



SEALED

Office of the United States Attorney
District of Nevada
501 Las Vegas Boulevard, Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336

FILED	RECEIVED
ENTERED	SERVED ON
COUNSEL/PARTIES OF RECORD	
JUN 14 2017	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

STEVEN W. MYHRE
Acting United States Attorney
Nevada Bar No. 9635
DAVID L. JAFFE
Acting Chief
Organized Crime and Gang Section
Department of Justice
DAVID N. KARPEL
Trial Attorney
Organized Crime and Gang Section
Department of Justice
CRISTINA D. SILVA
Assistant United States Attorney
Nevada Bar No. 13760
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
PHONE: (702) 388-6336
FAX: (702) 388-5087
david.karpel@usdoj.gov
cristina.silva@usdoj.gov
Representing the United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

-oOo-

UNITED STATES OF AMERICA,

PLAINTIFF,

v.

PASTOR FAUSTO PALAFOX,
a/k/a "TaTa,"
ALBERT LOPEZ,
a/k/a "Al,"
ALBERT BENJAMIN PEREZ,
a/k/a "Dragon Man,"
JAMES PATRICK GILLESPIE,
a/k/a "Jimbo,"
ANDREW ELOY LOZANO,
a/k/a "Hulk,"
ERNESTO MANUEL GONZALEZ,
a/k/a "Romeo,"

**SEALED SUPERSEDING
CRIMINAL INDICTMENT**

Case No: 2:16-CR-00265

VIOLATIONS:

18 U.S.C. § 1962(d): Conspiracy to
Participate in a Racketeering Enterprise

18 U.S.C. § 1959(a)(1): Violent Crime in Aid
of Racketeering – Murder

18 U.S.C. § 924(j)(1): Using and Carrying a
Firearm to Commit Murder During and in
Relation to a Crime of Violence

1 VICTOR ADAM RAMIREZ,
a/k/a "Slick,"
2 JAMES WALTER HENDERSON,
a/k/a "CJ,"
3 STEVEN EARL CARR,
a/k/a "Big Steve,"
4 ROBERT ALAN COLEMAN,
a/k/a "Mayhem,"
5 JEREMY JOHN HALGAT,
a/k/a "Maniak,"
6 PAUL JEFFREY VOLL,
a/k/a "Shyster,"
7 JOHN JOSEPH SIEMER,
a/k/a "Rocky,"
8 BRADLEY MICHAEL CAMPOS,
a/k/a "Candy Man,"
9 CESAR VAQUERA MORALES,
a/k/a "C,"
10 DIEGO CHAVEZ GARCIA,
a/k/a "Boo,"
11 EDWARD CLARIDAN CHELBY,
a/k/a "Recon,"
12 JOHNNY RUSSELL NEDDENRIEP,
a/k/a "Johnny Bolts,"
13 DARIN KIETH GRIEDER,
a/k/a "Midget,"
14 THOMAS GRANVILLE GARRETSON,
a/k/a "Tommy Guns,"
15 BERT WAYNE DAVISSON,
a/k/a "Flash," and
16 MATHEW KEITH DUNLAP,
a/k/a "Big Mat,"
17 JOHN CHRISPIN JUAREZ,
a/k/a "Quicky,"

18 DEFENDANTS,
19
20
21

18 U.S.C. § 1959(a)(1): Violent Crime in Aid
of Racketeering – Kidnapping

18 U.S.C. 1959(a)(3): Violent Crime in Aid
of Racketeering – Assault Resulting in Serious
Bodily Injury

21 U.S.C. 846, 841(a)(1), and 841(b)(1)(A): Conspiracy
to Possess with Intent to Deliver a Controlled Substance

18 U.S.C. 924(c)(1)(A)(i): Using and Carrying
a Firearm During and in Relation to a Crime of
Violence

18 U.S.C. § 2119(2): Taking of Motor Vehicle

18 U.S.C. § 2: Aiding and Abetting

22 THE GRAND JURY CHARGES THAT:
23
24

COUNT ONE

Conspiracy to Participate in a Racketeering Enterprise

Introduction

THE RACKETEERING ENTERPRISE: THE VAGOS OUTLAW MOTORCYCLE GANG

1. At all times relevant to this superseding indictment,

PASTOR FAUSTO PALAFOX, a/k/a "TaTa,"
ALBERT LOPEZ, a/k/a "Al,"
ALBERT BENJAMIN PEREZ, a/k/a "Dragon Man,"
JAMES PATRICK GILLESPIE, a/k/a "Jimbo,"
ANDREW ELOY LOZANO, a/k/a "Hulk,"
ERNESTO MANUEL GONZALEZ, a/k/a "Romeo,"
VICTOR ADAM RAMIREZ, a/k/a "Slick,"
JAMES WALTER HENDERSON, a/k/a "CJ,"
STEVEN EARL CARR, a/k/a "Big Steve,"
ROBERT ALAN COLEMAN, a/k/a "Mayhem,"
JEREMY JOHN HALGAT, a/k/a "Maniak,"
PAUL JEFFREY VOLL, a/k/a "Shyster,"
JOHN JOSEPH SIEMER, a/k/a "Rocky,"
BRADLEY MICHAEL CAMPOS, a/k/a "Candy Man,"
CESAR VAQUERA MORALES, a/k/a "C,"
DIEGO CHAVES GARCIA, a/k/a "Boo Boo,"
EDWARD CLARIDAN CHELBY, a/k/a "Recon,"
JOHNNY RUSSELL NEDDENRIEP, a/k/a "Johnny Bolts,"
DARIN KIETH GRIEDER, a/k/a "Midget,"
THOMAS GRANVILLE GARRETSON, a/k/a "Tommy Guns,"
BERT WAYNE DAVISSON, a/k/a "Flash,"
MATHEW KEITH DUNLAP, a/k/a "Big Mat," and
JOHN CHRISPIN JUAREZ, a/k/a "Quicky,"

defendants herein, and others known and unknown to the Grand Jury, were members and associates of the Vagos Outlaw Motorcycle Gang ("Vagos OMG"), a criminal organization whose members and associates engaged in, among other criminal activities, narcotics distribution, firearms trafficking, and acts of violence involving murder, kidnapping, assault, extortion, robbery, and witness intimidation. At

1 all relevant times, the Vagos OMG operated throughout California, Arizona, Hawaii, Oregon, and the
2 State and District of Nevada, including the City of Las Vegas, and elsewhere.

3 **Structure and Operation of the Enterprise**

4 2. The structure and operation of the Vagos OMG included, but was not limited to, the
5 following:

6 a. The Vagos OMG was formed in the City of San Bernardino, California in the
7 mid-1960's. The term "Vagos" is Spanish for "lazy" and referred to a person characterized generally as
8 a vagabond. The organization was formed by a group of motorcyclists who held other local motorcycle
9 gangs in contempt. The Vagos OMG adopted the color green as background for the lettering of its
10 "cuts" (defined below) and called itself the "Green Nation." Vagos OMG members were
11 predominantly Hispanic and Caucasian and at least 21-years of age.

12 b. The Vagos OMG grew into an international organization with approximately
13 87 or more chapters in at least seven countries, on four continents, and approximately 75 chapters in the
14 United States, including approximately 54 chapters in Nevada and California. The Vagos OMG
15 membership has been estimated at between 900 and 1,000 members.

16 c. The Vagos OMG was a highly organized criminal organization which
17 adhered to a hierarchical chain of command internationally, nationally, and locally. National officers
18 were the most powerful and influential members of the enterprise. The term "national" and/or
19 "international" officer was used interchangeably as the enterprise grew internationally. National
20 officers exercised authority over the actions of individual Vagos OMG members. Vagos OMG
21 chapters paid money to the national officers in the form of fees, dues, and "taxes." The national
22 officers collected and reviewed all membership applications and fees for membership, resolved disputes
23 within the organization, and approved the award of incentives. Such incentives included tattoos and
24

1 Vagos OMG "patches" (i.e., cloth insignia denoting phrases or symbols unique to the organization)
2 given to Vagos OMG members who committed acts of violence on behalf of the enterprise, incurred
3 physical injury on behalf of the enterprise, or performed specific sexual acts at Vagos OMG events.

4 d. Elected leaders governed the gang at the international, national, and chapter
5 levels. Elections for the international president and international vice president were held at the first
6 annual meeting of all chapter officers. The international president appointed an international sergeant-
7 at-arms, an international secretary/treasurer, and an international road captain. Chapters had the same
8 leadership structure, including one or more sergeants-at-arms, and separate offices for the secretary
9 and/or treasurer. The "Nomad" chapter reported directly to the international president. The Nomad
10 chapter consisted of members who were not tied to any specific geographic area or who had at least ten
11 years of service. Nomad members recruited new Vagos OMG members and mentored Vagos OMG
12 chapters.

13 e. The Vagos OMG had a detailed and uniform organizational structure, which was
14 outlined – along with various rules, procedures, and code of conduct – in a written
15 "International/National Bylaws," widely distributed to members throughout the enterprise.

16 f. Local chapters were divided according to geographic location. Each local chapter
17 must have had at least six members to exist and had to be approved by the national leadership to be
18 established. The enterprise was operated through a strict chain of command. Each Vagos OMG chapter
19 had a president, a vice-president, a secretary and/or treasurer, a sergeant-at-arms, and a road captain,
20 along with members. Each officer had specific obligations to the enterprise and each was responsible
21 for maintaining records and providing information or security for the chapter.

22 g. The international president served as the point of contact for the other "1%" motorcycle
23 gangs to discuss territorial issues. The "1%" symbol had become the symbol of the outlaw biker. The
24

1 “1%” symbol was derived from an apocryphal statement that 99% of the country’s motorcyclists were
2 law-abiding individuals. The international president also approved or disapproved the existence of
3 each “support club,” along with the patches each can wear. Support clubs were subordinate but
4 affiliated motorcycle clubs that supported the dominant club’s activities and were permitted to wear the
5 same colors as the dominant club. Each chapter president was responsible for support clubs that
6 affiliated with the Vagos OMG as well as the Confederation of Clubs (an amalgamation of motorcycle
7 organizations who banded together to promote common interests) operating within the same
8 geographical area. Some support clubs wore the reverse color scheme patch (green letters on a white
9 background) to show their allegiance to the Vagos OMG. These support clubs were also referred to as
10 “farm clubs” because they were a recruiting tool for the Vagos OMG to pick individuals to prospect for
11 membership in the Vagos OMG.

