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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

Phil Lombardi, Clerk
U.S. DISTRICT COURT

UNITED STATES OF AMERICA,

Case No. **14 CR 170 CVE**

Plaintiff,

FILED UNDER SEAL

v.

INDICTMENT

ANTHONY RAMON HALL,

a/k/a "Tony",

RONNIE DEAN HASKINS,

a/k/a "Dirty Red",

AARON CLAY KING,

WILLIAM BENTON WILLIAMS,

a/k/a "Will",

MATTHEW BRIAN WAGNER,

a/k/a "Red",

RICHARD ALLEN ROBERTS,

a/k/a "Ricky",

ROBERT ALLEN PAUL BRYAN,

RODNEY LEE BROOMHALL,

a/k/a "Buddha",

KRISTIN MICHELLE BRIGHT,

CARL MATTHEW SMITH,

TIMOTHY DUANE BUCK,

Defendants.

) **[COUNT 1: 18 U.S.C. § 1962(d) –**
) **Conspiracy to Participate in a**
) **Racketeering Enterprise;**
) **COUNT 2: 21 U.S.C. § 846 –**
) **Conspiracy to Possess With Intent to**
) **Distribute and to Distribute**
) **Methamphetamine;**
) **COUNT 3: 18 U.S.C. § 1959(a)(1) –**
) **Kidnapping;**
) **COUNT 4: 18 U.S.C. § 1959(a)(2) -**
) **Maiming]**

THE GRAND JURY CHARGES:

COUNT ONE

[18 U.S.C. § 1962(d)]

INTRODUCTION

1. At various times relevant to this Indictment, the defendants, **ANTHONY RAMON HALL, a/k/a "Tony", RONNIE DEAN HASKINS, a/k/a "Dirty Red", AARON CLAY KING, WILLIAM BENTON WILLIAMS, a/k/a "Will", MATTHEW BRIAN WAGNER, a/k/a "Red", RICHARD ALLEN ROBERTS, a/k/a**

“Ricky”, KRISTIN MICHELLE BRIGHT, CARL MATTHEW SMITH, TIMOTHY DUANE BUCK, and others known and unknown to the Grand Jury, were members of the Universal Aryan Brotherhood (hereinafter "UAB"), a criminal organization whose members and associates engaged in drug distribution, and acts of violence involving kidnapping, assault, money laundering, and arson, and which operated throughout the State of Oklahoma, including the Northern, Eastern and Western Districts of Oklahoma, and elsewhere.

STRUCTURE AND OPERATION OF THE ENTERPRISE

2. The structure of the UAB included, but was not limited to, the following:
 - a. The UAB was a violent "whites only" prison-based gang with hundreds of members operating inside and outside of the state penal institutions throughout Oklahoma. The UAB offered protection to white inmates if they joined the gang.
 - b. The traditional power centers of the UAB, and members of the gang's leadership structure, were predominately located in prisons operated by the Oklahoma Department of Corrections (ODOC), the Correctional Corporation of America (CCA), and cities and rural areas throughout Oklahoma. The UAB was established in 1993 within ODOC. The UAB modeled itself after the principles and ideology of the Aryan Brotherhood, a California-based prison gang that was formed in the California prison system during the 1960's.
 - c. The UAB had a detailed and uniform organizational structure, which was outlined along with various rules, procedures, and code of conduct in written "By-Laws"

widely distributed to members throughout Oklahoma and elsewhere.

d. The UAB had a defined militaristic structure. The UAB was overseen and directed by a 12-member “Main Council.” The Main Council had ultimate authority in all gang matters. Subordinate ranking members served to support the Main Council, and to enforce UAB members’ discipline and adherence to established UAB rules and laws. Members of the Main Council were generally imprisoned at Oklahoma State Penitentiary-McAlester, commonly referred to as the “Walls,” but Main Council members could often be found at other institutions throughout the Oklahoma penal system. The “Sub-Council” reported to the Main Council and functioned in each medium security prison throughout Oklahoma. The Sub-Council was treated as an extension of the Main Council. Members of the Sub-Council passed down orders from the Main Council and had the authority to issue orders to lower ranking members within their respective institutions.

