

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

v.

MONTANA COOK

Defendant.

Case No. 1:26-cr-00025-JL-TSM

MEMORANDUM IN SUPPORT OF MOTION FOR PRETRIAL DETENTION

The United States of America, through undersigned counsel, submits this memorandum in support of the motion for pretrial detention of the above-captioned defendant. For the reasons discussed below, the government contends that the defendant poses a risk of flight and danger to the community, and that there are not adequate conditions to mitigate those risks.

A. Procedural History

On May 6, 2026, following a multi-year Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”) investigation, a grand jury sitting in this District returned indictment 26-cr-25-01/08-JL-AJ charging eight individuals, including Montana Cook, with one count of Conspiracy to Straw Purchase, in violation of 18 U.S.C. § 932(b)(2) and one count of Firearms Trafficking Conspiracy, in violation of 18 U.S.C. §§ 933(a)(1) and (3).

On May 12, 2026, ATF, along with partnering law enforcement agencies, executed arrest warrants for Tayson Terrance, Conrad Oakes, Montana Cook, and Ranonkwatseronhawi Gibson pursuant to the indictment. On March 14, 2026, the defendant is slated to have his initial appearance in the Northern District of New York. This memorandum addresses the known § 3142(g) factors for the above-captioned defendant and requests that a detention hearing be held and that the defendant be detained pending trial because of his risk of flight.

B. Legal Standard

Pursuant to 18 U.S.C. § 3142(f)(1)(E), the Court shall hold a detention hearing upon motion of an attorney for the government in a case that involves the possession or use of a firearm.

C. Discussion of 3142(g) Factors

1. Nature and Circumstances of the Offense

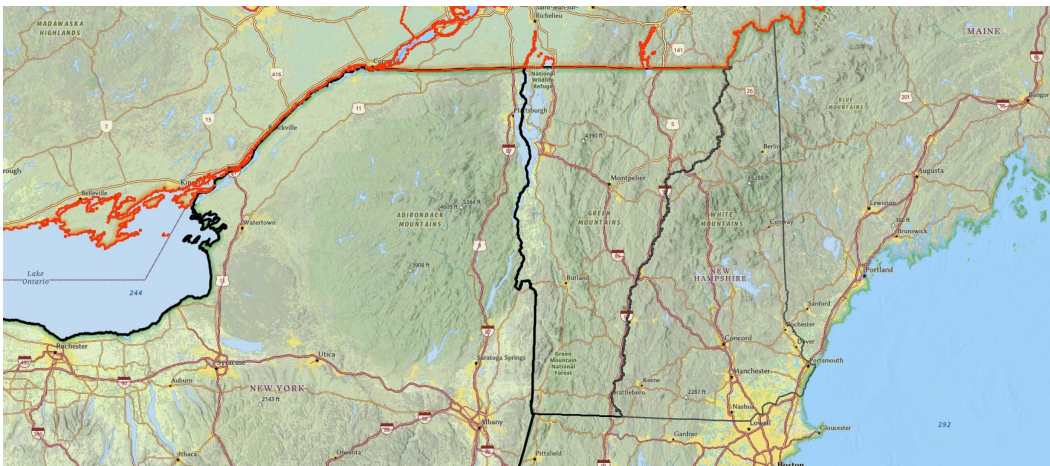
Case background:

The Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) and Homeland Security Investigations (HSI) are leading an investigation into a transnational criminal organization involved in international firearms smuggling originating in New Hampshire. ATF and HSI have been assisted, throughout this investigation, by various agencies including Customs and Border Protection (CBP), Keene Police Department, Ontario Provincial Police (OPP), Saint Regis Mohawk Tribal Police (SRMTP), Akwesasne Mohawk Police Service (AMPS), Manchester Police Department, and Sûreté du Québec. To date, ATF has identified fifty-one (51) firearms that have been straw purchased in New Hampshire and trafficked through Vermont and into New York State and/or Canada. The criminal organization traffics firearms through various Mohawk reservations with the ultimate destination ending in Canada. Co-conspirators Dustin Tuttle (25-cr-97-01-JL-TSM), Melissa Longe (26-cr-04-JL-TSM), and Justin Jackson (26-cr-00008-JL-TSM) have pled guilty to Conspiracy to Straw Purchase Firearms, in violation of 18 U.S.C. §§ 932(b)(2); Conspiracy to Traffic Firearms, in violation of 18 U.S.C. §§ 933(a)(1) and (3), and Sale of a Firearm in Furtherance of a Felony, in violation of 18 U.S.C. § 922(d)(10). Additionally, Justin Jackson pled guilty to prohibited person in possession of a firearm, in violation of 18 U.S.C. § 922(g)(9). Caleb Wilcott (26-cr-00022-JL-AJ) pled guilty to