12 h. The president was the highest-ranking officer in each chapter. Each president was
13 responsible for holding regular chapter meetings, also known as “church.” Presidents were required to
14 attend regularly-held international president’s meetings and also the mandatory Vagos OMG “runs”
15 (i.e., when members wore their “colors” and travelled in groups on their motorcycles to a meeting
16 location). The sergeant-at-arms of each chapter was in charge of security and enforcement activities
17 related to the chapter. The secretary and/or treasurer for the chapter was responsible for keeping
18 current contact information for all its members as well as for all other secretaries/treasurers so that
19 information could be disseminated; maintaining the patches of retired Vagos OMG members;
20 maintaining records of bank accounts and club funds; collecting fines, dues, and “donations” from
21 support clubs; and paying monies to the international treasurer. Each Vagos OMG member was also
22 required to attend meetings, runs, and pay chapter and national dues. Each member was also required
23
24

1 to pay a fine if a mandatory run was missed and was obligated to pledge his motorcycle and title to the
2 enterprise.

3 i. The Vagos OMG was a closed society. Allegiance to this organization and its
4 fellow members was valued above all else. Vagos OMG members referred to one another as "brothers"
5 and to the organization as a "brotherhood." Witnesses to their criminal acts were typically the victims
6 of acts of obstruction, intimidation, and harassment who were too afraid to approach law enforcement
7 or testify in court proceedings. Vagos OMG members did not fear authority and had a complete
8 disdain for the rules of society. The Vagos OMG was very careful about admitting individuals into the
9 enterprise. There was a lengthy process before one could become a "full patched" member, as defined
10 below. This process was designed to guard against law enforcement infiltration into the enterprise.
11 First, the prospective member was allowed to associate with enterprise members. After a period of
12 time, the prospective member was identified as a "hangaround" and obligated to perform menial tasks
13 for full patched members. The next phase was that the person became a "prospect" which required
14 being sponsored by a full patched member. The club members would then vote on whether the
15 "prospect" could become a full patched member.

16 j. Full patched members were required to own a Harley Davidson motorcycle or
17 facsimile and wear clothing with patches that symbolized the club. Those patches were commonly
18 known as club "colors." Vagos OMG members wore distinctive patches, or colors, on the back of
19 denim vests called "cuts" (the collars and sleeves were cut off). Vagos OMG colors were composed of
20 a two-piece patch. The Vagos OMG emblem was centered on the back of the cuts on a dark-green
21 background. The emblem consisted of a caricature of a red figure on a winged wheel holding a scroll
22 with the word Vagos written in light-green letters. The letters M and C (Motorcycle Club) were written
23 in light green to the left and right of the figure. The Vagos OMG emblem, designed by an imprisoned
24

1 Vagos OMG member, depicted the Norse god, Loki, the god of mischief. The bottom patch (also
2 called a "rocker") was separate from the center patch and denoted the location of the wearer's chapter
3 with the same light-green lettering on a pale-green background (i.e., Nevada, California, etc.). Vagos
4 OMG members wore shirts, hats, bandannas, and other articles of clothing in the same pale-green color
5 to show their affiliation with the Vagos OMG. Many full patched members also wore a diamond-
6 shaped "1%" patch. Members who wore their Vagos OMG "colors" did so with the authority of the
7 Vagos OMG. Members were required to wear their "colors" when riding their motorcycles and when
8 attending a national run or Vagos OMG events. When attending a national run, and at other times,
9 some Vagos OMG members travelled with Vagos OMG merchandise to sell at the destination. Only
10 Vagos OMG members and close associates with permission could sell Vagos OMG merchandise, and a
11 portion of the sales was funneled back to the enterprise.

12 k. National officers would award specific patches to Vagos OMG members
13 who had distinguished themselves. Such patched awards included an "MF" or "Loki Head" diamond-
14 shaped patch that signified commission of murder or acts of violence on behalf of the Vagos OMG; a
15 "22" patch represented "V" for Vagos, which is the 22nd letter of the alphabet; a safety pin worn on the
16 "cut" symbolized the phrase "my area is pinned down;" a "wings" patch symbolized commission of a
17 sex act in the presence of other gang members; the "VFFV" patch symbolized "Vagos Forever, Forever
18 Vagos," and the "We Give What We Get" patch, which reinforced the high level of respect Vagos
19 OMG members expected from rival gangs as well as members of the public, including law
20 enforcement.

21 1. Vagos OMG members enforced their authority through direct attacks against
22 rival motorcycle gangs, such as the "Hells Angels," the "POBOBs," (Pissed Off Bastards of
23 Bloomington) and the "Bandidos," as well as members of the general public who came in contact with
24

1 the Vagos OMG in a manner, whether intentionally or unintentionally, deemed "disrespectful" by the
2 organization. Vagos OMG members travelled often to areas claimed by rival gang members in order to
3 provoke confrontation. Rival gang members were often forced to surrender their "cuts" and "colors" or
4 faced beatings or death.

5 m. Vagos OMG members, prospects, and members of support clubs were
6 required to pay dues on a monthly basis. A portion of these dues were forwarded to the international
7 leadership. Support club dues were often referred to as "donations." "Taxes" were assessed on
8 individual members at various times, with the proceeds also being funneled up the Vagos OMG chain
9 to the international leadership. The dues and taxes helped fund the continued operation of the
10 enterprise and were used for a variety of purposes, including the payment of expenses to the
11 international leadership, covering funeral expenses of members, contributing to a legal defense fund for
12 members, and paying costs associated with planned trips or "runs." The enterprise also raised funds for
13 its activities and to pay the legal defense fees for charged members through unlawful gambling
14 activities, such as raffles.

15 n. The Vagos OMG maintained an inventory of firearms, including handguns,
16 shotguns, and semi-automatic assault rifles, in order to enforce its authority and intimidate rival gangs.
17 Such weapons were often stolen or unregistered in an attempt to conceal their connection to the Vagos
18 OMG.

19 o. Vagos leaders had the authority within the organization to issue direct orders and
20 mete out punishment. A direct order was an assignment given to a subordinate Vagos OMG member
21 that would serve a purpose for the Vagos OMG. The direct order could range from a leader ordering a
22 "S.O.S" (smash on sight), meaning the assault of a rival gang member or of a Vagos OMG member
23 who had committed a violation of the Vagos OMG rules, to a "green light" or "X," meaning the murder
24

1 of a rival gang member or of a Vagos OMG member who had committed an egregious violation of the
 2 gang's rules. Failure to perform a direct order resulted in the assigned member being in violation of the
 3 rules. Punishment for failing to complete a direct order could range anywhere from a beating to death.

4 p. While females were not allowed to become members of the Vagos OMG, those who
 5 associated with the Vagos OMG and engaged in criminal activity for the benefit of the Vagos OMG
 6 were often referred to as "VOL's" (Vagos Ol Lady) or the "property of" Vagos OMG members.
 7 Associates who did not fulfill their obligation to the Vagos OMG were sometimes subjected to
 8 violence, including murder. Female associates were frequently called upon to carry narcotics and/or
 9 firearms for members of the gang.

10 The Racketeering Enterprise

11 3. The Vagos OMG, including its leaders, members, and associates, constituted an "enterprise,"
 12 as defined in Title 18, United States Code, Section 1961(4) (hereafter "the enterprise"), that is, a group
 13 of individuals associated in fact. The enterprise constituted an ongoing organization whose members
 14 and associates, including its prospects, functioned as a continuing unit for a common purpose of
 15 achieving the objectives of the enterprise. This enterprise was engaged in, and its activities affected,
 16 interstate and foreign commerce.

17 The Defendants

18 4. At various times relevant to this superseding indictment, the following individuals, among
 19 others, were members or associates of the Vagos OMG in the various capacities set forth below:

20 **PASTOR FAUSTO PALAFOX**, a/k/a "TaTa,"
 21 **ALBERT LOPEZ**, a/k/a "Al,"
JAMES PATRICK GILLESPIE, a/k/a "Jimbo,"
VICTOR ADAM RAMIREZ, a/k/a "Slick,"
 22 **STEVEN EARL CARR**, a/k/a "Big Steve,"
ROBERT ALAN COLEMAN, a/k/a "Mayhem,"
 23 **PAUL JEFFREY VOLL**, a/k/a "Shyster,"
 24 **JOHN JOSEPH SIEMER**, a/k/a "Rocky,"

JOHNNY RUSSELL NEDDENRIEP, a/k/a "Johnny Bolts,"
DARIN KIETH GRIEDER, a/k/a "Midget,"
MATHEW KEITH DUNLAP, a/k/a "Big Mat," and
JOHN CHRISPIN JUAREZ, a/k/a "Quicky,"

each held the rank of "International President," "Chapter President," and/or "Chapter Vice President" of the Vagos OMG enterprise, and directed other members and associates of the enterprise in carrying out unlawful and other activities in furtherance of the conduct of the enterprise's affairs. As leaders,

PASTOR FAUSTO PALAFOX, a/k/a "TaTa,"
ALBERT LOPEZ, a/k/a "Al,"
JAMES PATRICK GILLESPIE, a/k/a "Jimbo,"
VICTOR ADAM RAMIREZ, a/k/a "Slick,"
STEVEN EARL CARR, a/k/a "Big Steve,"
ROBERT ALAN COLEMAN, a/k/a "Mayhem,"
PAUL JEFFREY VOLL, a/k/a "Shyster,"
JOHN JOSEPH SIEMER, a/k/a "Rocky,"
JOHNNY RUSSELL NEDDENRIEP, a/k/a "Johnny Bolts,"
DARIN KIETH GRIEDER, a/k/a "Midget,"
MATHEW KEITH DUNLAP, a/k/a "Big Mat," and
JOHN CHRISPIN JUAREZ, a/k/a "Quicky,"

were responsible for, among other things, coordinating criminal activity with other Vagos OMG leaders throughout the United States and abroad; supervising the criminal activities of the members and associates of the Vagos OMG enterprise; issuing orders to kill rival gang members and subordinate gang members whom they believed had violated Vagos OMG rules of conduct; and presiding over Vagos OMG meetings where criminal activity was discussed, proceeds from criminal activity were collected including, but not limited to, collection of drug proceeds from subordinate gang members, and beatings of fellow Vagos OMG gang members were administered. In addition, apart from supervising and directing the criminal activities of the members and associates of the Vagos OMG enterprise,