e. Each prison facility had a UAB “Yard Captain” who reported to the Sub-Council. The Yard Captain, who was also referred to as a “Shot-Caller,” carried out orders handed down from the Sub-Council. The Yard Captain was considered a frontline leader in any conflict inside the Yard Captain’s prison. The Yard Captain collected intelligence, oversaw security, enforced order and imposed discipline as directed by the Sub-Council.

f. UAB members not holding rank were considered “soldiers.” Members of all ranks were expected to fight and commit acts of violence at the direction of senior leaders. The Main Council and other UAB leadership also issued orders and directed the criminal activity of UAB members in the “free world,” that is, UAB members and associates who were not incarcerated.

g. UAB leaders had the authority within the gang to issue “D.O.’s” (direct orders) and to mete out punishment. A “D.O.” was an assignment given to a subordinate UAB member that would serve a purpose for the UAB. The “D.O.” could range from a leader ordering a “S.O.S.” (stab on sight), meaning the assault of a rival gang member or of a UAB member who had committed a violation of the UAB rules, to a “green light,” or “X,” meaning the murder of a rival gang member or of an UAB member who had committed an egregious violation of the gang’s rules. Failure to perform a “D.O.” resulted in the assigned member being in violation of the rules. Punishment for failing to complete the “D.O.” could range anywhere from a beating to death.

h. The UAB employed a robust symbology as well, using depictions of Nazi-era inspired symbols and artwork to demonstrate their affiliation. Members often had tattoos incorporating one or more Nazi-era symbols including, but not limited to, the Nazi flag, swastika, Iron Eagle and Schutzstaffel (“SS”) lightning bolts. The most coveted tattoo of UAB membership was the UAB patch, which could be worn only by a fully-made member who ascended to full membership by successfully completing his prospecting period. The design and shape of the patch would vary, but usually consisted

of a circular design with "SS" lightning bolts in the middle. Phrases unique to the UAB lexicon included "14-88," "2112," "U.F.F.E," and "T.T.B.B.E." The phrase "14-88" was used by UAB gang members to demonstrate their collective affiliation to the gang, which was also popular among other Aryan Brotherhood, Neo-Nazi and White Supremacist organizations. The "14" in "14-88" was an alphanumeric code that referred to a phrase known as the "Fourteen Words" which read: "we must secure the existence of our people and a future for white children." The "88" in "14-88" referred to the letter H which is the eighth letter in the alphabet and signified the phrase "Heil Hitler." The alphanumeric code "2112" referenced the twenty-first, first, and second letters of the alphabet, and spelling out "U.A.B." The letters "U.F.F.U." formed an acronym representing "Universal Forever, Forever Universal." The letters "T.T.B.B.E" stood for "Till The Bitter Bloody End." The gang also incorporated these phrases into tattoos, which they used to show their membership in the gang. The colors associated with the UAB were black and red, and members of the UAB often demonstrated their affiliation with the UAB by wearing clothing containing the colors black and red or incorporating some of the gang's other symbols or phrases.

i. Once released from incarceration, UAB members were required to remain loyal to the UAB and were required to immediately report to outside or incarcerated leaders to further the goals of the UAB through criminal activity. One of the goals of the

UAB was to recruit new members. UAB members were recruited from both inside and outside the Oklahoma penal system.

j. UAB members were required to find new members for the gang, commonly referred to as “prospects.” In order to be considered for UAB membership, a person had to be sponsored by a fully-patched member. The sponsoring UAB member was responsible for conducting a background investigation of the prospect to ensure that he was not a sex offender, a law enforcement cooperator, or otherwise undesirable for gang membership. Once sponsored, a prospective member had to serve an unspecified term and his conduct was observed by other gang members. During this period, the prospect was required to study and learn the UAB by-laws and was required to “put in work” for the gang by carrying out tasks or “missions” ordered by members of the UAB in order to prove his loyalty to the gang. Missions included, but were not limited to, violent assaults against rival gangs or UAB members who had violated UAB by-laws. If a prospect had successfully completed his “missions,” he would become a fully-patched member upon the majority vote of the Main Council.

k. In addition to members, the enterprise included those closely affiliated with the UAB, who were called “associates.” While females were not allowed to become members of the UAB, those who associated with the UAB and engaged in criminal activity for the benefit of the UAB were often referred to as “featherwoods.” Associates who did not fulfill their obligations to the UAB were sometimes subjected to violence.

