

COPY

SEALED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

2018 APR 11 PM 1:30

UNITED STATES OF AMERICA

v.

JOSHUA DAVID LANÉ (1)

CRAIG GIBSON WILBUR (2)
aka "Wheezy"

MARICELLA NICOLE SEGOVIANO (3)

JAMES DAYTON ANDERSEN (4)
aka "Popeye"

DONALD FRANKLIN WILLIAMS (5)

TANYA LYNN SCROGGINS (6)
aka "Tanya Lynn Burns"

MATTHEW RANDALL AGAN (7)

JUSTIN RAY MONROE (8)

MIRIAM CRYSTAL HERRERA (9)

RALPH JAY ADAMS (10)
aka "Evil"

HEATHER MICHELLE BERNHAGEN (11)

ANDRIA DOLORES BOUCHER (12)

WILLIAM DOUGLAS BOURNE (13)

JERRY CARDENAS, JR. (14)

PRISCELLA MARIE CASTANEDA (15)

SARAH MARIE CHAMBERLAIN (16)
aka "Sarah Marie Hammons"

ANTHONY RAY CHAMBERLAIN (17)
aka "Big Ant"

JOSHUA LYNN CLAYTON (18)
aka "Joker"

AMBER CHERIE COOK (19)

STEPHEN BRADLEY COOK (20)

DEPUTY CLERK 

FILED UNDER SEAL

NO. 3:18-CR-6-D

Supersedes Indictment returned on
March 6, 2018

The first nine defendants were
previously indicted; the following 48
are listed in alphabetical order, as
opposed to culpability or hierarchy.

JERRY DEWAYNE COX (21)

SHAWN ALLEN DAVIS (22)
aka "Suicide"

BILLY JOE DUKE (23)

ALEXANDRA NICHOLE DYER (24)
aka "NaNa"

VINCENT DANIEL FANUS (25)

AMANDA MARIE GALLIPPO (26)

FOREST GEFFERT (27)
aka "Diamond"

TYLER JACOB GEHRKE (28)
aka "Greedy"

ERIC PHILLIP GROSS (29)

JEFFREY SCOTT HATFIELD (30)

JOHN PAUL HENDERSON (31)
aka "JP"

ELISSA SEGOVIA HERRERA (32)

RANDI MICHELLE JACKSON (33)

JASON JAIME (34)

GARRY CODY JONES (35)

ADAM TYLER LAMBERT (36)

CHRISTOPHER DEAN LANCASTER (37)

JASON DAVON LAURENSEN (38)

JERRY WAYNE LUNSFORD (39)
aka "Looney"

FRANCISCO JACOBO MAESTAS (40)
aka "Freaky"

ARTHUR MARIN, JR. (41)

DERRICK SHAWN MCCOY (42)
aka "Taz"

ASHLEY RENEE MERRITT (43)

JUSTIN MARK NELSON (44)
aka "Animal"

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JORGE ALBERTO NEVAREZ (45)

ASHLEY NICOLE NORRIS (46)

KRISTEN BLAZE O'MEARA (47)
aka "Purple"

MICHELLE MARIE PACE (48)

JOSIAH DAVID PHILLIPS (49)

LAWRENCE BRYCE PROBECK (50)

GARY WAYNE RATLIFF (51)
aka "Bama"

COREY EVAN ROBESON (52)
aka "Face"

BAILEY WAYNE SANDERS (53)

RENE SOLIS (54)

JEFFREY DAVID STALEY (55)

NGHIA PHUOC TRAN (56)

JOSE LUIZ ZAVALA (57)
aka "Wicho"

FILED UNDER SEAL

THIRD SUPERSEDING INDICTMENT

The United States Grand Jury charges:

Introduction

1. At all times relevant to the Third Superseding Indictment, the defendants were members of, associated with, or performed drug transactions with various white supremacists organizations or individuals, including the "Aryan Circle," the "Aryan Brotherhood of Texas," the "Aryan Brotherhood," the "Peckerwoods," the "Soldiers of Aryan Culture," and the "Dirty White Boys," and engaged in a conspiracy to distribute methamphetamine and other illegal narcotics throughout the Northern District of Texas and elsewhere. Certain defendants used firearms and physical violence to further their drug trafficking activities.