1 PASTOR FAUSTO PALAFOX, a/k/a "TaTa,"
 2 ALBERT LOPEZ, a/k/a "Al,"
 3 JAMES PATRICK GILLESPIE, a/k/a "Jimbo,"
 4 VICTOR ADAM RAMIREZ, a/k/a "Slick,"
 5 STEVEN EARL CARR, a/k/a "Big Steve,"
 6 ROBERT ALAN COLEMAN, a/k/a "Mayhem,"
 7 PAUL JEFFREY VOLL, a/k/a "Shyster,"
 8 JOHN JOSEPH SIEMER, a/k/a "Rocky,"
 9 JOHNNY RUSSELL NEDDENRIEP, a/k/a "Johnny Bolts,"
 10 DARIN KIETH GRIEDER, a/k/a "Midget,"
 11 MATHEW KEITH DUNLAP, a/k/a "Big Mat," and
 12 JOHN CHRISPIN JUAREZ, a/k/a "Quicky,"

13 also participated in the criminal activities of the Vagos OMG enterprise. Among their criminal
 14 activities were acts involving murder, kidnapping, assault, intimidation of witnesses and victims,
 15 narcotics trafficking, and weapons trafficking.

16 a. ALBERT BENJAMIN PEREZ, a/k/a "Dragon Man," ANDREW ELOY
 17 LOZANO, a/k/a "Hulk," ERNESTO MANUEL GONZALEZ, a/k/a "Romeo," JAMES WALTER
 18 HENDERSON, a/k/a "CJ," and JEREMY JOHN HALGAT, a/k/a "Maniak," each held the rank of
 19 "International Sergeant-at-Arms," Regional Sergeant-at-Arms," and/or "Chapter Sergeant-at-Arms" of
 20 the Vagos OMG enterprise, and directed other members and associates of the enterprise in carrying out
 21 unlawful and other activities in furtherance of the conduct of the enterprise's affairs. As leaders and
 22 gang enforcers, ALBERT BENJAMIN PEREZ, a/k/a "Dragon Man," ANDREW ELOY LOZANO,
 23 a/k/a "Hulk," ERNESTO MANUEL GONZALEZ, a/k/a "Romeo," JAMES WALTER
 24 HENDERSON, a/k/a "CJ," and JEREMY JOHN HALGAT, a/k/a "Maniak," were responsible for,
 among other things, carrying out the orders of senior gang leaders; coordinating criminal activity with
 other Vagos OMG chapter leaders throughout the United States and abroad; supervising the criminal
 activities of the members and associates of the Vagos OMG enterprise; issuing orders to kill rival gang
 members and subordinate gang members whom they believed had violated Vagos OMG rules of

conduct; and presiding over Vagos OMG meetings where criminal activity was discussed, proceeds from criminal activity were collected including, but not limited to, collection of drug proceeds from subordinate gang members, and beatings of fellow Vagos OMG gang members were administered. In addition, apart from supervising and directing the criminal activities of the members and associates of the Vagos OMG enterprise, **ALBERT BENJAMIN PEREZ**, a/k/a "Dragon Man", a/k/a "Al," **ANDREW ELOY LOZANO**, a/k/a "Hulk," **ERNESTO MANUEL GONZALEZ**, a/k/a "Romeo," **JAMES WALTER HENDERSON**, a/k/a "CJ," and **JEREMY JOHN HALGAT**, a/k/a "Maniak," also participated in the criminal activities of the Vagos OMG enterprise. Among their criminal activities were acts involving murder, kidnapping, assault, intimidation of witnesses and victims, narcotics trafficking, and weapons trafficking.

Purposes of the Enterprise

5. The purposes of the enterprise included, but were not limited to, the following:

- a. Enriching the leaders, members, and associates of the enterprise through, among other things, interstate transportation of stolen goods, and illegal trafficking of controlled substances and firearms, often in interstate and foreign commerce.
- b. Preserving, protecting, and enhancing the power, territory, reputation, and profits of the enterprise through the use of threats, intimidation, violence, and destruction, including, but not limited to, acts involving murder, assault, obstruction of justice, and other acts of violence.
- c. Promoting and enhancing the enterprise and its members' and associates' activities.
- d. Keeping victims in fear of the enterprise and in fear of its leaders, members, and associates through threats of violence and actual violence.

1 e. Providing financial support to gang members who were charged with or
2 incarcerated for gang-related activities.

3 **Means and Methods of the Enterprise**

4 6. The means and methods by which the leaders, members, and
5 associates conducted and participated in the conduct of the affairs of the Vagos OMG criminal
6 enterprise included the following:

7 a. The leaders of the enterprise directed, sanctioned, approved, and permitted
8 other members and associates of the enterprise to carry out acts in furtherance of the enterprise.

9 b. Members of the enterprise and their associates committed, conspired to
10 commit, and threatened to commit acts of violence, including murder, attempted murder, kidnapping,
11 robbery, assault, intimidation, and extortion to protect the enterprise's power, territory, and property.

12 c. To generate income, Vagos OMG members and associates engaged in
13 illegal activities under the protection of the enterprise, including narcotics trafficking, weapons
14 trafficking, and other illegal activities.

15 d. For protection, attacks, and armed combat, Vagos OMG members
16 and associates acquired, carried, and used firearms.

17 e. Members and associates of the enterprise employed and used
18 gang-related terminology, symbols, phrases, and gestures to demonstrate affiliation with the gang.

19 f. To perpetuate the enterprise and to maintain and extend their power,
20 members and associates of the enterprise committed and conspired to commit acts including murder,
21 attempted murder, intimidation, and assault against individuals who posed a threat to the enterprise or
22 jeopardized its operations, including rival motorcycle organizations, Vagos OMG members, and
23 witnesses to illegal activities of the enterprise.
24

g. Members and associates of the enterprise talked in code when communicating over the telephone to avoid law enforcement detection, and communication in person was always preferable.

h. Members of the enterprise and their associates were forbidden from cooperating with law enforcement. Attorney's fees were paid for by the enterprise when members and associates were arrested for gang-related crimes to help ensure silence was maintained. Legal paperwork was reviewed for signs of cooperation.

The Racketeering Conspiracy

7. Beginning in 2005, and continuing through on or about the date of this Superseding Indictment, in the State and District of Nevada, the Southern, Central and Northern Districts of California, and elsewhere, the defendants,

PASTOR PALAFOX, a/k/a "TaTa,"
ALBERT LOPEZ, a/k/a "Al,"
ALBERT BENJAMIN PEREZ, a/k/a "Dragon Man,"
JAMES PATRICK GILLESPIE, a/k/a "Jimbo,"
ANDREW ELOY LOZANO, a/k/a "Hulk,"
ERNESTO MANUEL GONZALEZ, a/k/a "Romeo,"
VICTOR ADAM RAMIREZ, a/k/a "Slick,"
JAMES WALTER HENDERSON, a/k/a "CJ,"
STEVEN EARL CARR, a/k/a "Big Steve,"
ROBERT ALAN COLEMAN, a/k/a "Mayhem,"
JEREMY JOHN HALGAT, a/k/a "Maniak,"
PAUL JEFFREY VOLL, a/k/a "Shyster,"
JOHN JOSEPH SIEMER, a/k/a "Rocky,"
JOHNNY RUSSELL NEDDENRIEP, a/k/a "Johnny Bolts,"
DARIN KIETH GRIEDER, a/k/a "Midget,"
MATHEW KEITH DUNLAP, a/k/a "Big Mat," and
JOHN CHRISPIN JUAREZ, a/k/a "Quicky,"

being persons employed by and associated with the Vagos OMG, an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, and others known and unknown to the Grand Jury, did knowingly and intentionally conspire to conduct and participate, directly and indirectly,

1 in the conduct of the affairs of the enterprise through a pattern of racketeering activity, as defined in

2 Sections 1961(1) and (5) of Title 18, United States Code, consisting of multiple acts involving

3 a. Murder, in violation of Nevada Revised Statutes Sections 200.010, 200.030, 193.330,
4 195.020, and 199.480; California Penal Code Sections 187, 189, 21a, 664, 31, and 182; New Mexico
5 Statutes Sections 30-2-1, 30-28-1, 30-28-2, and 30-1-13; and Arizona Revised Statutes Sections 13-
6 1105, 13-1104, 13-1001, 13-303, and 13-1003;

7 b. Kidnapping, in violation of Nevada Revised Statutes Sections 200.310, 200.320,
8 193.330, 195.020, and 199.480; and California Penal Code Sections 207, 209, 21a, 664, 31, and 182;

9 c. Robbery, in violation of Nevada Revised Statutes Sections 200.380, 193.330, 195.020,
10 and 199.480; California Penal Code Sections 211, 21a, 664, 31, and 182; New Mexico Statutes
11 Sections 30-16-2, 30-28-1, 30-28-2, and 30-1-13; and Arizona Revised Statutes Sections 13-1902, 13-
12 1001, 13-303, and 13-1003; and

13 d. Extortion, in violation of Nevada Revised Statutes Sections 205.320, 193.330, 195.020,
14 and 199.480; and California Penal Code Sections 518, 31, and 182; and

15 Acts indictable under Title 18, United States Code Section:

16 e. 1512 (relating to tampering with a witness, victim, or an informant);

17 f. 1513 (relating to retaliating against a witness, victim, or an informant);

18 g. 2312 (transportation of stolen vehicles); and

19 h. 2313 (sale or receipt of stolen vehicles); and

20 Offenses involving:

21 i. Narcotics trafficking, in violation of Sections 841(a)(1) (distribution and possession with
22 the intent to distribute a controlled substance) and 846 (conspiracy to distribute and possess with the
23 intent to distribute a controlled substance), of Title 21, United States Code.