false statement in connection with acquisition of a firearm, in violation of 18 U.S.C. § 922(a)(6), for his role in straw purchasing one firearm for Justin Jackson. Dustin Tuttle and Melissa Longe admitted to straw purchasing firearms for Justin Jackson so that he could sell them across state lines to members of the Akwesasne reservation.

The Smuggling Route

The border region near the Akwesasne is a known smuggling corridor. Below is a picture (Ex. 1) of the area utilized by smugglers.



Ex.1

The Akwesasne reservation contains territory that straddles the U.S. and Canadian territory. Within the Akwesasne reservation is Cornwall Island which is also inside of the Canadian border. The picture (Ex.2) below shows portions of the Akwesasne Reservation within New York state borders and Cornwall Island which is within Canadian borders.



(Ex. 2)

Drugs, guns, and people are smuggled through the Akwesasne reservation utilizing Cornwall Island which is part of the Akwesasne reservation.¹ Cornwall Island is also within the Canadian border. In 2009, Canada Border Services Agency (CBSA) removed a checkpoint from Cornwall Island over locals protesting armed CBSA officers on Akwesasne reservation land.² As a result, the CBSA checkpoint is now further inland within Canada. In 2021, CBSA introduced a dedicated “Domestic Lane” for residents and visitors of Cornwall Island to utilize. *Id.* The domestic lane was intended to facilitate the free flow of admissible goods and people resulting in quicker entries to and from Cornwall Island under the theory that there should be less scrutiny for domestic travelers who are commuting within Canada and have not entered through the U.S. side.³ Exhibit 3 details the where the crossings are located.

¹ Mark Bonokoski, “BONOKOSKI: Cornwall Island – the epicentre for moving human cargo and contraband tobacco,” *True North*, April 1, 2023, <https://tnc.news/2023/04/01/bonokoski-cornwall-island/>

² Annette Francis, “Dedicated Lanes and Training Improving Relations Between Mohawks, Border Guards in Akwesasne,” *APT News*, August 2, 2023, <https://www.aptnnews.ca/national-news/dedicated-lanes-and-training-improving-relations-between-mohawks-border-guards-in-akwesasne/>

³ “Pilot project eases border crossing at Massena Port of Entry,” *North Country Now*, March 14, 2024, <https://www.northcountrynow.com/stories/pilot-project-eases-border-crossing-at-massena-port-of-entry,228246>



Ex. 3

As depicted in Exhibit 3, the Canadian Border Crossing is within Canada but outside of the Akwesasne reservation territory of Cornwall Island. Pursuant to the Jay Treaty and corresponding legislation, Native Americans of the Akwesasne reservation may travel freely across the international boundary between the U.S. and Canada.⁴ This makes Cornwall Island a lucrative smuggling corridor.

First firearm trace

On or about August 30, 2024, a firearm was recovered by the Montreal City Police Department (SVPM) in Montreal, Quebec, on Joseph de Montenon Street as part of a search warrant executed on the residence in relation to a kidnapping investigation. SVPM recovered a Glock Pistol GMBH Model 26. The serial number was obliterated but restoration was successful and showed that it was BRZH077. This firearm was purchased by Dustin Tuttle at American

⁴ <https://ca.usembassy.gov/first-nations-and-native-americans/>

Trikes and Motorsports in Keene, NH, on October 20, 2023. The time-to-crime (TTC) was 201 days.

On September 5, 2024, HSI agents took custody of four (4) shell casings that were recovered from the Akwesasne Mohawk Police Service (AMPS). These cases were recovered from AMPS in Snye, Quebec on July 22, 2024. An individual (Suspect #1) was arrested for discharging a firearm at the scene where the four 9mm casings were recovered.