Female associates functioned as communication hubs, facilitating gang communication among imprisoned members through the use of the telephone, the internet and The United States mail. Female associates also transported illegal drugs and managed the financial proceeds from drug sales at the direction of ranking UAB members.

THE RACKETEERING ENTERPRISE

3. The UAB, including its leaders, members, and associates constituted an “enterprise,” as defined in Title 18, United States Code, Section 1961(4) (hereinafter “the enterprise”), that is, a group of individuals associated in fact. The enterprise constituted an ongoing organization whose members and associates functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise. This enterprise was engaged in, and its activities affected, interstate and foreign commerce.

PURPOSES OF THE ENTERPRISE

4. 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, the illegal trafficking of controlled substances and firearms.
- b. Preserving and protecting the power, territory, operations, and proceeds of the enterprise through the use of threats, intimidation, violence, and destruction.
- 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. The leaders, members, and associates of the enterprise undertook all steps necessary to prevent the detection of their criminal activities and sought to prevent and resolve the imposition of any criminal liabilities upon their leaders, members, and associates, by the use of violence and intimidation directed against witnesses, victims, and others.

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

MANNER AND MEANS OF THE CONSPIRACY

5. The defendants and co-conspirators agreed to facilitate a scheme that included the operation and management of the enterprise by a conspirator. Members and associates of the enterprise operated and conducted their affairs through a series of rules and policies, some of which were codified in by-laws.

a. The members and associates of the enterprise would meet on occasion to collect money, mete-out punishment or declare war on rival gang members.

b. To enforce discipline and the rules of the enterprise, members and associates of the enterprise engage in a system in which the defendants and others, physically assaulted and threatened those members and associates of the enterprise who violated rules, questioned authority, or posed a threat to the leaders, members, or purposes of the enterprise.

c. Members and associates of the enterprise employed and used gang-related terminology, symbols, gestures, and color schemes.

d. To perpetuate the enterprise and to maintain and extend its power, members and associates of the enterprise committed and conspired to intimidate and assault individuals who posed a threat to the enterprise or jeopardized its operations, including rival gang members, UAB gang members who violated the gang's by-laws, and witnesses to illegal activities of the enterprise.

e. Members and associates of the enterprise managed the procurement, transfer, use, concealment, and disposal of firearms and dangerous weapons within the enterprise to protect gang-related criminal activities, personnel, and operations and to deter, eliminate, and retaliate against competitors and other rival criminal organizations and persons.

f. Members and associates of the enterprise regularly financed their activities through funds obtained in the illegal trafficking of controlled substances, including, but not limited to, the distribution and possession with the intent to distribute methamphetamine and marijuana.

g. Members and associates of the enterprise committed acts of violence and intimidation to exert control over illegal narcotic markets.

h. Members and associates of the enterprise misrepresented, concealed, hid, and caused to be misrepresented, concealed, and hidden, the objectives of acts done in

furtherance of the conspiracy, and used coded language and other means to avoid detection and apprehension by law enforcement authorities.

i. **ANTHONY RAMON HALL, a/k/a “Tony”, RONNIE DEAN HASKINS, a/k/a “Dirty Red”, AARON CLAY KING, WILLIAM BENTON WILLIAMS, a/k/a “Will”, MATTHEW BRIAN WAGNER, a/k/a “Red”, RICHARD ALLEN ROBERTS, a/k/a “Ricky”, KRISTIN MICHELL BRIGHT, CARL MATTHEW SMITH, and TIMOTHY DUANE BUCK,** did knowingly, intentionally and willfully conspire, confederate and agree with each other and with others known and unknown to the Grand Jury to commit offenses against the United States as follows:

(1) To possess with the intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine a Schedule II controlled substance;

(2) To distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

(3) To possess with the intent to distribute 50 grams or more of methamphetamine, a Schedule II controlled substance; and

(4) To distribute 50 grams or more of methamphetamine, a Schedule II controlled substance.