1 It was a part of the conspiracy that each defendant agreed that a conspirator would commit at least two
2 acts of racketeering activity in the conduct of the affairs of the enterprise.

3 **OVERT ACTS**

4 8. In furtherance of the conspiracy and to achieve the objective thereof, the defendants,
5 and others, performed and caused to be performed the following overt acts, among others, in the State
6 and District of Nevada, the Southern, Central, and Northern Districts of California, and elsewhere:

7 1) On or about January 15, 2005, **JAMES PATRICK GILLESPIE**, a/k/a "Jimbo,"
8 beat a female bar employee unconscious, while fellow unindicted Vagos gang members attacked and
9 beat other employees at the Evolutions Cocktail Lounge in Los Angeles, California.

10 2) In or about 2006, **PASTOR FAUSTO PALAFOX**, a/k/a "TaTa," ordered a
11 subordinate gang member to inflict violence upon another gang member who failed to pay an
12 outstanding drug debt to a rival motorcycle gang.

13 3) On or about June 17, 2009, **STEVEN EARL CARR**, a/k/a "Big Steve," and
14 **ROBERT ALAN COLEMAN**, a/k/a "Mayhem," and other unindicted gang members, beat and
15 severely injured a fellow gang member, stole his motorcycle, wallet, money, and credit cards, and
16 forced him to surrender his gang clothing because he failed to pay a "tax" to the Vagos OMG
17 enterprise.

18 4) Beginning in at least 2010, and continuing through the date of this
19 superseding indictment, members of the Vagos OMG transported controlled substances including but
20 not limited to cocaine and methamphetamine from Mexico to the United States by concealing the
21 narcotics in motorcycle storage compartments and smuggling them through United States Border Patrol
22 checkpoints.

1 5) On or about February 13, 2010, **ERNESTO MANUEL GONZALEZ**, a/k/a

2 "Romeo," possessed metal knuckles and a loaded handgun during a traffic stop by law enforcement.
3 **GONZALEZ** admitted that he carried the handgun because of his "lifestyle," and protection against
4 the rival "Hells Angels."

5 6) On or about August 30, 2010, in a recorded telephone call using coded

6 language, **ANDREW ELOY LOZANO**, a/k/a "Hulk," discussed the need to retaliate against rival
7 "Brotherhood" gang members whom the Vagos believed were responsible for the murder of a fellow
8 gang member.

9 7) On or about September 5, 2010, in a recorded telephone call, **ANDREW**

10 **ELOY LOZANO**, a/k/a "Hulk," demanded backup from fellow Vagos members to counterattack rival
11 "Hells Angels" gang members in Williams, Arizona. **LOZANO** stated "it's four of us bro, with, uh
12 about three f*cking weapons between ourselves."

13 8) On or about September 29, 2010, in a recorded telephone call, **ANDREW**

14 **ELOY LOZANO**, a/k/a "Hulk," ordered the restaurant owner of the Buffalo Inn in Upland, California,
15 to obtain and turn over video surveillance on and contact information of rival "Brotherhood" gang
16 members whom the Vagos OMG believed had booked reservations to celebrate the murder of a Vagos
17 gang member.

18 9) On or about September 30, 2010, **JOHN JOSEPH SIEMER**, a/k/a "Rocky,"

19 and other unindicted Vagos gang members, obtained and sold high-end designer counterfeit
20 merchandise believed to be stolen from Los Angeles-based shipping containers.

21 10) On or about October 30, 2010, in a recorded telephone call, **ANDREW**

22 **ELOY LOZANO**, a/k/a "Hulk," announced his intention to "tune-up" subordinate gang members who
23 failed to pay dues to the Vagos gang.

1 11) On or about November 7, 2010, by recorded telephone call using coded
2 language, **PASTOR FAUSTO PALAFOX**, a/k/a "TaTa," boasted to the former International President
3 of the Vagos OMG that he possessed ultimate power over the Vagos. **PALAFOX** proclaimed, "No one
4 talks for me" and "when I say it's gonna be done" then "it's gonna be done."

5 12) On or about November 9, 2010, in a recorded telephone call, **ANDREW**
6 **ELOY LOZANO**, a/k/a "Hulk," told a fellow gang member, "I had to sit there and f*cking lie for
7 f*cking an hour," in describing his testimony under oath against two Vagos gang members on trial for
8 the murder of a fellow gang member.

9 13) On or about November 13, 2010, in a recorded telephone call, **PASTOR**
10 **FAUSTO PALAFOX**, a/k/a "TaTa," told a subordinate Hawaii chapter member that as long as we
11 (Vagos) "give what we get" and "they don't push us" then "we'll be fine," upon expressing concern
12 over the rival "Hells Angels" rapid growth in Hawaii.

13 14) On or about December 5, 2010, in a recorded telephone call to a Vagos
14 Hawaii chapter member, **PASTOR FAUSTO PALAFOX**, a/k/a "TaTa," issued a "green light" to
15 attack any rival "Hells Angels" support club member who disrespected the Vagos gang in Hawaii.

16 15) On or about December 7, 2010, in a recorded telephone call to a fellow
17 Vagos gang member, **ANDREW ELOY LOZANO**, a/k/a "Hulk," said "we're f*cked" upon learning
18 that law enforcement discovered the remains of a murdered Vagos gang member in a remote area of
19 California.

20 16) On or about December 7, 2010, in a recorded telephone call, **ANDREW**
21 **ELOY LOZANO**, a/k/a "Hulk," admitted that as a government witness he lied under oath to protect
22 two fellow Vagos OMG gang members on trial for murder.

1 17) On or about December 16, 2010, in a recorded telephone call using coded
2 language, **ANDREW ELOY LOZANO**, a/k/a "Hulk," said he would utilize members of a local
3 skinhead gang to kill a subordinate gang member whom the Vagos believed had cooperated with law
4 enforcement.

5 18) On or about December 29, 2010, in a recorded telephone call, **JOHN**
6 **CHRISPIN JUAREZ**, a/k/a "Quickie," told a subordinate Vagos gang member that "If anything gets
7 serious then you take care of it. You should never tell a goddamn person. That's why I'm still here
8 alive," in discussing the fate of two Vagos members on trial for the murder of a Vagos associate.

9 19) On or about December 31, 2010, in a recorded telephone call, **ANDREW**
10 **ELOY LOZANO**, a/k/a "Hulk," agreed to purchase steroids from a fellow Vagos OMG gang member.

11 20) In or about 2011, **ALBERT BENJAMIN PEREZ**, a/k/a "Dragon
12 Man," displayed a gallon-size bag of pills to a subordinate gang member and stated "this is how I make
13 money."

14 21) In or about January 2011, **JOHN JOSEPH SIEMER**, a/k/a "Rocky,"
15 purchased a motorcycle stolen by fellow Vagos members from the home of a deceased Vagos gang
16 member.

17 22) In or about January 2011, **JOHN JOSEPH SIEMER**, a/k/a "Rocky,"
18 ordered a fellow gang member to use his contacts with the Italian mafia to arrange for the murder of the
19 president of the rival "Sons of Silence" motorcycle gang.

20 23) On or about January 17, 2011, in a recorded telephone call using coded
21 language, **PASTOR FAUSTO PALAFOX**, a/k/a "TaTa," agreed with the Vagos international
22 secretary/treasurer that the Vagos should be prepared for retaliation against the rival Texas-based
23 "Bandidos" members in the event the "Bandidos" try to take the Vagos' patches in Texas.
24

1 24) On or about January 30, 2011, in a recorded telephone call, **JOHN**
2 **CHRISPIN JUAREZ**, a/k/a "Quicky," told a subordinate Arizona-based Vagos member that "the
3 talking time is over," and at the end of the day we will "own a few patches ourselves," upon planning
4 retaliation against the rival "Sons of Silence" motorcycle gang.

5 25) On or about January 31, 2011, in a recorded telephone call, **JOHN**
6 **CHRISPIN JUAREZ**, a/k/a "Quicky," told a subordinate Arizona-based Vagos gang member that the
7 Vagos are "gearing up for the payment program," a reference to retaliation against the rival "Sons of
8 Silence."

9 26) On or about January 31, 2011, in a recorded telephone call, **JOHN**
10 **CHRISPIN JUAREZ**, a/k/a "Quicky," issued a "green light" to a subordinate Portland-based Vagos
11 gang member to attack a rival "Sons of Silence" gang member believed to be living in the Portland,
12 Oregon area.

13 27) On or about February 1, 2011, in a recorded telephone call, **JOHN**
14 **CHRISPIN JUAREZ**, a/k/a "Quicky," told a subordinate Mississippi-based Vagos gang member that
15 after the Vagos get their Vagos "cuts" back from the rival "Sons of Silence," that **JUAREZ** would send
16 another Vagos gang member to "wherever you guys are" and "f*cking get that motherf*cker."

17 28) On or about March 20, 2011, in a recorded telephone call, **JOHN JOSEPH**
18 **SIEMER**, a/k/a "Rocky," said "back over the mother f*cker," upon ordering a fellow Vagos member to
19 retaliate against the rival "Hells Angels."

20 29) On or about April 7, 2011, **JOHN JOSEPH SIEMER**, a/k/a "Rocky," and
21 other unindicted Vagos members, obtained high-end designer counterfeit merchandise to sell through
22 fellow Vagos gang members.
23
24

1 30) On or about April 16, 2011, in a recorded telephone call, **JOHN JOSEPH**
2 **SIEMER**, a/k/a "Rocky," called upon members to retaliate against rival "Hells Angels" members for a
3 previous attack of a fellow Vagos member.

4 31) On or about June 12, 2011, at a Vagos "Officers" meeting in Los Angeles,
5 **PASTOR FAUSTO PALAFOX**, a/k/a "TaTa," issued a "green light" against the rival "Hells Angels"
6 and told subordinate Vagos members to "take care of business" and their territory.

7 32) On or about July 15, 2011, **ROBERT ALAN COLEMAN**, a/k/a "Mayhem,"
8 sold and distributed approximately 14.1 grams of methamphetamine to a confidential informant who was
9 also a full-patch Vagos member.