Criminal Organizations

2. The "Aryan Circle" was a white supremacist gang based primarily in Texas. The Aryan Circle prison gang formed when certain ABT members splintered off to form what they believed was a more ideologically pure group. Aryan Circle members believed in the complete separation of the races. The Aryan Circle was also an organized crime group, but, in recent years, its white supremacy ideology often took a backseat to traditional criminal ventures, such as drug-dealing.

3. The "Aryan Brotherhood of Texas" (ABT) was a white supremacist gang based in Texas. The ABT originated in Texas prisons in the 1980s. The ABT offered protection to Caucasian inmates if they joined the gang. Over time, the ABT expanded and maintained a presence outside of prisons. ABT members referred to the gang as the "family." The ABT was also an organized crime group that put its "business" interests ahead of ideology in recent years. These business interests often take the form of criminal ventures, including drug-dealing.

4. The Aryan Brotherhood, which was sometimes referred to as the "Brand," was a white supremacist organization believed to have formed in prisons in California in the 1960s. The Aryan Brotherhood is believed to have had up to 20,000 members, both inside and outside of prison. There was no connection between the Aryan Brotherhood and the ABT in terms of origination or leadership. Members of the Aryan Brotherhood are often involved in the distribution of illegal narcotics.

5. The term "Peckerwood" was often used to describe an individual who, although not as member, shared a white supremacist ideology or aligned his or herself,

with other white supremacist organizations, such as the Aryan Circle or ABT. Individuals often resisted or denied membership with those groups because confirmed or documented membership typically resulted in administrative segregation within the Texas Department of Criminal Justice or other prison systems. This was typically viewed by prisoners as a less desirable way in which to serve prison time. Nonetheless, these individuals sought to indicate where their alliances resided through their identification as a "Peckerwood." Members were often referred to collectively as "Peckerwoods" or the "Wood Pile." Female members were often referred to as "Featherwoods." Other white supremacist organizations, such as the Aryan Circle or ABT also often referred to their members as "Peckerwoods" or "Woods." Despite their alliances with other white supremacists, the white supremacy ideology of Peckerwoods often takes a backseat to traditional criminal ventures, such as drug-dealing.

6. The Soldiers of Aryan Culture was a white supremacist gang formed in Utah in the mid-1990s. Members often tattooed the initials S.A.C. on their face or neck. The code of conduct required members to attack individuals they believe to be "snitches." Members of the Soldiers of Aryan Culture are often involved in the distribution of illegal narcotics.

7. The "Dirty White Boys" is a criminal organization, which originated in the Federal Bureau of Prisons in 1985 and stems from the name of a prison softball team. The Dirty White Boys gang is closely associated with the ABT and other white supremacy organizations. The Dirty White Boys gang was involved in the distribution of illegal narcotics.

8. Despite their differences, the Aryan Circle, ABT, Aryan Brotherhood, Peckerwoods, Soldiers of Aryan Culture, and the Dirty White Boys often collaborate with each other and with Mexican gangs and cartels for purposes of drug distribution or other illegal ventures.

9. Puro Tango Blast or Tango Blast is the term used to describe a group of criminal street and prison gangs that were based in Texas. Members were predominantly Hispanic, and each regional group was called a "tango." Tango Blast had a relaxed membership requirement and little to no detectable leadership hierarchy. Tango Blast members do not have to follow orders, attend organizational meetings, or pay other Tango members to be active; they also do not have to participate in any gang activities when they are out of prison. Tango Blast members are often involved in the distribution of illegal narcotics.

Defendants

At all times relevant to this Third Superseding Indictment:

10. Up to seventeen of the above listed defendants, including **Andria Dolores Boucher, Sarah Marie Chamberlain, Anthony Ray Chamberlain, Jerry Dewayne Cox, Shawn Allen Davis, Vincent Daniel Fanus, Amanda Marie Gallippo, Forest Geffert, Tyler Jacob Gehrke, Eric Phillip Gross, John Paul Henderson, Jason Jaime, Christopher Dean Lancaster, Justin Mark Nelson, Kristin Blaze O'Meara, Lawrence Bryce Probeck, and Corey Evan Robeson**, were members or close associates of the Aryan Circle.