One of the shell casings was entered into ATF's National Integrated Ballistic Information Network ("NIBIN") system. ATF and HSI agents were notified of a NIBIN hit to Suspect #1. The NIBIN hit came from a casing submitted by the Saint Regis Mohawk Tribal Police (SRMTP) in relation to an event that occurred on or about July 29, 2024. On or about that date, SRMTP observed Suspect #1 driving a 2007 green Toyota Camry in the vicinity of Hogansburg/Akwesasne, N.Y. at 4:15pm. Suspect #1 had an active arrest warrant from SRMTP for firearm related charges. Suspect #1 fled and eventually abandoned his vehicle. SRMTP could not locate him but did find one 9mm shell casing in the vehicle which was entered into NIBIN.

That shell casing matched with the shell casing in the SVPM kidnapping investigation in Quebec, Canada.

On February 29, 2024, Suspect #1 was a passenger in a vehicle driven by Tayson Terrance ("Terrance") when they approached the Massena Port of Entry near Roosevelt town, New York at approximately 9:39pm. Suspect #1 presented his North American Indian identification card. HSI agents had placed an "armed and dangerous" secondary inspection alert on Suspect #1 because of the information regarding his role in suspected firearm trafficking activities. At approximately 9:40pm, he was removed from the vehicle by US Customs and

Border Protection (CBP) Officers when they viewed that alert. When Suspect #1 was removed from the vehicle, CBP Officers noticed a 3D printed lower frame for a pistol on the passenger seat. Suspect #1 was in the passenger seat prior to being removed. When CBP searched Suspect #1's person, they found metal components/parts of a firearm in his pockets.

Tayson Terrance was also removed from the vehicle, and he had a phone on his person. His phone was searched. During that search, investigators observed evidence of firearms and narcotics trafficking in various messages on the Signal messaging application.

ATF and HSI conduct interviews of co-conspirators

ATF and HSI agents have conducted several interviews of individuals involved in the firearm trafficking investigation. Those individuals have detailed how they utilize the Akwesasne reservation to cross between the U.S. and Canada as part of a smuggling network involved in human trafficking, firearms trafficking, human trafficking, and narcotics smuggling. Specifically, agents learned that one of the defendants utilize jets skis to smuggle contraband, including straw purchased firearms, from the New York portion of the Akwesasne to Cornwall Island. Once the contraband was on Cornwall Island, a resident would then ferry the contraband through the checkpoint and further into Canada. Through this investigation, the ATF and HSI learned that drugs, humans, and guns were trafficked to and from Canada utilizing Cornwall Island.

ATF agents continued to review text messages from various phones. Within these text messages, agents observed photographs wherein co-conspirators from the Akwesasne reservation were attempting to traffic firearms that were straw purchased by Justin Jackson, Melissa Longe, Dustin Tuttle, and Caleb Wilcott. For example, in one photograph investigators observed several serial numbers on firearms that Tayson Terrance was attempting to sell to different clients. Those

serial numbers were the following: LW 217520, TLN 51887, T6472-21, AEB081573, M46476, and NHC20018. ATF agents reviewed those serial numbers and determined that serial number TLN51887 (Taurus G2C 9 MM) was purchased on February 1st, 2024, by Melissa Longe (“Longe”). Serial numbers AEB081573 (Taurus G2C 9mm) and M46476 (Bersa BP9CC 9MM) were purchased on February 23rd, 2024, by Longe. All three (3) firearms were purchased by Longe at American Trikes & Motorsports, 223 Winchester ST, Keene, New Hampshire and agents discovered that she had purchased at least 31 firearms in New Hampshire since September 2023.