10 33) On or about July 28, 2011, **ROBERT ALAN COLEMAN**, a/k/a "Mayhem,"
11 sold and distributed approximately 28.3 grams of methamphetamine to a confidential informant who was
12 also a full-patch Vagos member.

13 34) On or about September 15, 2011, **JOHNNY RUSSELL NEDDENRIEP**, a/k/a
14 "Johnny Bolts," **DARIN KIETH GRIEDER**, a/k/a "Midget," and **MATHEW KEITH DUNLAP**, a/k/a
15 "Big Mat," and others known and unknown to the grand jury, kidnapped a fellow Vagos gang member
16 at gun point.

17 35) On or about September 15, 2011, **JOHNNY RUSSELL NEDDENRIEP**, a/k/a
18 "Johnny Bolts," **DARIN KIETH GRIEDER**, a/k/a "Midget," and **MATHEW KEITH DUNLAP**,
19 a/k/a "Big Mat," and others known and unknown to the grand jury, beat, severely injured, and robbed a
20 fellow Vagos gang member of his jewelry, firearms, and motorcycle, because the Vagos believed he had
21 violated gang rules.

22 36) On or about September 23, 2011, at a Vagos "All Members" meeting at the Nugget
23 Hotel and Casino in Sparks, Nevada, **PASTOR FAUSTO PALAFOX**, a/k/a "TaTa," stated before the
24

crowd that any Vagos member "down for the club can expect to lose their family, lose their lives, and/or end up in prison." He also shouted "f*ck the rival 'Hells Angels'" and proclaimed that the Vagos would "not be punked around anymore by the "HAs."

37) On or about September 23, 2011, at the Nugget Hotel and Casino in Sparks, Nevada, **PASTOR FAUSTO PALAFOX**, a/k/a "TaTa," **ALBERT LOPEZ**, a/k/a "Al," **ALBERT BENJAMIN PEREZ**, a/k/a "Dragon Man," **JAMES PATRICK GILLESPIE**, a/k/a "Jimbo," and others known and unknown to the grand jury, ordered the murder of rival "Hells Angels" gang member J.P.

38) On or about September 23, 2011, **ALBERT BENJAMIN PEREZ**, a/k/a "Dragon Man," ordered a subordinate Vagos member not to allow rival "Hells Angels" members to get past the elevators on the main floor of the Nugget Hotel and Casino in Sparks, Nevada. **PEREZ** also ordered the subordinate gang member to "go ahead and do it," in confirming the order to kill rival "Hells Angels" gang member J.P.

39) On or about September 23, 2011, **ERNESTO MANUEL GONZALEZ**, a/k/a "Romeo," Sergeant-at-Arms of the Vagos San Jose chapter, volunteered to execute the "green light" order to kill rival "Hells Angels" gang member J.P.

40) On or about September 23, 2011, **ERNESTO MANUEL GONZALEZ**, a/k/a "Romeo," using a firearm, shot rival "Hells Angels" gang member J.P. to death, at the Nugget Hotel and Casino in Sparks, Nevada.

41) In or about September 2011, **PASTOR FAUSTO PALAFOX**, a/k/a "Tata," ordered a subordinate gang member who participated in the murder of rival "Hells Angels" member J.P., to clear his house of any evidence that could link him to the Vagos OMG enterprise.

1 42) In or about October 2011, armed with a firearm, **ALBERT BENJAMIN**
2 **PEREZ**, a/k/a "Dragon Man," and **ALBERT LOPEZ**, a/k/a "Al," and other unindicted Vagos members,
3 attempted to steal a motorcycle from a subordinate gang member who was considered "out bad" by the
4 gang.

5 43) In or about December 2011, **ALBERT LOPEZ**, a/k/a "Al," ordered a
6 Vagos Los Angeles chapter member to "beat down" a fellow member whom the Vagos believed had
7 cooperated with law enforcement in the murder investigation of rival "Hells Angels" member J.P.

8 44) In or about December 2011, **PAUL JEFFERY VOLL**, a/k/a "Shyster," told
9 a fellow Vagos gang member that he could pay local "Crip" gang members \$500.00 to kill a fellow Vagos
10 gang member whom the Vagos believed had cooperated with law enforcement.

11 45) On or about December 17, 2011, **ROBERT ALAN COLEMAN**, a/k/a
12 "Mayhem," admitted to an undercover law enforcement officer, who was then posing as a potential Vagos
13 member, that notwithstanding his status as a convicted felon he was willing to carry a firearm and "kill
14 for the Vagos and do the time."

15 46) On or about February 25, 2012, at a Vagos "Sergeant-at-Arms" meeting
16 **ALBERT BENJAMIN PEREZ**, a/k/a "Dragon Man," expressed displeasure and stated "Aren't we an
17 outlaw club," upon learning of a subordinate member's removal from the gang because he engaged in an
18 act of witness intimidation with members of the "Mexican Mafia."

19 47) On or about July 5, 2012, **JEREMY JOHN HALGAT**, a/k/a "Maniak," and
20 other unindicted Vagos members sold an AK-type semi-automatic assault weapon to an undercover law
21 enforcement officer, who was then posing as a full patched Vagos member.

1 48) On or about July 14, 2012, **STEVEN EARL CARR**, a/k/a "Big Steve,"
2 admitted to an undercover law enforcement officer then posing as a full patched Vagos member that he
3 followed a member expelled (ex'd) from the Vagos gang to his court appearance where he was expected
4 to testify about being attacked and severely beaten by **CARR** and other Vagos gang members.

5 49) On or about July 14, 2012, **STEVEN EARL CARR**, a/k/a "Big Steve,"
6 told an undercover law enforcement officer then posing as a full patched Vagos member that "I did smash
7 his orbit," and conceded he was "heading to prison" for his role in an attack against a fellow Vagos gang
8 member.

9 50) On or about July 18, 2012, at a "Southern Nevada Regional Presidents"
10 meeting, **STEVEN EARL CARR**, a/k/a "Big Steve," stated "all we need is for these mother f*ckers not
11 to show up to court and testify," upon referencing the testimony of an ex'd Vagos gang member who was
12 beaten by fellow chapter members and subsequently cooperated with law enforcement.

13 51) On or about July 18, 2012, **JEREMY JOHN HALGAT**, a/k/a "Maniak,"
14 told an undercover law enforcement officer, who was then posing as a full patched Vagos member, that
15 **HALGAT** planned to attack a fellow Vagos gang member whom the Vagos believed had cooperated
16 with law enforcement.

17 52) On or about July 20, 2012, at a Vagos "Sergeant-at-Arms" meeting at the
18 San Fernando Valley Chapter Club House, **ALBERT BENJAMIN PEREZ**, a/k/a "Dragon Man," said
19 that "I pray every day I make a f*cking decision, it's not the wrong decision, because it may leave a lot
20 of people without families and kids without fathers. It's a f*cked situation. No one asked us to prospect,
21 we asked to prospect. This isn't for everyone. If you have people in your chapter who are weak links,
22 build them up, or boot them the f*ck out. We don't need no more lames."

1 53) On or about July 20, 2012, at a San Fernando Valley chapter "Sergeant-
2 at-Arms" meeting, **ALBERT LOPEZ**, a/k/a "Al," ordered a "hit" against a former Vagos gang member
3 who had joined the rival "Mongols."

4 54) On or about August 4, 2012, **JAMES PATRICK GILLESPIE**, a/k/a "Jimbo,"
5 presided over a Vagos "Chapter Presidents and Regional Representatives" meeting in Ogden, Utah, and
6 ordered every member to pay a \$100.00 tax to be used to pay for the lawyers of the Vagos member
7 charged in connection with the 2011 Nugget Casino homicide.

8 55) On or about August 4, 2012, **JAMES PATRICK GILLESPIE**, a/k/a "Jimbo"
9 ordered subordinate gang members to ride in a pack of motorcycles wearing Vagos riding vests to the
10 home and past local establishments frequented by a former Vagos gang member who was considered
11 "out bad" by the gang. **GILLESPIE** also told a subordinate gang member "make no mistake about it, I
12 run this club. Get them f*cking patches back," upon ordering a "hit" against a former Vagos gang
13 member.

14 56) On or about August 30, 2012, at a Vagos "Southern Nevada Presidents"
15 meeting, **STEVEN EARL CARR**, a/k/a "Big Steve," ordered members to take the "cuts" from rival
16 "POBOBs" on sight, if they displayed a "Nevada" bottom rocker. **CARR** also ordered members to force
17 a "Green Machine" support club prospect to recant statements he made to law enforcement and remove
18 him "out bad" from the gang.

19 57) On or about September 8, 2012, at a "Southern California Sergeant-at-Arms"
20 meeting, **ALBERT BENJAMIN PEREZ**, a/k/a "Dragon Man," advised members that "shit is on the
21 horizon so suit up," upon discussing problems with rival gangs, and demanded money from every gang
22 member to be used to pay for the lawyers of the Vagos member charged in connection with the 2011
23 Nugget Casino homicide.

1 58) On or about September 8, 2012, **ALBERT BENJAMIN PEREZ**, a/k/a

2 "Dragon Man," told an undercover law enforcement officer then posing as a full patched Vagos member
3 that in the past he sold five kilograms of cocaine a week and commit home invasions of drug houses.

4 59) On or about September 11, 2012, **JEREMY JOHN HALGAT**, a/k/a

5 "Maniak," agreed to broker the sale and distribution of approximately 113.3 grams of cocaine and sell a
6 firearm to an undercover law enforcement officer, who was then posing as a full patched Vagos member.

7 60) On or about September 19, 2012, **JEREMY JOHN HALGAT**, a/k/a

8 "Maniak," and other unindicted members, sold and distributed approximately 28.3 grams of cocaine to
9 an undercover law enforcement officer, who was then posing as a full patched Vagos member.

10 61) On or about October 11, 2012, at a Vagos "Regional Sergeant-at-

11 Arms" meeting in Las Vegas, **JEREMY JOHN HALGAT**, a/k/a "Maniak," announced that if the rival
12 "Hells Angels" "touches" a "Green Nation" member, "he will go after every Hells Angels or Hells Angels
13 support club."