11. Up to seven of the above listed defendants, including **Ralph Jay Adams, Joshua Lynn Clayton, Billy Joe Duke, Garry Cody Jones, Jerry Wayne Lunsford, Derrick Shawn McCoy, and Bailey Wayne Sanders**, were members or close associates of the ABT.

12. Up to four of the above listed defendants, including **James Dayton Anderson, Tanya Lynn Scroggins, Craig Gibson Wilbur, Jr., and Donald Franklin Williams**, were members or close associates of the Aryan Brotherhood.

13. Up to three of the above listed defendants, including **Randi Michelle Jackson, Joshua David Lane, and Ashley Renee Merritt**, were members or close associates of the Soldiers of Aryan Culture.

14. Up to two of the above listed defendants, including **Jason Davon Laurensen and Ashley Nicole Norris** were members or close associates of the Peckerwoods.

15. Up to one of the above listed defendants, including **Gary Wayne Ratliff**, was a member or close associate of the Dirty White Boys.

16. Up to six of the above listed defendants, including **Heather Michelle Bernhagen, Jerry Cardenas, Jr., Alexandra Nichole Dyer, Francisco Jacobo Maestas, Arthur Marin, Jr., and Jose Luiz Zavala** were members or close associates of Tango Blast.

Count One

Conspiracy to Commit Kidnapping

[Violation of 18 U.S.C. § 1201(c) (18 U.S.C. § 1201(a)(1)); 18 U.S.C. § 2.]

17. The allegations contained in paragraphs 1 through 16 are realleged and fully incorporated herein.

18. In or about January 2018 and February 2018, in the Dallas Division of the Northern District of Texas and elsewhere, the defendants, **Ralph Jay Adams, Justin Mark Nelson, Jerry Wayne Lunsford, and Amanda Gallippo** knowingly and willfully did combine, conspire, and agree with each other and with other persons both known and unknown to the Grand Jury to commit kidnapping, that is to seize, confine, kidnap, and hold an individual, known to the Grand Jury as “Victim A,” for some purpose and benefit, that is to obtain money or drugs that the defendants believed was in the custody or control of Victim A, and the defendants did use instrumentalities of interstate commerce, to wit: (1) a firearm, and (2) cellular telephones, in committing and in furtherance of the commission of this offense.

Objects of the Conspiracy

19. The object of the conspiracy to kidnap Victim A because certain defendants (**Adams and Lunsford**) believed Victim A had stolen drug proceeds that these defendants believed belonged to them. **Nelson** had actually stolen these proceeds and engaged in the kidnapping of Victim A to convince others that Victim A had stolen these funds, as opposed to **Nelson**.

Manner and Means of the Conspiracy

20. It was part of the conspiracy that the defendants held Victim A against his will.

21. It was part of the conspiracy that the defendants threatened and used actual physical force against Victim A.

22. It was part of the conspiracy that certain defendants ordered Victim A to be killed.

Overt Acts in Furtherance of the Conspiracy

23. **Nelson** negotiated a transaction involving \$600 worth of methamphetamine with **Adams** and **Lunsford**.

24. Victim A was assigned by **Adams** and **Lunsford** to pick up the methamphetamine from **Nelson** and deliver the agreed upon money. Victim A traveled to 622 Autumn Leaves Trail in Grand Prairie, Texas for this purpose.

25. **Nelson** obtained the money from Victim A but did not give Victim A the agreed upon drugs in exchange. Instead, **Nelson** stole the money.

26. Defendants **Adams** and **Lunsford** demanded an explanation from Victim A regarding the money/methamphetamine. Victim A explained that he had not received the money from Defendant **Nelson**. **Adams**, **Lunsford**, and others traveled to 622 Autumn Leaves Trail to confront **Nelson**.

27. Once there, **Nelson** identified himself as a member of the Aryan Circle and **Adams** and **Lunsford** identified themselves as members of the ABT. **Nelson** falsely, but convincingly, claimed that Victim A had stolen the money from **Adams** and **Lunsford**.

