

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA
NORTHWESTERN DIVISION

UNITED STATES OF AMERICA

v.

RONNIE RAY TAYLOR;
RODNEY LEE JACKSON;
TERRANCE DARSHAY LYNN
PETERSON, a/k/a "TURTLE;"
VICTOR MURILLO, a/k/a "VIC;"
DEBRA MELADORE DAVIS;
BRYAN KEITH DAVIS;
REGINA ROSE LEHMAN;
MICHAEL JOHN GIETL;
ROBERT RAYMOND ALTHAUS;
PEGGY LEE ST. CLAIRE;
JADE MARIE BACKMAN;
CODY LEE DEHARTY;
RICKY DEAN STRAHAN;
GERALD WAYNE OSBY, JR.;
JAMES ALEX LOCKLEAR;
ALYSSA JO SCHLIENZ;
AUDRA DEZZARI HARRIS;
GILBERT EUGENE GRAIM, JR.;
TEOSHALASHANAE M. SONGCUAN;
DEANDRE TRAYVON PETERSON;
JIMMY DALE PRICE; and,
MIRANDA LEIGH GRANT

I N D I C T M E N T

Case No. _____

Violation: 18 U.S.C. §§ 2, 922(g)(1),
924(a)(2), 924(c)(1)(A)(i), 924(d), and
1956(h); 21 U.S.C. §§ 841(a)(1),
841(b)(1)(A)(viii), 841(b)(1)(C) and 846;
28 U.S.C. § 2461(c)

COUNT ONE

Conspiracy to Distribute and Possess with Intent to Distribute Methamphetamine

The Grand Jury Charges:

Beginning in or about 2014 and continuing until the date of this Indictment, in the District of North Dakota, and elsewhere,

RONNIE RAY TAYLOR;
RODNEY LEE JACKSON;
TERRANCE DARSHAY LYNN PETERSON, a/k/a "TURTLE;"
VICTOR MURILLO, a/k/a "VIC;"
DEBRA MELADORE DAVIS;
BRYAN KEITH DAVIS;
REGINA ROSE LEHMAN;
MICHAEL JOHN GIETL;
ROBERT RAYMOND ALTHAUS;
PEGGY LEE ST. CLAIRE;
JADE MARIE BACKMAN;
CODY LEE DEHARTY;
RICKY DEAN STRAHAN;
GERALD WAYNE OSBY, JR.;
JAMES ALEX LOCKLEAR;
ALYSSA JO SCHLIENZ;
AUDRA DEZZARI HARRIS;
GILBERT EUGENE GRAIM, JR.;
TEOSHALASHANAE M. SONGCUAN;
DEANDRE TRAYVON PETERSON;
JIMMY DALE PRICE; and,
MIRANDA LEIGH GRANT

knowingly and intentionally combined, conspired, confederated, and agreed together and with others, both known and unknown to the grand jury, to distribute and possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United

States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

Drug Quantity

With respect to the defendants RONNIE RAY TAYLOR; RODNEY LEE JACKSON; VICTOR MURILLO, a/k/a “VIC;” DEBRA MELADORE DAVIS; MICHAEL JOHN GIETL; ROBERT RAYMOND ALTHAUS; RICKY DEAN STRAHAN; GILBERT EUGENE GRAIM, JR.; TEOSHALASHANAE M. SONGCUAN; DEANDRE TRAYVON PETERSON; JIMMY DALE PRICE; and MIRANDA LEE GRANT, the amount involved in the conspiracy attributable to each of these defendants as a result of that defendant’s own conduct, and the conduct of other conspirators reasonably foreseeable to that defendant, is 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, in violation of Title 21, United States Code, Section 841(b)(1)(A)(viii).