14 62) On or about October 11, 2012, **JEREMY JOHN HALGAT**, a/k/a "Maniak,"

15 and other unindicted members, sold and distributed approximately 28.3 grams of cocaine to an
16 undercover law enforcement officer, who was then posing as a full patched Vagos member.

17 63) On or about October 11, 2012, at a Vagos "Sergeant-at-Arms" meeting in

18 Las Vegas, **JEREMY JOHN HALGAT**, a/k/a "Maniak," announced that the Vagos was at war with the
19 rival "POBOBs." **HALGAT** announced "that their (POBOBs) bottom rocker is coming off one way or
20 another. They can take it off, or I'll take it off for them; no more warnings." **HALGAT** told his fellow
21 gang members "Every once in a while you need to smash a mother f*cker to let him know who's on top
22 of the food chain."

1 64) On or about October 12, 2012, **JEREMY JOHN HALGAT**, a/k/a "Maniak,"
2 and other unindicted members, sold and distributed approximately 28.3 grams of cocaine to an
3 undercover law enforcement officer, who was then posing as a full patched Vagos member.

4 65) On or about October 26, 2012, **JEREMY JOHN HALGAT**, a/k/a "Maniak,"
5 and other unindicted members, sold and distributed approximately 28.3 grams of cocaine to an
6 undercover law enforcement officer, who was then posing as a full patched Vagos member.

7 66) On or about October 28, 2012, **DARIN KIETH GRIEDER**, a/k/a "Midget,"
8 **MATHEW KEITH DUNLAP**, a/k/a "Big Mat," and **JOHNNY RUSSELL NEDDENRIEP**, a/k/a
9 "Johnny Bolts," and other unindicted Vagos members, traveled in a pack of motorcycles wearing Vagos
10 riding vests to confront the rival "POBOBs" and "Saxons" at a Minden/Gardnerville, Nevada "toy run."

11 67) On or about December 1, 2012, **ROBERT ALAN COLEMAN**, a/k/a
12 "Mayhem," and **JEREMY JOHN HALGAT**, a/k/a "Maniak," and other unindicted members, travelled
13 in a pack of motorcycles wearing Vagos riding vests to a Las Vegas bar "hunting" for members of the
14 rival "POBOBs."

15 68) In or about January 2013, **PAUL JEFFERY VOLL**, a/k/a "Shyster," told a
16 former gang member "You know there was an order (to kill rival "Hells Angels" member J.P.), but you
17 will testify that there was no order," upon ordering the former Vagos member to travel to Reno, Nevada,
18 and testify falsely on behalf of a Vagos member on trial for the murder of "Hells Angels" member J.P.

19 69) On or about January 25, 2013, **VICTOR ADAM RAMIREZ**, a/k/a "Slick,"
20 and **Edward Chelby** a/k/a "Recon," and other unindicted Vagos members, trapped a patron inside the
21 men's bathroom of Count's Vamp'd Rock Bar & Grill in Las Vegas as punishment for what they
22 perceived as disrespect of the Vagos gang.

1 70) On or about January 25, 2013, **VICTOR ADAM RAMIREZ**, a/k/a "Slick,"
2 and **Edward Chelby**, a/k/a "Recon," and other unindicted Vagos members, beat and severely injured a
3 patron inside the men's bathroom of Count's Vamp'd Rock Bar & Grill in Las Vegas, as punishment for
4 what they perceived as disrespect of the Vagos gang.

5 71) On or about January 25, 2013, **JAMES WALTER HENDERSON**, a/k/a
6 "CJ," drove **VICTOR ADAM RAMIREZ**, a/k/a "Slick," **Edward Chelby**, a/k/a "Recon," and other
7 unidentified Vagos members, away from Count's Vamp'd Rock Bar & Grill in Las Vegas, in order to
8 prevent **RAMIREZ** and **Chelby** from being identified and apprehended by law enforcement after
9 **RAMIREZ** and **Chelby**, and other unidentified Vagos members, attacked a patron in the bar's bathroom.

10 72) On or about January 26, 2013, at a Vagos "National Officers" meeting in
11 Jean, Nevada, **PASTOR FAUSTO PALAFOX**, a/k/a "TaTa," announced that the "Green Machine"
12 outlaw motorcycle support club was now under **PALAFOX's** and Vagos' control. **PALAFOX** also
13 ordered members of the Las Vegas chapter to attack rival "POBOBs" found in Nevada "flying" a
14 "Nevada" state bottom rocker on their motorcycle gang "cuts."

15 73) On or about January 27, 2013, **ALBERT LOPEZ**, a/k/a "Al," attacked an
16 unidentified individual because he asked **LOPEZ** whether he was a "Mongols" gang member.

17 74) On or about February 8, 2013, at a Vagos "Southern Nevada Presidents"
18 meeting, **STEVEN EARL CARR**, a/k/a "Big Steve," ordered Vagos members to move against the rival
19 "Bandidos" in New Mexico and "smash them before they do." **CARR** also told members that the Vagos
20 "needed to pick-off three or four POBOBs and the rest would walk away," upon ordering members to
21 attack the rival "POBOBs."

22 75) On or about February 21, 2013, **ROBERT ALAN COLEMAN**, a/k/a "Mayhem,"
23 **JAMES WALTER HENDERSON**, a/k/a "CJ," and **STEVEN EARL CARR**, a/k/a "Big Steve," and
24

1 other unindicted Vagos members riding in a pack of motorcycles and wearing Vagos riding vests, traveled
2 to a Las Vegas bar in order to provoke a confrontation with the rival "POBOBs."

3 76) On or about March 8, 2013, at a North Hollywood Vagos private
4 "Sergeant-at-Arms" meeting, **ALBERT LOPEZ**, a/k/a "Al," ordered an undercover law enforcement
5 officer, who was then posing as a full patched Vagos sergeant-at-arms member, to take six Las Vegas
6 chapter members who owned concealed weapons permits, join-up with California-based members in
7 Phoenix, and ride in a pack of motorcycles wearing Vagos riding vests as a "show of force" against the
8 rival "Bandidos."

9 77) On or about March 13, 2013, **JAMES WALTER HENDERSON**, a/k/a "CJ,"
10 presided over a Vagos "Southern Nevada Sergeant-at-Arms" meeting and told members "This is where
11 bathrooms come in nice," upon instructing Vagos members of the best location to avoid cameras and
12 attack rival "POBOBs." **HENDERSON** also ordered members to ride in a pack of motorcycles wearing
13 Vagos riding vests past the residence of every rival "POBOBs" member's house as a show of force and
14 act of intimidation.

15 78) On or about April 13, 2013, at the Leatherneck Club in Las Vegas, **ROBERT**
16 **ALAN COLEMAN**, a/k/a "Mayhem," and **STEVEN EARL CARR**, a/k/a "Big Steve," and other
17 unindicted Vagos members, threatened to attack three members of the rival "You Guys" if they didn't
18 remove their "cuts" and leave the Club.

19 79) On or about April 27, 2013, at the Clarion Hotel in Sacramento, California,
20 **ALBERT BENJAMIN PEREZ**, a/k/a "Dragon Man," told members of the Las Vegas Vagos chapter,
21 including an undercover law enforcement officer then posing as a full patched Vagos member, "I know
22 you have "Bandidos" in Las Vegas, it's on with them."

1 80) On or about April 27, 2013, **ALBERT LOPEZ**, a/k/a "Al," handed a piece of
2 paper to the president of the Las Vegas Vagos chapter and an undercover law enforcement officer then
3 posing as a full patched Vagos member. On the paper was a hand written note stating that it was "on
4 with the 'Bandidos,'" and to "turn their sh*t (cuts) in to National."

5 81) On or about April 30, 2013, at a "Southern Nevada President and Sergeant-
6 at-Arms" meeting, **JAMES WALTER HENDERSON**, a/k/a "CJ," told members "we can handle the
7 "Bandidos" here in Las Vegas, no problem." **HENDERSON** also ordered fellow gang members to
8 gather intelligence, home addresses, and hangout locations of rival "Bandidos" gang members.

9 82) On or about May 4, 2013, **VICTOR ADAM RAMIREZ**, a/k/a "Slick," and an
10 undercover law enforcement officer then posing as a full patched Vagos member, discussed the beating
11 that occurred at Count's Vamp'd Rock Bar and Grill in Las Vegas. **RAMIREZ** admitted that he and
12 **Chelby** beat a bar patron. **RAMIREZ** said that he and **Chelby** "fucked him-up in the bathroom pretty
13 good," that "it could have been worse," and that they were "doing what they had to do (because) I'm the
14 'P.'"

15 83) On or about May 7, 2013, **JAMES WALTER HENDERSON**, a/k/a "CJ,"
16 presided over a Las Vegas area Vagos "Sergeant-at-Arms" meeting and ordered members to attack the
17 rival "Bandidos." **HENDERSON** told members "Vagos need to take off their top guy. Make sure you
18 have plenty of bullets and our families have a safe place to go."

19 84) On or about May 16, 2013, at a "Confederation of Clubs" meeting, **JAMES**
20 **WALTER HENDERSON**, a/k/a "CJ," told fellow Vagos members that he had issued an ultimatum to
21 the rival "Bandidos" to leave Las Vegas within 24 hours or they were "done."

22 85) In or about July 2013, **PASTOR FAUSTO PALAFOX**, a/k/a "TaTa," and
23 **ALBERT PEREZ**, a/k/a "Dragon Man," ordered a former gang member to travel to Reno and testify
24

1 falsely on behalf of a fellow Vagos member on trial for the 2011 Nugget Casino homicide. **PALAFOX**
2 said "go up there and do what you need to do and you can rejoin any chapter you choose."

3 86) In or about July 2013, **ALBERT LOPEZ** a/k/a "Al," sanctioned a \$100,000
4 reward for a "hit" against a law enforcement officer who posed as a full patched Vagos member and
5 successfully infiltrated the Vagos OMG enterprise.