(5) To possess with the intent to distribute a substantial amount of marijuana, a schedule I drug.

(6) To distribute a substantial amount of marijuana, a schedule I drug.

All in violation of Title 21, United States Code, Sections 846 and 841(a)(1) and 841(b)(1)(A)(viii).

THE RACKETEERING CONSPIRACY

6. Beginning on a date unknown to the grand jury, but at least as early as in or about 2005, and continuing through on or about the date of this Indictment, in the Northern District of Oklahoma and elsewhere, the defendants, **ANTHONY RAMON HALL**, a/k/a “Tony”, **RONNIE DEAN HASKINS**, a/k/a “Dirty Red”, **AARON CLAY KING**, **WILLIAM BENTON WILLIAMS**, a/k/a “Will”, **MATTHEW BRIAN WAGNER**, a/k/a “Red”, **RICHARD ALLEN ROBERTS**, a/k/a “Ricky”, **KRISTIN MICHELLE BRIGHT**, **CARL MATTHEW SMITH**, and **TIMOTHY DUANE BUCK**, being persons employed by and associated with the UAB, an enterprise engaged in and the activities of which affected foreign and interstate commerce, did knowingly conspire, confederate and agree with each other and with others known and unknown to the Grand Jury to Violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate directly and indirectly in the conduct of the affairs of the enterprise through a pattern of racketeering activity as defined in Title 18, United States Code, Sections 1961(1) and 1961(5) involving drug trafficking, in violation of Title 21, United States Code, Sections 841(a)(1) (possession with intent to distribute and distribution of controlled substances) and 846 (conspiracy to possess with the intent to

distribute and to distribute controlled substances); multiple acts indictable under Title 18, United States Code, Section 1956 (money laundering); and multiple acts involving: kidnapping, chargeable under Title 21, Oklahoma Statutes Annotated, Section 741; and arson, chargeable under Title 21, Oklahoma Statutes Annotated, Section 1403(A). It was part of this conspiracy that the defendants agreed that a conspirator would commit at least two acts of racketeering in the conduct of the affairs of the enterprise.

OVERT ACTS

7. In furtherance of the conspiracy and to achieve the objects thereof, the defendants performed and caused to be performed the following overt acts, among others, in the Northern District of Oklahoma, and elsewhere.

a. In or about 2005, **MATTHEW BRIAN WAGNER** a/k/a “Red,” stabbed a rival gang member following a standing order from UAB’s leadership to retaliate for the murder of an imprisoned UAB gang member.

b. Beginning on a date unknown to the Grand Jury, but at least as early as 2011, and continuing through the date of this Indictment, **ANTHONY RAMON HALL**, a/k/a “Tony”, **RONNIE DEAN HASKINS**, a/k/a “Dirty Red”, **AARON CLAY KING**, **WILLIAM BENTON WILLIAMS**, a/k/a “Will”, **MATTHEW BRIAN WAGNER**, a/k/a “Red”, **RICHARD ALLEN ROBERTS**, a/k/a “Ricky”, **KRISTIN MICHELLE BRIGHT**, **CARL MATTHEW SMITH**, and **TIMOTHY DUANE BUCK**, and others known and unknown to the Grand Jury, sold methamphetamine for the benefit of the UAB enterprise.

c. Beginning on a date unknown to the Grand Jury, but at least as early as 2011, and continuing through the date of this Indictment, **MATTHEW BRIAN WAGNER**, a/k/a “Red”, **CARL MATTHEW SMITH**, **TIMOTHY DUANE BUCK**, and others known and unknown to the Grand Jury, sold marijuana for the benefit of the UAB enterprise.

