



10-CR-00336-INDI

Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington.

*November 10 20 10*  
WILLIAM M. McCOOL, Clerk  
By *Justin H. Thomas* Deputy

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
COLTON HARRIS-MOORE,  
Defendant.

NO. **CR 10 0336 RAT**  
INDICTMENT

The Grand Jury charges that:

**COUNT ONE**  
**(Interstate Transportation of a Stolen Aircraft)**

On or about September 29, 2009, at Granite Falls, within the Western District of Washington, COLTON HARRIS-MOORE did unlawfully transport in interstate commerce a stolen aircraft, that is, one 2005 Cessna T182T, from the State of Idaho to the State of Washington, knowing the same to be stolen.

All in violation of Title 18, United States Code, Section 2312.

1 **COUNT TWO**  
2 **(Interstate and Foreign Transportation of a Stolen Firearm)**

3 Between on or about September 24, 2009, and October 4, 2009, at Granite Falls,  
4 within the Western District of Washington, COLTON HARRIS-MOORE knowingly  
5 transported in interstate and foreign commerce, from British Columbia, Canada, through  
6 the State of Idaho, to the State of Washington, a stolen firearm, that is, a .32 caliber pistol,  
7 knowing and having reasonable cause to know the firearm was stolen.

8 All in violation of Title 18, United States Code, Sections 922(i) and 924(a)(2).  
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10 **COUNT THREE**  
11 **(Fugitive in Possession of a Firearm)**

12 Beginning on or about October 1, 2009, and continuing until a time unknown, but  
13 before May 6, 2010, at Granite Falls and elsewhere, within the Western District of  
14 Washington, COLTON HARRIS-MOORE, then being a fugitive from justice, did  
15 knowingly possess in and affecting interstate commerce a firearm, that is, a Jennings .22  
16 caliber pistol, said firearm having been shipped or transported in interstate commerce.

17 All in violation of Title 18, United States Code, Sections 922(g)(2) and 924(a)(2).  
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19 **COUNT FOUR**  
20 **(Piloting an Aircraft Without a Valid Airman's Certificate)**

21 On or about February 10, 2010, at Anacortes and elsewhere, within the Western  
22 District of Washington, COLTON HARRIS-MOORE knowingly and willfully did serve  
23 and attempt to serve in any capacity as an airman, without an airman's certificate  
24 authorizing him to serve in that capacity.

25 All in violation of Title 49, United States Code, Section 46306(b)(7).  
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1 **COUNT FIVE**  
2 **(Interstate Transportation of a Stolen Vessel)**

3 On or about May 31, 2010, at Ilwaco, within the Western District of Washington,  
4 COLTON HARRIS-MOORE did unlawfully transport in interstate commerce a stolen  
5 vessel, that is, one 34' Ocean Sport, from the State of Washington to the State of Oregon,  
6 knowing the same to be stolen.

7 All in violation of Title 18, United States Code, Section 2312.

8 **ALLEGATION OF FORFEITURE**

9  
10 1. The allegations contained in Counts One, Two, Three, and Five of this  
11 Indictment are hereby realleged and incorporated by reference for the purpose of alleging  
12 forfeitures to the United States of America pursuant to Title 18, United States Code,  
13 Sections 924 and 982(a)(5), and Title 28, United States Code, Section 2461(c).

14 2. Upon conviction of the offense(s) alleged in Count One or Count Five of  
15 this Indictment, the defendant, COLTON HARRIS-MOORE, shall forfeit to the United  
16 States any property, real or personal, which represents or is traceable to the gross  
17 proceeds obtained, directly or indirectly, as a result of such violation, pursuant to Title 18,  
18 United States Code, Section 982(a)(5).

19 3. Upon conviction of the offense(s) alleged in Count Two or Count Three of  
20 this Indictment, the defendant, COLTON HARRIS-MOORE, shall forfeit to the United  
21 States any firearms involved in the commission of the offense(s), including, but not  
22 limited to:

23 Count Two: One .32 caliber pistol;

24 Count Three: One Jennings .22 caliber pistol.

25 All pursuant to Title 18, United States Code, Section 924(d), and Title 28, United  
26 States Code, Section 2461(c).

27 4. If any forfeitable property, as a result of any act or omission of the  
28 defendant—

- 1 (a) cannot be located upon the exercise of due diligence;
- 2 (b) has been transferred or sold to, or deposited with, a third party;
- 3 (c) has been placed beyond the jurisdiction of the court;
- 4 (d) has been substantially diminished in value; or,
- 5 (e) has been commingled with other property which cannot be divided without
- 6 difficulty;

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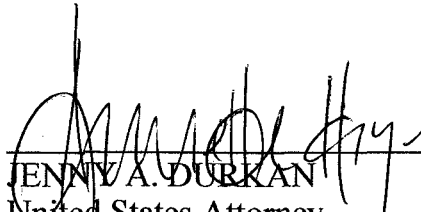
1 the United States of America shall be entitled to forfeiture of substitute property pursuant  
2 to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States  
3 Code, Section 2461(c).

4 All pursuant to 18 U.S.C. §§ 924 and 982(a)(5), and 28 U.S.C. § 2461(c).

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7 A TRUE BILL:  
8 DATED:

9 *Signature of foreperson redacted pursuant to*  
10 *the policy of the Judicial Conference of the*  
11 *United States*

12 \_\_\_\_\_  
13 FOREPERSON

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15 \_\_\_\_\_  
16 JENNY A. DURKAN  
17 United States Attorney

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19 \_\_\_\_\_  
20 ANDREW C. FRIEDMAN  
21 Assistant United States Attorney

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24 DARWIN P. ROBERTS  
25 Assistant United States Attorney  
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