28. **Adams, Lunsford, Nelson, and Gallippo** – who were all present at 622 Autumn Leaves Trail – then held Victim A against his will and would not allow him to leave that location.

29. During this period, **Adams** pointed a pistol at Victim A's head.

30. During this period, **Lunsford** threatened to kill Victim A.

31. During this period, **Nelson** used a black hatchet to chop off a portion of Victim A's left index finger.

32. During this period, **Gallippo** hit Victim A with a large wooden object on the back of Victim A's head in attempt to render Victim A unconscious.

33. Victim A was held by these defendants for several days against his will.

34. **Adams** and **Lunsford** agreed that **Nelson** would take Victim A to another location and kill Victim A. **Nelson** did not go through with the killing and instead eventually let Victim A go.

All in violation of 18 U.S.C. § 1201 (c) and 18 U.S.C. § 1201 (a)(1).

Count Two

Conspiracy to Possess with Intent to Distribute a Controlled Substance
[Violation of 21 U.S.C. § 846 and 18 U.S.C § 2]

35. The allegations contained in paragraphs 1 through 34 are realleged and fully incorporated herein.

The Conspiracy

36. Between in or about October 2015, and in or about April 2018, in the Dallas Division of the Northern District of Texas and elsewhere, the defendants, **Joshua David Lane, Craig Gibson Wilbur, Maricella Nicole Segoviano, James Dayton Andersen, Donald Franklin Williams, Tanya Lynn Scroggins, Matthew Randall Agan, Justin Ray Monroe, Miriam Crystal Herrera, Ralph Jay Adams, Heather Michelle Bernhagen, William Douglas Bourne, Jerry Cardenas, Jr., Priscella Marie Castaneda, Sarah Marie Chamberlain, Anthony Ray Chamberlain, Joshua Lynn Clayton, Amber Cherie Cook, Stephen Bradley Cook, Jerry Dewayne Cox, Shawn Allen Davis, Billy Joe Duke, Alexandra Nichole Dyer, Vincent Daniel Fanus, Amanda Marie Gallippo, Forest Geffert, Tyler Jacob Gehrke, Eric Phillip Gross, Jeffrey Scott Hatfield, John Paul Henderson, Elissa Segovia Herrera, Randi Michelle Jackson, Jason Jaime, Garry Cody Jones, Adam Tyler Lambert, Christopher Dean Lancaster, Jason Davon Laurenson, Jerry Wayne Lunsford, Francisco Jacobo Maestas, Arthur Marin, Jr., Derrick Shawn McCoy, Ashley Renee Merritt, Justin Mark Nelson, Jorge Alberto Nevarez, Ashley Nicole Norris, Kristin Blaze O'Meara, Michelle Marie Pace, Lawrence Bryce Probeck, Gary Wayne Ratliff, Bailey Sanders, Rene Solis, Jeffrey David Staley, Nghia Phuoc Tran, and Jose Luiz Zavala** knowingly and intentionally

combined, conspired, confederated and agreed together and with each other, and with other persons known and unknown to the Grand Jury, to possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(A); all in violation of 21 U.S.C. § 846 and 18 U.S.C. § 2.

Manner and Means of the Conspiracy

During the conspiracy as alleged herein, it was part of the conspiracy that one or more of the defendants and conspirators would:

37. Arrange for the acquisition of methamphetamine from persons both known and unknown to the Grand Jury.

38. Arrange for the distribution and delivery of methamphetamine to persons both known and unknown to the Grand Jury.

39. Utilize stash houses and other locations to store quantities of methamphetamine.

40. Act as intermediaries and brokers to negotiate the acquisition, price, delivery, and payment for quantities of methamphetamine.

41. Sell or purchase methamphetamine from one another or for other persons known and unknown to the Grand Jury.

42. Utilize cellular telephones to discuss, negotiate, and facilitate drug transactions.

43. Each of the conspirators listed herein was linked to one another either directly or through another conspirator. Certain conspirators acted as hubs for narcotics trafficking, supplying methamphetamine to numerous other conspirators.

44. Certain conspirators did not know the identity of all of the other conspirators and did not know all of the details or all of the activities undertaken by other conspirators. There was no formal agreement entered into by the conspirators, instead, the conspirators entered into the conspiracy through their actions and drug transactions.