d. Beginning on a date unknown to the Grand Jury, but at least as early as 2011, and continuing through the date of this indictment, **CARL MATTHEW SMITH**, **TIMOTHY DUANE BUCK**, and others known and unknown to the Grand Jury, used Green-Dot prepaid debit cards to transfer drug proceeds to imprisoned UAB gang members.

e. In or about August 2011, **RICHARD ALLEN ROBERTS**, a/k/a “Ricky”, and others known and unknown to the Grand Jury, assaulted an imprisoned rival gang member on orders from senior UAB gang members.

f. In or about October 2011, **RICHARD ALLEN ROBERTS**, a/k/a “Ricky”, and others known and unknown to the Grand Jury, assaulted an imprisoned rival gang member on orders from senior UAB gang members.

g. In or about October 2012, and continuing through at least February 2013, **MATTHEW BRIAN WAGNER**, a/k/a “Red”, transported and deposited thousands of dollars of drug proceeds into bank accounts at the direction of the UAB enterprise.

k. In or about February 2013, **TIMOTHY DUANE BUCK**, a/k/a “Tim”, and others known and unknown to the Grand Jury, stole a vehicle from an individual whom the UAB believed owed a drug debt to the UAB enterprise.

1. On or about February 13, 2013, **MATTHEW BRIAN WAGNER**, a/k/a “Red”, and others known and unknown to the Grand Jury, provided transport and assistance to an imprisoned UAB gang member who had escaped from Oklahoma state custody.

m. On or about April 4, 2013, **CARL MATTHEW SMITH** offered money to a subordinate gang associate to coordinate the beating of an individual who the UAB believed had failed to pay a drug debt.

n. On or about April 12, 2013, **CARL MATTHEW SMITH** and **TIMOTHY DUANE BUCK**, a/k/a “Tim”, discussed the purchase of firearms for the UAB enterprise.

o. On or about May 2, 2013, **RONNIE DEAN HASKINS**, a/k/a “Dirty Red”, **AARON CLAY KING**, **ROBERT ALLEN PAUL BRYAN**, **RODNEY LEE BROOMHALL**, a/k/a “Buddha”, **KRISTIN MICHELLE BRIGHT**, and others known and unknown to the Grand Jury, kidnapped a UAB gang member who the gang believed had failed to supply drugs to the UAB enterprise.

p. On or about May 2, 2013, **KRISTIN MICHELLE BRIGHT** drove a vehicle in which **RONNIE DEAN HASKINS**, a/k/a “Dirty Red”, was a passenger, to a location where **BRIGHT** and **HASKINS** believed the victim of the intended kidnapping would be located. After locating the victim, **BRIGHT** drove **HASKINS** to another location where UAB members and associates severely assaulted the victim.

q. On or about May 2, 2013, an unindicted co-conspirator drove a vehicle, in which **AARON CLAY KING** was a passenger, that transported a kidnapped UAB gang

member to an apartment where the UAB member was severely assaulted by UAB gang members.

r. On or about May 2, 2013, **RODNEY LEE BROOMHALL**, a/k/a “Buddha”, supplied a knife that was heated and used to burn a UAB patch-tattoo from the neck of a UAB member whom the UAB believed had failed to supply drugs to the UAB enterprise.

s. On or about May 2, 2013, **RONNIE DEAN HASKINS**, a/k/a “Dirty Red”, and **ROBERT ALLEN PAUL BRYAN** held down a UAB member while **AARON CLAY KING** placed a heated knife on the UAB member’s neck in order to burn off a UAB patch-tattoo, because the UAB believed the member had failed to properly supply and distribute drugs to the UAB enterprise.

t. From at least June 2013, and continuing through at least August 2013, **RICHARD ALLEN ROBERTS**, and others known and unknown to the Grand Jury, deposited thousands of dollars in drug proceeds into various bank accounts at the direction of the UAB leadership.

u. On or about March 24, 2014, **ANTHONY RAMON HALL**, a/k/a “Tony”, and others known and unknown to the Grand Jury, burned the vehicle of a drug buyer whom the UAB believed owed a drug debt to the UAB enterprise.