Overt Acts

In furtherance of this conspiracy and to effect and accomplish the objects of it, one or more of the conspirators committed the following overt acts:

1. It was a part of said conspiracy that the defendants and others would and did distribute, and possess with intent to distribute, methamphetamine, a Schedule II controlled substance, in Minot, North Dakota, and elsewhere, including, but not limited to, the following:

- a. On or about September 24, 2014, the defendants JAMES ALEX LOCKLEAR and ALYSSA JO SCHLIENZ, individually and by

aiding and abetting, distributed approximately 4 grams of a mixture and substance containing a detectable amount of methamphetamine to another person;

- b. On or about October 9, 2014, the defendants RONNIE RAY TAYLOR and TERRANCE DARSHAY LYNN PETERSON, a/k/a “TURTLE,” individually and by aiding and abetting, distributed approximately 1 ounce of a mixture and substance containing a detectable amount of methamphetamine to another person;
- c. On or about October 9, 2014, the defendant DEBRA MELADORE DAVIS distributed approximately 1 ounce of a mixture and substance containing a detectable amount of methamphetamine to another person;
- d. On or about October 16, 2014, the defendant DEBRA MELADORE DAVIS distributed approximately 1 gram of a mixture and substance containing a detectable amount of methamphetamine to another person;
- e. On or about October 16, 2014, the defendant PEGGY LEE ST. CLAIRE distributed approximately 1 gram of a mixture and substance containing a detectable amount of methamphetamine to another person;
- f. On or about October 17, 2014, the defendant PEGGY LEE ST. CLAIRE distributed approximately 4 grams of a mixture and

substance containing a detectable amount of methamphetamine to another person;

- g. On or about October 20, 2014, the defendant PEGGY LEE ST. CLAIRE distributed approximately 1 ounce of a mixture and substance containing a detectable amount of methamphetamine to another person;
- h. On or about October 29, 2014, the defendant ROBERT RAYMOND ALTHAUS distributed approximately 1 ounce of a mixture and substance containing a detectable amount of methamphetamine to another person;
- i. On or about November 4, 2014, the defendant ROBERT RAYMOND ALTHAUS distributed approximately 1 ounce of a mixture and substance containing a detectable amount of methamphetamine to another person;
- j. On or about December 16, 2014, the defendants JADE MARIE BACKMAN and CODY LEE DEHARTY, individually and by aiding and abetting, distributed approximately 12 grams of a mixture and substance containing a detectable amount of methamphetamine to another person; and,
- k. On or about December 30, 2014, the defendant BRYAN KEITH DAVIS and REGINA ROSE LEHMAN, individually and by aiding and abetting, distributed approximately 1 ounce of a mixture and

substance containing a detectable amount of methamphetamine to another person;

2. It was further a part of said conspiracy that the defendants and others would and did attempt to conceal their activities;

3. It was a further part of said conspiracy that the defendants and others would and did use United States currency in their drug transactions;

4. It was a further part of said conspiracy that one or more of the conspirators deposited and removed proceeds of drug distribution activity through accounts at various financial institutions in North Dakota and California;

5. It was a further part of said conspiracy that the defendants and others would and did use telecommunication facilities, including cellular telephones, to facilitate the distribution of methamphetamine and other controlled substances;

6. It was a further part of said conspiracy that one or more conspirators traveled between California and North Dakota, and elsewhere, to obtain and distribute methamphetamine;

7. It was a further part of said conspiracy that one or more conspirators possessed firearms to protect and conceal their drug trafficking activity; and,

8. It was a further part of said conspiracy that one or more conspirators rented motor vehicles for use in transporting methamphetamine.

In violation of Title 21, United States Code, Section 846; Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT TWO

Distribution of Methamphetamine (500 grams or more)

The Grand Jury Further Charges:

From in or about 2014 and continuing until the date of this Indictment, in the
District of North Dakota,

RONNIE RAY TAYLOR;
RODNEY LEE JACKSON;
VICTOR MURILLO, a/k/a "VIC;"
DEBRA MELADORE DAVIS;
MICHAEL JOHN GIETL;
ROBERT RAYMOND ALTHAUS;
RICKY DEAN STRAHAN;
GILBERT EUGENE GRAIM, JR.;
TEOSHALASHANAE M. SONGCUAN;
DEANDRE TRAYVON PETERSON;
JIMMY DALE PRICE; and,
MIRANDA LEIGH GRANT,

individually and by aiding and abetting, knowingly and intentionally distributed 500
grams or more of a mixture and substance containing a detectable amount of
methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and
841(b)(1)(A)(viii), and Title 18, United States Code, Section 2.

