the Central
14 District of California and elsewhere, defendants JOHN WILLIAM
15 STINSON, aka "Youngster," aka "The Youngest," RICHARD LLOYD
16 TERFLINGER, aka "Bart Simpson," ROBERT LEE GRIFFIN, aka "Blinky,"
17 aka "McGrif," DAVID ALLEN CHANCE, and EDWARD TYLER BURNETT
18 unlawfully, willfully, deliberately, maliciously, and with
19 premeditation and malice aforethought did aid, abet, advise,
20 encourage, and otherwise participate in the murder of Arthur
21 Ruffo, in violation of California Penal Code Sections 31 and 187.

22 COUNT FIVE

23 75. Paragraphs Sixty-Eight through Seventy are hereby
24 incorporated and realleged herein as if set forth in full.

25 76. On or about July 25, 1997, within the Central District
26 of California and elsewhere, defendants JOHN WILLIAM STINSON, aka
27 "Youngster," aka "The Youngest," RICHARD LLOYD TERFLINGER, aka
28 "Bart Simpson," ROBERT LEE GRIFFIN, aka "Blinky," aka "McGrif,"

1 DAVID ALLEN CHANCE, GARY JOE LITRELL, and ELLIOTT SCOTT GRIZZLE,
2 aka "Scott," unlawfully, willfully, deliberately, maliciously,
3 and with premeditation and malice aforethought did aid, abet,
4 advise, encourage, and otherwise participate in the murder of
5 Aaron Marsh, in violation of California Penal Code Sections 31
6 and 187.

7 COUNT SIX

8 77. Paragraphs Sixty-Eight through Seventy are hereby
9 incorporated and realleged herein as if set forth in full.

10 78. On or about August 28, 1997, within the Central
11 District of California and elsewhere, defendants BARRY BYRON
12 MILLS, aka "McB," TYLER DAVIS BINGHAM, aka "T.D.," aka "The
13 Hulk," aka "T," aka "Bull," RONALD BOYD SLOCUM, aka "Slo," aka
14 "McKool," MICHAEL PATRICK McELHINEY, aka "Big Mac," DAVID MICHAEL
15 SAHAKIAN, WAYNE BRIDGEWATER, CHRISTOPHER OVERTON GIBSON, EDGAR
16 WESLEY HEVLE, aka "Snail," JOHN STANLEY CAMPBELL, JR., JESSE
17 ANTONIO VAN METER, JASON LEE SCHWYHART, and HENRY MICHAEL
18 HOUSTON, aka "Tweak," unlawfully, willfully, deliberately,
19 maliciously, and with premeditation and malice aforethought did
20 aid, abet, advise, encourage, and otherwise participate in the
21 murder of Frank Joyner, in violation of Title 18, United States
22 Code, Sections 2(a) and 1111.

23 COUNT SEVEN

24 79. Paragraphs Sixty-Eight through Seventy are hereby
25 incorporated and realleged herein as if set forth in full.

26 80. On or about August 28, 1997, within the Central
27 District of California and elsewhere, defendants BARRY BYRON
28 MILLS, aka "McB," TYLER DAVIS BINGHAM, aka "T.D.," aka "The

1 Hulk," aka "T," aka "Bull," RONALD BOYD SLOCUM, aka "Slo," aka
2 "McKool," MICHAEL PATRICK McELHINEY, aka "Big Mac," DAVID MICHAEL
3 SAHAKIAN, WAYNE BRIDGEWATER, CHRISTOPHER OVERTON GIBSON, EDGAR
4 WESLEY HEVLE, aka "Snail," JOHN STANLEY CAMPBELL, JR., JESSE
5 ANTONIO VAN METER, JASON LEE SCHWYHART, and HENRY MICHAEL
6 HOUSTON, aka "Tweak," unlawfully, willfully, deliberately,
7 maliciously, and with premeditation and malice aforethought did
8 aid, abet, advise, encourage, and otherwise participate in the
9 murder of Abdul Salaam, in violation of Title 18, United States
10 Code, Sections 2(a) and 1111.

11 COUNT EIGHT

12 81. Paragraphs Sixty-Eight through Seventy are hereby
13 incorporated and realleged herein as if set forth in full.

14 82. On or about May 18, 1999, within the Central District
15 of California and elsewhere, defendants BARRY BYRON MILLS, aka
16 "McB," TYLER DAVIS BINGHAM, aka "T.D.," aka "The Hulk," aka "T,"
17 aka "Bull," RONALD BOYD SLOCUM, aka "Slo," aka "McKool," MICHAEL
18 PATRICK McELHINEY, aka "Big Mac," DAVID MICHAEL SAHAKIAN, STEVE
19 LOREN SCOTT, aka "Scottie," WAYNE BRIDGEWATER, STEVEN WILLIAM
20 HICKLIN, CHRISTOPHER OVERTON GIBSON, EDGAR WESLEY HEVLE, aka
21 "Snail," JOHN STANLEY CAMPBELL, JR., JESSE ANTONIO VAN METER,
22 RICHARD SCOTT McINTOSH, CARL EDGAR KNORR, JR., JASON LEE
23 SCHWYHART, and HENRY MICHAEL HOUSTON, aka "Tweak," unlawfully,
24 willfully, deliberately, maliciously, and with premeditation and
25 malice aforethought did aid, abet, advise, encourage, and
26 otherwise participate in the murder of Terry Walker, in violation
27 of Title 18, United States Code, Sections 2(a) and 1111.

COUNT NINE

[18 U.S.C. § 1111]

83. On or about August 9, 1989, in Santa Barbara County, within the Central District of California, and within the territorial jurisdiction of the United States, that is, at the United States Penitentiary at Lompoc, California, defendants BARRY BYRON MILLS, TYLER DAVIS BINGHAM, aka "T.D.," aka "The Hulk," aka "T," aka "Bull," RONALD BOYD SLOCUM, aka "Slo," aka "McKool," EDGAR WESLEY HEVLE, aka "Snail," and GLEN ALAN WEST, aka "Speedy," willfully, deliberately, maliciously, and with premeditation and malice aforethought killed and aided and abetted the killing of Arva Lee Ray.

COUNT TEN

[18 U.S.C. § 1111]

84. On or about December 28, 1992, in Santa Barbara County, within the Central District of California, and within the territorial jurisdiction of the United States, that is, at the United States Penitentiary at Lompoc, California, defendants BARRY BYRON MILLS, TYLER DAVIS BINGHAM, aka "T.D.," aka "The Hulk," aka "T," aka "Bull," RONALD BOYD SLOCUM, aka "Slo," aka "McKool," and DONALD EDWARD KENNEDY willfully, deliberately, maliciously, and with premeditation and malice aforethought killed and aided and abetted the killing of William McKinney.

A TRUE BILL

Foreperson

DEBRA W. YANG
United States Attorney

JOHN S. GORDON
Assistant United States Attorney
Chief, Criminal Division