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

COUNT TWO
[21 U.S.C. § 846]

Beginning on an exact date unknown to the Grand Jury, but at least as early as in or about 2010, and continuing through the date of this Indictment, in the Northern District of Oklahoma and elsewhere, the defendants, **ANTHONY RAMON HALL**, a/k/a “Tony”, **RONNIE DEAN HASKINS**, a/k/a “Dirty Red”, **AARON CLAY KING**, **WILLIAM BENTON WILLIAMS**, a/k/a “Will”, **MATTHEW BRIAN WAGNER**, a/k/a “Red”, **RICHARD ALLEN ROBERTS**, a/k/a “Ricky”, **KRISTIN MICHELLE BRIGHT**, **CARL MATTHEW SMITH**, and **TIMOTHY DUANE BUCK**, did knowingly, intentionally and willfully conspire, confederate and agree with each other and others known and unknown to the Grand Jury to violate Title 21, United States Code, Section 841(a)(1) to wit:

1. to knowingly and intentionally possess with the intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;
2. to knowingly and intentionally distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance; and
3. to knowingly and intentionally possess with the intent to distribute 50 grams or more of methamphetamine, a Schedule II controlled substance; and
4. to knowingly and intentionally distribute 50 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(A)(viii).

COUNT THREE
[18 U.S.C. § 1959(a)(1)]

1. At all times relevant to this Indictment, the UAB, as more fully described in paragraphs One through Five of this 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 UAB constituted an ongoing enterprise whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

2. At all times relevant to this Indictment, the above-described enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, acts involving (a) drug trafficking, in violation of Title 21, United States Code, Sections 841(a)(1), 843 and 846, (b) kidnapping, in violation of Title 21, Oklahoma Statutes Annotated, Section 741, and (c) money laundering, in violation of Title 18, United States Code, Section 1956.

3. On or about May 2, 2013, in the Northern District of Oklahoma, and elsewhere, the defendants, **RONNIE DEAN HASKINS**, a/k/a “Dirty Red”, **AARON CLAY KING**, **ROBERT ALLEN PAUL BRYAN**, **RODNEY LEE BROOMHALL**, a/k/a “Buddha”, **KRISTIN MICHELLE BRIGHT**, and others known and unknown to the Grand Jury, aiding and abetting each other, for the purpose of maintaining and increasing position within the UAB, an enterprise engaged in racketeering activity,

kidnapped FH, in violation of Title 21, Oklahoma Statutes Annotated, Section 741.

All in violation of Title 18, United States Code, Section 1959(a)(1) and 2.

COUNT FOUR
[18 U.S.C. 1959(a)(2)]

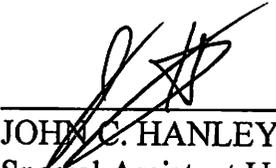
1. Paragraphs One and Two of Count Three in this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

2. On or about May 2, 2013, in the Northern District of Oklahoma, for the purpose of gaining entrance to and maintaining and increasing position in the UAB, an enterprise engaged in racketeering activity, the defendants, **RONNIE DEAN HASKINS**, a/k/a "Dirty Red", **AARON CLAY KING**, **ROBERT ALLEN PAUL BRYAN**, **RODNEY LEE BROOMHALL**, a/k/a "Buddha", **KRISTIN MICHELLE BRIGHT**, and others known and unknown to the Grand Jury, aiding and abetting each other, did knowingly, intentionally and willfully maim FH, in violation of Title 21, Oklahoma Statutes Annotated, Section 751.

All in violation of Title 18, United States Code, Section 1959(a)(2) and 2.

DANNY C. WILLIAMS, SR.
UNITED STATES ATTORNEY

A TRUE BILL



JOHN C. HANLEY
Special Assistant United States Attorney

/s/Grand Jury Foreperson

Grand Jury Foreperson