6 87) In or about July 2013, **ALBERT LOPEZ**, a/k/a "Al," sanctioned a \$100,000
7 reward for a "hit" against a Vagos member whom the Vagos believed had cooperated with law
8 enforcement.

9 88) On or about July 18, 2013, **PAUL JEFFERY VOLL**, a/k/a "Shyster," in an act
10 of intimidation, sent two private investigators to the home of the wife of a Vagos gang member whom
11 the Vagos believed had cooperated with law enforcement.

12 89) In or about September 2013, **ALBERT BENJAMIN PEREZ**, a/k/a
13 "Dragon Man," told a law enforcement officer that the conflict between the Vagos and rival "Bandidos"
14 was expected to continue.

15 90) On or about October 29, 2014, **ALBERT BENJAMIN PEREZ**, a/k/a
16 "Dragon Man," possessed several plastic bags of methamphetamine, heroin, a digital scale, a payment
17 ledger, and 21 fraudulent credit cards that were seized by law enforcement.

18 91) On or about November 22, 2014, **JOHNNY RUSSELL NEDDENRIEP**,
19 a/k/a "Johnny Bolts," demanded \$3,000.00 from a gang member who wanted out of the gang and warned
20 him "if you miss the first payment it will be a trip to the hospital."

21 92) On or about January 10, 2015, **ANDREW ELOY LOZANO**, a/k/a "Hulk,"
22 admitted to a law enforcement officer during a traffic stop that he was an active member of the Vagos
23 Desert Empire chapter and had served in good standing for the past 16-years.
24

1 93) On or about January 10, 2015, **ALBERT LOPEZ**, a/k/a "Al," was elected as
2 the International President of the Vagos OMG Enterprise.

3 94) On or about June 3, 2015, **ALBERT BENJAMIN PEREZ**, a/k/a "Dragon
4 Man," told a federal law enforcement officer that he (**PEREZ**) " would end up "full of holes" if the
5 Vagos thought he was a "snitch," upon admitting that he was present at the Nugget Casino during the
6 2011 murder of a rival "Hells Angels." **PEREZ** also said that "we give what we get," and if someone
7 stomps his foot he would "smash their face in," upon admitting dislike for the rival "Hells Angels."

8 95) On or about June 12, 2015, **VICTOR ADAM RAMIREZ**, a/k/a "Slick,"
9 smashed a beer bottle over the head and severely injured an individual whom the Vagos believed was a
10 member of the rival "Mongols" gang.

11 96) On or about May 28, 2016, **JOHN JOSEPH SIEMER**, a/k/a "Rocky,"
12 participated in the Vagos mandatory 50th anniversary motorcycle "run" at Mentone, California.
13 **SIEMER** was wearing his Vagos riding clothing as a member of the Nomad's chapter.

14 97) On or about December 7, 2016, **PAUL JEFFERY VOLL**, a/k/a
15 "Shyster," sold an AR-15 type assault rifle to a former Vagos member and told him he had other weapons
16 for sale that "had bodies on them."

17 98) On or about December 7, 2016, **PAUL JEFFERY VOLL**, a/k/a "Shyster,"
18 told a former Vagos member that "it is on with the Featherheads," and said any Vagos who encountered
19 a member of the rival "Hells Angels" was expected to "shoot on sight."

20 99) On or about March 17, 2016, **JOHN CHRISPIN JUAREZ**, a/k/a "Quicky," and
21 other unindicted Vagos members, riding in a pack of motorcycles and wearing Vagos riding vests,
22 traveled to a Colton, California restaurant to provoke a confrontation with the rival "Hells Angels," and
23 a "Hells Angels" support gang.
24

100) In or about January 2017, **ALBERT LOPEZ**, a/k/a "Al," agreed to supply a fellow gang member with copies of a flier announcing a \$100,000 reward for a "hit" against a law enforcement officer who posed as a full patched Vagos member and successfully infiltrated the Vagos OMG and the former president of the Las Vegas chapter whom the Vagos believed had cooperated with law enforcement.

101) On or about March 25, 2017, **ANDREW ELOY LOZANO**, a/k/a "Hulk," attended a mandatory Vagos "run" in Palm Springs, California, wearing his Vagos riding vest as a member of the Vagos Desert Empire chapter.

102) On or about April 3, 2017, **PAUL JEFFERY VOLL**, a/k/a "Shyster," sent a text message to a former Vagos member stating that "The f*ck that did it is gonna hurt," in reference to a fellow Vagos member who killed two fellow chapter members at a San Bernardino, California bar.

103) On or about, April 15, 2017, **JOHN CHRISPIN JUAREZ**, a/k/a "Quicky," attended a Vagos mandatory "run" in Stanton, California, wearing his Vagos riding vest as a member of the Vagos Berdoo chapter.

NOTICE OF SPECIAL SENTENCING FACTORS

9. As part of their agreement to conduct and participate in the conduct of the affairs of the enterprise through a pattern of racketeering activity, the defendants

PASTOR PALAFOX, a/k/a "TaTa,"
ALBERT LOPEZ, a/k/a "Al,"
ALBERT BENJAMIN PEREZ, a/k/a "Dragon Man,"
JAMES PATRICK GILLESPIE, a/k/a "Jimbo,"
ANDREW ELOY LOZANO, a/k/a "Hulk,"
ERNESTO MANUEL GONZALEZ, a/k/a "Romeo,"
VICTOR ADAM RAMIREZ, a/k/a "Slick,"
JAMES WALTER HENDERSON, a/k/a "CJ,"
STEVEN EARL CARR, a/k/a "Big Steve,"
ROBERT ALAN COLEMAN, a/k/a "Mayhem,"
JEREMY JOHN HALGAT, a/k/a "Maniak,"
PAUL JEFFREY VOLL, a/k/a "Shyster,"

JOHN JOSEPH SIEMER, a/k/a "Rocky,"
JOHNNY RUSSELL NEDDENRIEP, a/k/a "Johnny Bolts,"
DARIN KIETH GRIEDER, a/k/a "Midget,"
MATHEW KEITH DUNLAP, a/k/a "Big Mat," and
JOHN CHRISPIN JUAREZ, a/k/a "Quicky,"

agreed that multiple acts involving murder would be committed, in violation of Nevada Revised Statutes Section 200.010 and 200.30 and California Penal Code Sections 187 and 189, to wit, the willful, deliberate, premeditated, and unlawful killing of a human being, with malice aforethought.

10. On or about January 25, 2013, in the State and District of Nevada, **VICTOR ADAM RAMIREZ, a/k/a "Slick,"** defendant herein, and others known and unknown to the grand jury, while aiding and abetting each other, did willfully seize, confine, inveigle, entice, decoy, abduct, conceal, kidnap, and carry away with the intent to hold and detain, and did hold and detain, D.D. for the purpose of inflicting substantial bodily harm upon D.D., in violation of Nevada Revised Statutes, Sections 200.310.

11. On or about September 15, 2011, in the State and District of Nevada, **JOHNNY RUSSELL NEDDENRIEP, a/k/a "Johnny Bolts," DARIN KIETH GRIEDER, a/k/a "Midget," and MATHEW KEITH DUNLAP, a/k/a "Big Mat,"** defendants herein, and others known and unknown to the grand jury, while aiding and abetting each other, did willfully seize, confine, inveigle, entice, decoy, abduct, conceal, kidnap, and carry away with the intent to hold and detain, and did hold and detain, M.H. for the purpose of committing robbery and inflicting substantial bodily harm upon M.H. in violation of Nevada Revised Statutes, Sections 200.310.

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

COUNT TWO
Murder of J.P.

12. At all times relevant to this superseding indictment, the Vagos OMG, including its leaders, members, and associates, as more fully described in Paragraphs One through Six of this superseding indictment, which are re-alleged and incorporated by reference as though fully set forth herein, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact, which was engaged in and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members and associates, including its prospects, functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

13. The above-described Vagos enterprise, through its members and associates, engaged in racketeering activity as defined in Sections 1959(b)(1) and 1961(1), of Title 18, United States Code, that is, multiple acts involving murder, robbery, extortion, and kidnapping, in violation of Nevada Revised Statutes, California Penal Code, Arizona Revised Statute, and New Mexico Statutes; multiple acts indictable under Title 18, United States Code, Sections 1512 (tampering with a witness, victim, or an informant), 1513 (retaliating against a witness, victim, or informant) 2312 (transportation of stolen vehicles) and 2313 (sale or receipt of stolen vehicles); and multiple offenses involving narcotics trafficking, in violation of Sections 841(a)(1) (distribution and possession with the intent to distribute a controlled substance) and 846 (conspiracy to distribute and possess with the intent to distribute a controlled substance), of Title 21, United States Code.

14. On or about September 23, 2011, in the State and District of Nevada, for the purpose of gaining entrance to and maintaining and increasing position in the Vagos OMG, an enterprise engaged in racketeering activity,

PASTOR FAUSTO PALAFOX, a/k/a "TaTa,"
ALBERT LOPEZ, a/k/a "Al,"
ALBERT BENJAMIN PEREZ, a/k/a "Dragon Man,"
JAMES PATRICK GILLESPIE, a/k/a "Jimbo,"
ERNESTO MANUEL GONZALEZ, a/k/a "Romeo,"
BRADLEY MICHAEL CAMPOS, a/k/a "Candy Man,"
CESAR VAQUERA MORALES, a/k/a "C," and
DIEGO CHAVEZ GARCIA, a/k/a "Boo,"

defendants herein, along with others known and unknown to the grand jury, while aiding and abetting
 each other, did knowingly and intentionally murder J.P., in violation of Nevada Revised Statutes,
 Sections 200.010, 200.030, and 195.020. All in violation of 18 U.S.C. §§ 1959(a)(1) and 2.