COUNT THREE

Distribution of Methamphetamine

The Grand Jury Further Charges:

From in or about 2014 and continuing until the date of this Indictment, in the
District of North Dakota,

TERRANCE DARSHAY LYNN PETERSON, a/k/a “TURTLE;”
BRYAN KEITH DAVIS;
REGINA ROSE LEHMAN;
PEGGY LEE ST. CLAIRE;
JADE MARIE BACKMAN;
CODY LEE DEHARTY;
GERALD WAYNE OSBY, JR.;
JAMES ALEX LOCKLEAR;
ALYSSA JO SCHLIENZ; and,
AUDRA DEZZARI HARRIS,

individually and by aiding and abetting, knowingly and intentionally distributed a
mixture and substance containing a detectable amount of methamphetamine, a Schedule
II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C),
and Title 18, United States Code, Section 2.

COUNT FOUR

Conspiracy to Distribute and Possess with Intent to Distribute Heroin

The Grand Jury Further Charges:

From in or about December 2014 and continuing until in or about January 2015, in the District of North Dakota, and elsewhere,

RONNIE RAY TAYLOR;
VICTOR MURILLO, a/k/a "VIC;"
DEBRA MELADORE DAVIS;
MICHAEL JOHN GIETL; and,
RICKY DEAN STRAHAN,

knowingly and intentionally combined, conspired, confederated, and agreed together and with others, both known and unknown to the grand jury, to distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2;

Overt Acts

In furtherance of this conspiracy and to effect and accomplish the objects of it, one or more of the conspirators committed the following overt acts:

1. It was a part of said conspiracy that the defendants and others would and did distribute, and possess with intent to distribute, heroin, a Schedule I controlled substance, in Minot, North Dakota, and elsewhere;
2. It was further a part of said conspiracy that the defendants and others would and did attempt to conceal their activities;

3. It was a further part of said conspiracy that the defendants and others would and did use United States currency in their drug transactions;

4. It was a further part of said conspiracy that one or more of the conspirators rented a motor vehicle for purposes of transporting heroin from California to North Dakota;

5. It was a further part of said conspiracy that the defendants and others would and did use telecommunication facilities, including cellular telephones, to facilitate the distribution of heroin and other controlled substances;

6. It was a further part of said conspiracy that one or more conspirators traveled between California and North Dakota, and elsewhere, to obtain and distribute heroin; and,

7. It was a further part of said conspiracy that one or more conspirators possessed firearms to protect and conceal their drug trafficking activity;

In violation of Title 21, United States Code, Section 846; Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT FIVE

Possession of Methamphetamine with Intent to Distribute

The Grand Jury Further Charges:

On or about January 7, 2015, in the District of North Dakota,

MICHAEL JOHN GIETL

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SIX

Possession of a Firearm in Furtherance of a Drug Trafficking Crime

The Grand Jury Further Charges:

On or about January 7, 2015, in the District of North Dakota,

MICHAEL JOHN GIETL

during and in relation to a drug trafficking crime for which MICHAEL JOHN GIETL may be prosecuted in a court of the United States, namely, (i) Conspiracy to Distribute and Possess with Intent to Distribute Methamphetamine, as alleged in Count One of this Indictment; (ii) Distribution of Methamphetamine, as alleged in Count Two of this Indictment; (iii) Conspiracy to Distribute and Possess with Intent to Distribute Heroin, as alleged in Count Four of this Indictment; and (iv) Possession of Methamphetamine with Intent to Distribute, as alleged in Count Five of this Indictment, used and carried a firearm and, in furtherance of any such crime, possessed a firearm, namely, one Bryco Arms, Model Jennings Nine-CA, 9mm caliber pistol, Serial Number 1590444;

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT SEVEN

Possession of Methamphetamine with Intent to Distribute (50 grams or more actual)

The Grand Jury Further Charges:

On or about May 27, 2015, in the District of North Dakota,

MICHAEL JOHN GIETL

knowingly and intentionally possessed with intent to distribute 50 grams or more of methamphetamine (actual), a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii), and Title 18, United States Code, Section 2.