*All in violation of 21 U.S.C. § 846, the penalty for which is found at
21 U.S.C. § 841(b)(1)(A).*

Counts Three through Fifty

Possession of a Controlled Substance with Intent to Distribute
[Violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C) and 18 U.S.C. § 2]

45. The allegations contained in paragraphs 1 through 44 are realleged and fully incorporated herein.

46. On or about the dates listed below, in the Dallas Division of the Northern District of Texas and elsewhere, the defendants listed below, knowingly possessed with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841 (a)(1) and (b)(1)(C) and 18 U.S.C. § 2.

Count	Defendant	On/In or About
3	Joshua David Lane	November 27, 2017
4	Craig Gibson Wilbur	July 11, 2017
5	James Dayton Andersen	September 27, 2017
6	Maricella Nicole Segoviano	July 11, 2017
7	Donald Franklin Williams	December 30, 2017
8	Tanya Lynn Scroggins	September 27, 2017
9	Justin Ray Monroe	Jan. & Feb. 2018
10	Miriam Crystal Herrera	February 6, 2018
11	Heather Michelle Bernhagen	January 28, 2016
12	William Douglas Bourne	August 24, 2017
13	Jerry Cardenas, Jr.	November 17, 2017
14	Priscella Marie Castaneda	December 7, 2017
15	Sarah Marie Chamberlain	January 24, 2018
16	Anthony Ray Chamberlain	January 24, 2018
17	Joshua Lynn Clayton	Jan. 2016 to Dec. 2016
18	Stephen Bradley Cook	June 20, 2017
19	Jerry Dewayne Cox	Dec. 2017 & Jan. 2018
20	Shawn Allen Davis	October 1, 2017

Count	Defendant	On/In or About
21	Billy Joe Duke	Feb. 2016 to Oct. 2016
22	Alexandra Nichole Dyer	Jan. to Oct. 2017
23	Vincent Daniel Fanus	Jan. & Feb. 2018
24	Amanda Marie Gallippo	Jan. 2018
25	Forrest Geffert	April 6, 2018
26	Tyler Jacob Gehrke	May 24, 2017
27	Eric Phillip Gross	March 20, 2018
28	Jeffrey Scott Hatfield	June 20, 2017
29	John Paul Henderson	Jan. 2018
30	Elissa Segovia Herrera	August 30, 2017
31	Randi Michelle Jackson	April 2017 to Dec. 2017
32	Jason Jaime	May & June 2017
33	Garry Cody Jones	January 28, 2016
34	Adam Tyler Lambert	February 6, 2018
35	Christopher Dean Lancaster	February 24, 2017
36	Jason Davon Laurenson	May & June 2017
37	Francisco Jacobo Maestas	July 2015 to April 2018
38	Arthur Marin, Jr.	November 2, 2017
39	Derrick Shawn McCoy	October 7, 2015
40	Ashley Renee Merritt	July 2017 to Nov. 2017
41	Justin Mark Nelson	Mar. 2016 to Mar. 2018
42	Jorge Alberto Nevarez	Nov. 2015 to Mar. 2016
43	Ashley Nicole Norris	June 2017 to Feb. 2018
44	Kristin Blaze O'Meara	October 26, 2017
45	Michelle Marie Pace	Mar. 2018
46	Lawrence Bryce Probeck	Jan. 2018 to Mar. 2018
47	Gary Wayne Ratliff	November 1, 2015
48	Bailey Sanders	Jan. 2016 to Nov. 2017
49	Jeffrey David Staley	January 3, 2018
50	Nghia Phuoc Tran	Aug. 2017

Count Fifty-One
Possession of a Firearm by a Felon
[Violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2)]

47. The allegations contained in paragraphs 1 through 46 are realleged and fully incorporated herein.

48. On or about the dates listed below, in the Dallas Division of the Northern District of Texas, the defendants listed below, having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce a firearm, as described below, all in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).