COUNT THREE

Using and Carrying a Firearm to Commit Murder During and in Retaliation to a Crime of Violence; Aiding and Abetting

15. On or about September 23, 2011, in the State and District of Nevada,

PASTOR FAUSTO PALAFOX, a/k/a "TaTa,"
ALBERT LOPEZ, a/k/a "Al,"
ALBERT BENJAMIN PEREZ, a/k/a "Dragon Man,"
JAMES PATRICK GILLESPIE, a/k/a "Jimbo,"
ERNESTO MANUEL GONZALEZ, a/k/a "Romeo,"
BRADLEY MICHAEL CAMPOS, a/k/a "Candy Man,"
CESAR VAQUERA MORALES, a/k/a "C," and
DIEGO CHAVEZ GARCIA, a/k/a "Boo,"

defendants herein, along with others known and unknown to the grand jury, while aiding and abetting
 each other, did knowingly and intentionally use and carry a firearm during and in relation to a crime of
 violence for which the defendants may be prosecuted in a court of the United States, as alleged in Count
 TWO of this superseding indictment, which is incorporated by reference here, and did in the course of
 such offense cause the death of a person through the use of a firearm, which killing is a murder as defined
 in Title 18, United States Code, Section 1111, in that the defendants did knowingly kill J.P. by shooting

1 him with a firearm during the perpetration of a crime of violence. All in violation of Title 18, United
2 States Code, Sections 924(j)(1) and 2.

3
4 **COUNT FOUR**
Kidnapping of D.D.

5 16. Paragraphs eight and nine of this superseding indictment are re-alleged and
6 incorporated by reference as though fully set forth herein.

7 17. On or about January 25, 2013, in the State and District of Nevada, for the purpose
8 of gaining entrance to and maintaining and increasing position in the Vagos OMG, an enterprise engaged
9 in racketeering activity,

10 **VICTOR ADAM RAMIREZ, a/k/a "Slick," and**
11 **EDWARD CLARIDAN CHELBY, a/k/a "Recon,"**

12 defendants herein, and others known and unknown to the grand jury, while aiding and abetting each
13 other, kidnapped D.D., in violation of Nevada Revised Statutes, Sections 200.320 and 195.020. All in
14 violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

15 **COUNT FIVE**
16 ***Assault of D.D.***

17 18. Paragraphs EIGHT and NINE of this superseding indictment are re-alleged and
18 incorporated by reference as though fully set forth herein.

19 19. On or about January 25, 2013, in the State and District of Nevada, for the
20 purpose of gaining entrance to and maintaining and increasing position in the Vagos OMG, an enterprise
21 engaged in racketeering activity,

22 **VICTOR ADAM RAMIREZ, a/k/a "Slick," and**
23 **EDWARD CLARIDAN CHELBY, a/k/a "Recon,"**
24

1 defendants herein, and others known and unknown to the grand jury, while aiding and abetting each
 2 other, did assault D.D., resulting in serious bodily injury, in violation of Nevada Revised Statutes,
 3 Sections 200.481 and 195.020. All in violation of Title 18, United States Code, Sections 1959(a)(3)
 4 and 2.

5
 6 **COUNT SIX**
Kidnapping of M.H.

7 20. Paragraphs EIGHT and NINE of this superseding indictment are re-alleged and
 8 incorporated by reference as though fully set forth herein.

9 21. On or about September 15, 2011, in the State and District of Nevada, for the purpose
 10 of gaining entrance to and maintaining and increasing position in the Vagos OMG, an enterprise engaged
 11 in racketeering activity,

12 **JOHNNY RUSSELL NEDDENRIEP, a/k/a "Johnny Bolts,"**
 13 **DARIN KIETH GRIEDER, a/k/a "Midget,"**
 14 **THOMAS GRANVILLE GARRETSON, a/k/a "Tommy Guns,"**
BERT WAYNE DAVISSON, a/k/a "Flash," and
MATHEW KEITH DUNLAP, a/k/a "Big Mat,"

15 defendants herein, and others known and unknown to the grand jury, while aiding and abetting each
 16 other, kidnapped M.H., in violation of Nevada Revised Statutes, Sections 200.320 and 195.020. All in
 17 violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

18 **COUNT SEVEN**
 19 ***Using and Carrying a Firearm During and in Relation to a Crime of Violence***
Aiding and Abetting

20 22. On or about September 15, 2011, in the State and District of Nevada,

21 **JOHNNY RUSSELL NEDDENRIEP, a/k/a "Johnny Bolts,"**
 22 **DARIN KIETH GRIEDER, a/k/a "Midget,"**
 23 **THOMAS GRANVILLE GARRETSON, a/k/a "Tommy Guns,"**
 24 **BERT WAYNE DAVISSON, a/k/a "Flash," and**
MATHEW KEITH DUNLAP, a/k/a "Big Mat,"

defendants herein, along with others known and unknown to the grand jury, while aiding and abetting each other, did knowingly and intentionally use and carry a firearm during and in relation to a crime of violence for which the Defendants may be prosecuted in a court of the United States, as alleged in Count SIX of this superseding indictment, which is incorporated by reference here, and did in the course of such offense brandish a firearm. All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT EIGHT

Assault of M.H.

23. Paragraphs EIGHT and NINE of this superseding indictment are re-alleged and incorporated by reference as though fully set forth herein.

24. On or about September 15, 2011, in the State and District of Nevada, for the purpose of gaining entrance to and maintaining and increasing position in the Vagos OMG, an enterprise engaged in racketeering activity,

JOHNNY RUSSELL NEDDENRIEP, a/k/a "Johnny Bolts,"
DARIN KIETH GRIEDER, a/k/a "Midget,"
THOMAS GRANVILLE GARRETSON, a/k/a "Tommy Guns,"
BERT WAYNE DAVISSON, a/k/a "Flash," and
MATHEW KEITH DUNLAP, a/k/a "Big Mat,"

defendants herein, and others known and unknown to the grand jury, while aiding and abetting each other, did assault M.H., resulting in serious bodily injury, in violation of Nevada Revised Statutes, Sections 200.481 and 195.020. All in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT NINE

Using and Carrying a Firearm During and in Relation to a Crime of Violence Aiding and Abetting

25. On or about September 15, 2011, in the State and District of Nevada,

JOHNNY RUSSELL NEDDENRIEP, a/k/a "Johnny Bolts,"
DARIN KIETH GRIEDER, a/k/a "Midget,"
THOMAS GRANVILLE GARRETSON, a/k/a "Tommy Guns,"
BERT WAYNE DAVISSON, a/k/a "Flash," and
MATHEW KEITH DUNLAP,

defendants herein, along with others known and unknown to the grand jury, while aiding and abetting each other, did knowingly and intentionally use and carry a firearm during and in relation to a crime of violence for which the Defendants may be prosecuted in a court of the United States, as alleged in Count EIGHT of this superseding indictment, which is incorporated by reference here, and did in the course of such offense brandish a firearm. All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT TEN

Taking of Motor Vehicle

26. On or about September 15, 2011, in the State and District of Nevada,

JOHNNY RUSSELL NEDDENRIEP, a/k/a "Johnny Bolts,"
DARIN KIETH GRIEDER, a/k/a "Midget,"
THOMAS GRANVILLE GARRETSON, a/k/a "Tommy Guns,"
BERT WAYNE DAVISSON, a/k/a "Flash," and
MATHEW KEITH DUNLAP, a/k/a "Big Mat,"

defendants herein, and others known and unknown to the grand jury, while aiding and abetting each other, with the intent to cause serious bodily harm, by force, violence, and intimidation did knowingly and unlawfully take from the person and presence of M. H. a motor vehicle, namely, a Harley Davidson motorcycle, which had been shipped and transported in interstate commerce, and said offense resulted in serious bodily injury to M. H. All in violation of Title 18, United States Code, Sections 2119(2) and 2.

COUNT ELEVEN

Conspiracy to Possess with Intent to Deliver a Controlled Substance

27. Beginning on or about February 22, 2013, and continuing to on or about March 2, 2013, in the State and Federal District of Nevada,

JEREMY HALGAT, a/k/a "Maniak"

the defendant herein, knowingly and intentionally combined, conspired, and agreed with other persons known and unknown to the Grand Jury, to commit the following offense against the United States: Possession with Intent to Distribute at Least Five (5) kilograms of a mixture and substance containing cocaine to wit: approximately ten (10) kilograms of a mixture and substance containing cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

Overt Acts in Furtherance of the Conspiracy

28. In furtherance of the conspiracy and to effect and accomplish its objects, one or more of the defendant or conspirators, both indicted and unindicted, committed the following overt acts, among others, in the District of Nevada and elsewhere:

1) Defendant HALGAT, then members of the Vagos Motorcycle gang, met with an undercover task force officer (TFO) from the Bureau of Alcohol Tobacco and Firearms and Explosives (ATF) on February 22, 2013.

2) At the February 22, 2013 meeting, the defendant agreed to provide protection and security for the TFO during a controlled purchase of cocaine. The TFO explained to the defendant that he was a cocaine courier for a Mexican cartel and that he transports 10-20 kilograms of cocaine to Georgia every month. The defendant agreed to provide security for the drug deal and agreed to carry firearms.

3) On March 2, 2013, the defendant, met the undercover TFO at the TFO's undercover residence. Defendant HALGAT arrived at the residence with an AK-47 rifle and a pistol grip shotgun. Defendant HALGAT stated that he brought 160 rounds of ammunition for the "AK" and a box of shells for the "shotgun."


1 defendant herein, during and in relation to the drug trafficking crime charged in Count ELEVEN of this
2 superseding indictment, knowingly and intentionally used and carried a firearm, in violation of Title 18,
3 United States Code, Sections 924(c)(1)(A)(i).

4
5 **DATED:** this 14 day of June, 2017.

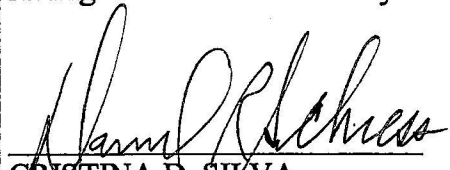
6 **A TRUE BILL:**

7
8 /S/
FOREPERSON OF THE GRAND JURY

9 DAVID L. JAFFE
Acting Chief, Organized Crime and Gang Section
10 United States Department of Justice

11
12 
13 DAVID N. KARPEL
Trial Attorney
14 Organized Crime and Gang Section
United States Department of Justice

15
16
17 STEVEN W. MYHRE
18 Acting United States Attorney

19
20 
21 CRISTINA D. SILVA
Assistant United States Attorney