COUNT EIGHT

Possession of Heroin with Intent to Distribute

The Grand Jury Further Charges:

On or about May 27, 2015, in the District of North Dakota,

MICHAEL JOHN GIETL

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT NINE

Possession of a Firearm in Furtherance of a Drug Trafficking Crime

The Grand Jury Further Charges:

On or about May 27, 2015, in the District of North Dakota,

MICHAEL JOHN GIETL,

during and in relation to a drug trafficking crime for which MICHAEL JOHN GIETL may be prosecuted in a court of the United States, namely, (i) Conspiracy to Distribute and Possess with Intent to Distribute Methamphetamine, as alleged in Count One of this Indictment; (ii) Distribution of Methamphetamine, as alleged in Count Two of this Indictment; (iii) Possession of Methamphetamine with Intent to Distribute, as alleged in Count Seven of this Indictment; and (iv) Possession of Heroin with Intent to Distribute, as alleged in Count Eight of this Indictment, used and carried one or more firearms and, in furtherance of any such crime, possessed one or more firearms, namely: (i) one Weatherby, Model Mark V, .300 Winchester caliber rifle, Serial Number H244656; (ii) one Beretta USA Corp., Model 950BS, .22 short caliber pistol, Serial Number BER89120T; (iii) one Bersa, Model Thunder, .380 caliber pistol, Serial Number 912862; (iv) one Smith & Wesson, Model Bodyguard, .380 caliber pistol, Serial Number EAL5509; (v) one Ruger, Model P90DC, .45 caliber pistol, Serial Number 663-66770; (vi) one Ruger, Model Ranch, 5.56 caliber rifle, Serial Number 582-92296; and, (vii) one Sig-Sauer, Model 716, .308 caliber rifle, Serial Number 22G001707;

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 924(c)(1)(C)(i).

COUNT TEN

Possession of a Firearm by a Prohibited Person

The Grand Jury Further Charges:

On or about January 7, 2015, in the District of North Dakota,

MICHAEL JOHN GIETL,

having been convicted in any court of a crime punishable by imprisonment for a term exceeding one year, to wit: (a) on or about June 25, 2007, Possession of a Narcotic Drug (Cocaine) with Two Prior Convictions, a class 4 felony, in Pima County, Arizona, Case Number CR20070067; (b) on or about May 25, 2006, Possession of a Narcotic Drug For Sale, Cocaine Base, a class 2 felony, and Possession of Deadly Weapon by a Prohibited Possessor, a class 4 felony, in Pima County, Arizona, Case Number CR20060282; (c) on or about May 25, 2006, Solicitation to Unlawfully Possess a Narcotic Drug, Cocaine Base, a class 6 felony, and Unlawful Possession of Drug Paraphernalia, a class 6 felony, in Pima County, Arizona, Case Number CR20054877; and, (d) on or about April 16, 1996, Solicitation to Unlawful Possession of a Narcotic Drug, a class 6 felony, in Pima County, Arizona, Case Number CR-46908, did knowingly possess in and affecting commerce a firearm, that is, one Bryco Arms, Model Jennings Nine-CA, 9mm caliber pistol, Serial Number 1590444;

In violation of Title 18, United States Code, Sections 2, 922(g)(1), and 924(a)(2).

COUNT ELEVEN

Possession of a Firearm by a Prohibited Person

The Grand Jury Further Charges:

On or about May 27, 2015, in the District of North Dakota,

MICHAEL JOHN GIETL,

having been convicted in any court of a crime punishable by imprisonment for a term exceeding one year, to wit: (a) on or about June 25, 2007, Possession of a Narcotic Drug (Cocaine) with Two Prior Convictions, a class 4 felony, in Pima County, Arizona, Case Number CR20070067; (b) on or about May 25, 2006, Possession of a Narcotic Drug For Sale, Cocaine Base, a class 2 felony, and Possession of Deadly Weapon by a Prohibited Possessor, a class 4 felony, in Pima County, Arizona, Case Number CR20060282; (c) on or about May 25, 2006, Solicitation to Unlawfully Possess a Narcotic Drug, Cocaine Base, a class 6 felony, and Unlawful Possession of Drug Paraphernalia, a class 6 felony, in Pima County, Arizona, Case Number CR20054877; and, (d) on or about April 16, 1996, Solicitation to Unlawful Possession of a Narcotic Drug, a class 6 felony, in Pima County, Arizona, Case Number CR-46908, did knowingly possess in and affecting commerce a firearm, that is: (i) one Weatherby, Model Mark V, .300 Winchester caliber rifle, Serial Number H244656; (ii) one Beretta USA Corp., Model 950BS, .22 short caliber pistol, Serial Number BER89120T; (iii) one Bersa, Model Thunder, .380 caliber pistol, Serial Number 912862; (iv) one Smith & Wesson, Model Bodyguard, .380 caliber pistol, Serial Number EAL5509; (v) one Ruger, Model P90DC, .45 caliber pistol, Serial Number 663-66770; (vi) one Ruger, Model Ranch, 5.56 caliber rifle, Serial Number 582-

