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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," )

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, )  
18 CARL EDGAR KNORR, JR., )  
19 JASON LEE SCHWYHART, )  
20 HENRY MICHAEL HOUSTON, )  
21 aka "Tweak," )  
22 MANUEL LARRY JACKSON, )  
23 aka "Cricket," )  
24 RAFAEL GONZALEZ-MUNOZ, JR., )  
25 aka "Cisco," )  
26 DEBRA LEE STINSON, )  
27 aka "The Girl Down The )  
28 Street," )  
29 JOANNE LOUISE GUTHRIE, )  
30 aka "Shorty," )  
31 SEAN MATTHEW DARCY, )  
32 MARTY LAINE FOAKES, )  
33 aka "Marty Donahue," )  
34 LEE ANN MARTIN, )  
35 BRENDA JO RILEY, )  
36 aka "Brenda Grizzle," and )  
37 JOSEPH PRINCIPE, )  
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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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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 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 LITTRELL 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 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

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Foreperson

DEBRA W. YANG  
United States Attorney

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