Count	Defendant	On or About	Firearm
51	Josiah David Phillips	July 11, 2017	Bryco Arms Jennings Nine 9 mm handgun serial # 1392240
52	Christopher Dean Lancaster	February 24, 2017	Savage .22 caliber revolver serial # 45467
53	Francisco Jacobo Maestas	July 30, 2015	Sun City/Stevens 12 gauge shotgun serial # 150507B

Count Fifty-Four

Conspiracy to Possess with Intent to Distribute a Controlled Substance
[Violation of 21 U.S.C. § 846 and 18 U.S.C § 2]

49. The allegations contained in paragraphs 1 through 48 are realleged and fully incorporated herein.

50. In or about March 2017, in the Dallas Division of the Northern District of Texas and elsewhere, the defendants, **Andria Dolores Boucher**, **Forrest Geffert**, and **Corey Evan Robeson** knowingly and intentionally combined, conspired, confederated and agreed together and with each other, and with other persons known and unknown to the Grand Jury, to possess with intent to distribute a mixture or substance containing a detectable amount of U-47700, commonly known as “U-4” or “Pink,” a Schedule I controlled substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C).

All in violation of 21 U.S.C. § 846 and 18 U.S.C. § 2.

Count Fifty-Five
Possession with Intent to Distribute a Controlled Substance
[Violation of 21 U.S.C. § 841(b)(1)(C)]

51. The allegations contained in paragraphs 1 through 50 are realleged and fully incorporated herein.

52. Between in on or about May 2015 and in or about March 2016, in the Dallas Division of the Northern District of Texas and elsewhere, the defendant, **Jorge Alberto Nevarez**, knowingly possessed with intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of 21 U.S.C. § 841(a)(1) & (b)(1)(C).

Forfeiture Notice

[18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461
and 18 U.S.C. § 924(d) and 21 U.S.C. § 853(a)]

53. Upon conviction for Count One and/or Fifty-One, pursuant to 18 USC § 981(a)(1)(C) and 28 USC § 2461 or 18 U.S.C. § 924(d), and upon conviction for any of Counts Two through Fifty and Count Fifty-Two, pursuant to 21 U.S.C. § 853(a), the defendants, **Joshua David Lane, Craig Gibson Wilbur, Maricella Nicole Segoviano, James Dayton Andersen, Donald Franklin Williams, Tanya Lynn Scroggins, Matthew Randall Agan, Justin Ray Monroe, Miriam Crystal Herrera, Ralph Jay Adams, Heather Michelle Bernhagen, Andria Dolores Boucher, William Douglas Bourne, Jerry Cardenas, Jr., Priscella Marie Castaneda, Sarah Marie Chamberlain, Anthony Ray Chamberlain, Joshua Lynn Clayton, Amber Cherie Cook, Stephen Bradley Cook, Jerry Dewayne Cox, Shawn Allen Davis, Billy Joe Duke Alexandra Nichole Dyer, Vincent Daniel Fanus, Amanda Marie Gallippo, Forrest Geffert, Tyler Jacob Gehrke, Eric Paul Gross, Jeffrey Scott Hatfield, John Paul Henderson, Elissa Segovia Herrera, Randi Michelle Jackson, Jason Jaime, Garry Cody Jones, Adam Tyler Lambert, Christopher Dean Lancaster, Jason Davon Laurenson, Jerry Wayne Lunsford, Francisco Jacobo Maestas, Arthur Marin, Jr., Derrick Shawn McCoy, Ashley Renee Merritt, Justin Mark Nelson, Jorge Alberto Nevarez, Ashley Nicole Norris, Kristin Blaze O'Meara, Michelle Marie Pace, Josiah David Phillips, Lawrence Bryce Probeck, Gary Wayne Ratliff, Corey Evan Robeson, Bailey Sanders, Rene Solis, Jeffrey David Staley, Nghia Phuoc Tran, and Jose Luiz Zavala** shall forfeit to the United States of America all property, real or personal, constituting, or derived from, the

proceeds obtained, directly or indirectly, as a result of the respective offense; and any property, real or personal, used or intended to be used, in any manner or part, to commit or facilitate the commission of the respective offense. This specifically includes the following firearms:

1. a SKS RIFLE- Serial Number ZAPAP1001225 (as to **Lane** and **Merritt**);
2. a Beretta PX4 Storm-Serial Number PY64540 (as to **Lane** and **Jackson**);
3. a Sig Sauer P938 Serial Number 5213136556 (as to **Lane** and **Jackson**);
4. a Ruger SR 556 Serial Number 59126235 (as to **Lane** and **Jackson**);
5. \$10,788 seized from Segoviano on July 11, 2017 (as to **Wilbur** and **Segoviano**);
6. a Fabrique Nationale Herstal (FNH) USA, Model FNX-45, 45 Caliber Pistol, Serial Number FX3U043781, seized from Andersen (as to **Andersen** and **Williams**);
7. a Glock, Model 19 Gen 4, 9mm Caliber Rifle, Serial Number YZN534, seized from Andersen (as to **Andersen** and **Williams**);
8. a Glock, Model 19, 9mm Caliber Rifle, Serial Number BCAY930 (as to **Andersen** and **Williams**);
9. a Bryco Arms Jennings Nine 9mm handgun serial #1392240 (as to **Wilbur** and **Segoviano**);
10. a Glock 30 .45 caliber handgun serial #BBAU430 (as to **Wilbur** and **Segoviano**);
11. a Ruger LCP .380 handgun serial #371412172 (as to **Wilbur** and **Segoviano**);
12. a Beretta .22 handgun serial #DAA405390 (as to **Wilbur** and **Segoviano**);
13. a Taurus PT-22 .22 handgun, serial #34142 (as to **Scroggins**);
14. a Glock 42 .380 handgun, serial #AAVA421 (as to **Scroggins**);
15. a New Frontier model #LW-15 serial #NLV12079 rifle (as to **M. Herrera** and **Lambert**);
16. a Smith and Wesson model #15-22 serial #HBS7944 rifle (as to **M. Herrera** and **Lambert**);

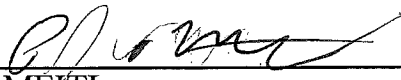
17. a Winchester model 42 serial #143199 shotgun (as to **M. Herrera and Lambert**);
18. a Sako model AV serial #595215 rifle (as to **M. Herrera and Lambert**);
19. a Asi model PAS12 serial #13P01906 shotgun (as to **M. Herrera and Lambert**);
20. a Norinco model SKS serial #25010180 rifle (as to **M. Herrera and Lambert**);
21. a Ruger model American 6903 serial #690-25945 rifle (as to **M. Herrera and Lambert**);
22. a American Tactical model .22LRHV serial #A497493 lower rifle receiver with a GSG-522 upper rifle receiver (as to **M. Herrera and Lambert**);
23. \$118,009.00 seized 02/06/2018 (as to **M. Herrera and Lambert**);
24. \$18,866.00 seized 02/06/2018 (as to **Scroggins**);
25. \$7,003.00 seized 02/06/2018 (as to **Wilbur and Segoviano**);
26. a Forest camouflaged body armor (as to **M. Herrera**);
27. a Primitive homemade suppressor (as to **M. Herrera and Lambert**);
28. a Taurus model PT-22 serial # AQE66728 (as to **E. Herrera**);
29. a Derringer model 750 Frontier serial # 44804 handgun (as to **E. Herrera**);
30. a Bryco Jennings model J-22 serial # 1060486 (as to **E. Herrera**);
31. a Savage .22 caliber revolver serial # 45467 (as to **Lancaster**);
32. a Mossberg 20 gauge shotgun with no known serial number (as to **Lancaster**);
33. a Sig Sauer P522 pistol serial # 30A00366 (as to **Laurenson**);
34. a Sun City/Stevens 12 gauge shotgun serial # 150507B (as to **Maestas**);
35. a Colt Police Positive .38 Special handgun serial # 30367R (as to **Nevarez**);
36. a Ruger P95DC 9mm handgun serial # 31122045 (as to **O'Meara**);
37. a Bryco Arms Jennings Nine 9 mm handgun serial # 1392240 (as to **Phillips**); and
38. a Ruger .45 caliber pistol serial # 660-26333 (as to **Tran**).

A TRUE BILL



FOREPERSON

ERIN NEALY COX
UNITED STATES ATTORNEY



P.J. MEITL
Assistant United States Attorney
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Virginia Bar No. 73215
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