92296; and, (vii) one Sig-Sauer, Model 716, .308 caliber rifle, Serial Number 22G001707;

In violation of Title 18, United States Code, Sections 2, 922(g)(1), and 924(a)(2).

COUNT TWELVE

Money Laundering Conspiracy

The Grand Jury Further Charges:

Beginning in or about 2014 and continuing through the date of this Indictment, in the District of North Dakota, and elsewhere,

RONNIE RAY TAYLOR;
RODNEY LEE JACKSON;
PEGGY LEE ST. CLAIRE;
JADE MARIE BACKMAN;
CODY LEE DEHARTY;
JAMES ALEX LOCKLEAR; and,
ALYSSA JO SCHLIENZ

did knowingly combine, conspire, and agree with each other and with other persons, known and unknown to the Grand Jury, to commit offenses against the United States in violation of Title 18, United States Code, Section 1956(h), to wit: to knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is, knowingly and intentionally distributing controlled substances, (a) with intent to promote the carrying on of the specified unlawful activity, and knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i); and, (b) knowing that the transaction is designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity in violation of Title 18, United States Code, Section 1956(1)(B)(i);

MANNER AND MEANS

The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

1. Defendants and their co-conspirators began to acquire methamphetamine, a Schedule II controlled substance, for distribution. The methamphetamine was transported through, and distributed in, the District of North Dakota, and elsewhere, during the time frame of the conspiracy. Numerous individuals were used to transport the methamphetamine and money generated from the sale of methamphetamine;
2. Members of the methamphetamine distribution conspiracy organization would front (the practice of buying and selling narcotics on consignment) the methamphetamine to various distributors. The methamphetamine would eventually be sold and the currency collected and transported from one person to another to continue the ongoing illegal activity; and
3. During the course of this conspiracy, persons known and unknown to the Grand Jury, would deposit and withdraw money, which were the proceeds of the unlawful activity, from bank accounts in North Dakota and California;
4. During the course of this conspiracy, persons known and unknown to the Grand Jury, utilized money transfer services such as Western Union, Moneygram, and Green Dot Bank, to wire and transfer money from North Dakota to California;

All in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE ALLEGATION

The Grand Jury Further Finds Probable Cause That:

Upon conviction of Counts Six, Nine, Ten and Eleven alleged in this Indictment,

MICHAEL JOHN GIETL

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), all firearms involved in the commission of the offense, including, but not limited to, the following:

- one Bryco Arms, Model Jennings Nine-CA, 9mm caliber pistol, serial number 1590444;
- one Weatherby, Model Mark V, .300 Winchester caliber rifle, serial number H244656;
- one Beretta USA Corp., Model 950BS, .22 short caliber pistol, serial number BER89120T;
- one Bersa, Model Thunder, .380 caliber pistol, serial number 912862;
- one Smith & Wesson, Model Bodyguard, .380 caliber pistol, serial number EAL5509;
- one Ruger, Model P90DC, .45 caliber pistol, serial number 663-66770;

- one Ruger, Model Ranch, 5.56 caliber rifle, serial number 582-92296; and,
- one Sig-Sauer, Model 716, .308 caliber rifle, serial number 22G001707.

A TRUE BILL:

/s/ Grand Jury Foreperson
Foreperson

/s/ Christopher C. Myers
CHRISTOPHER C. MYERS
Acting United States Attorney

RLV/rab