ATF and HSI agents have also obtained various text messages with pictures found on phones belonging to various co-conspirators as part of the investigation. These text messages depict straw-purchased firearms being trafficked to apparent Canadian purchasers. For example, a Signal chat between co-defendant Tayson Terrance and “Skully Meatmut” on or about February 19, 2024, showed a Ruger, Security, 380 cal. Pistol that Terrance sent to “Skully Meatmut.” Later, Terrance tells “Skully Meatmut” that he was, “in Hogan rn and ruger already gone.” Caleb Wilcott pled guilty on May 6, 2026, to straw purchasing that Ruger, Security 380, .380 cal., pistol, bearing SN: 386-92255 just four days prior on February 15, 2025. Justin Jackson told ATF agents that he brought this firearm to the Akwesasne reservation and traded it for a motorcycle. The picture (Ex. 4) of the text message depicting the firearm is below.



Ex. 4

Another photo shared between Terrance and co-defendant Conrad Oakes (“Oakes”) depicted several firearms that Terrance had smuggled to Oka, Quebec, Canada on or about February 28, 2024. In those text messages, Terrance described being robbed of the firearms by an individual in Canada. ATF was able to identify serial numbers on the firearms and was able to trace those firearms back to Justin Jackson’s straw purchasing crew. The photographs (Ex.5, 6, 7, 8) of the firearms are below:



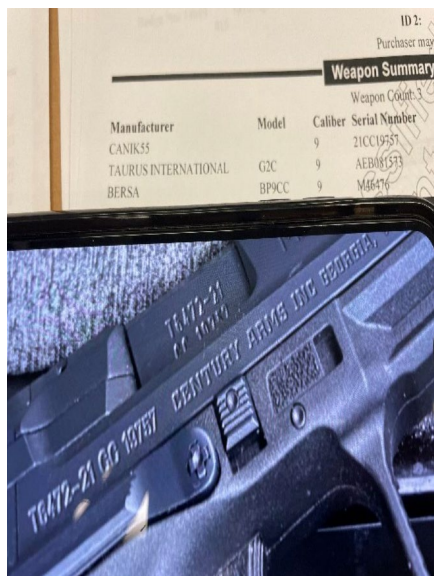
Ex. 5



Ex. 6



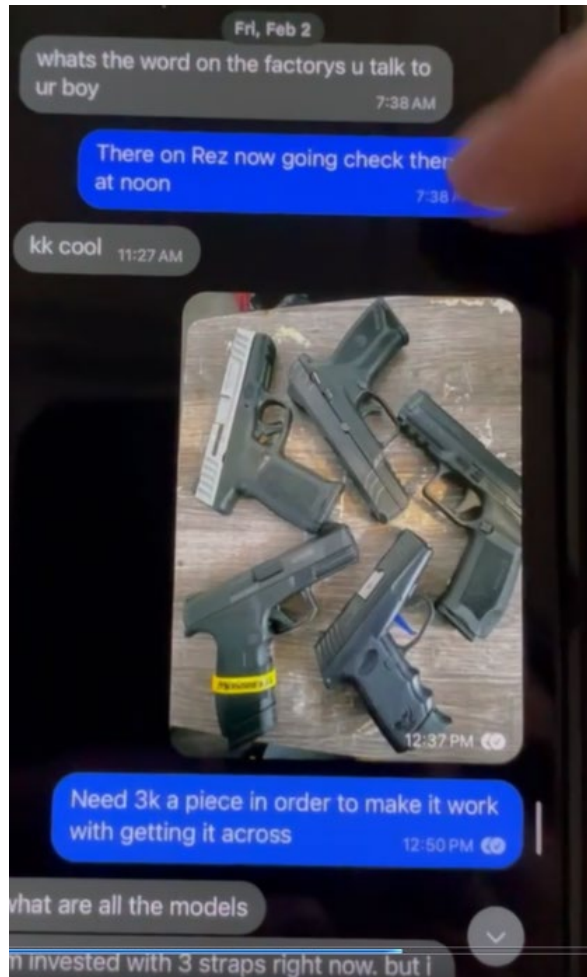
Ex. 7



Ex. 8

In at least one picture (Ex.9) found on co-conspirator Terrance's phone, he attempts to sell five firearms and mentions needing at least "3k a piece" in order to get "it across." This appears to be an attempt to sell five firearms for \$3,000 USC while utilizing the Cornwall Island route to traffic the firearms to Canada. Terrance further identifies them as a Mossberg Mc20, Smith and Wesson [sic] sd9, Canik TP9, Security 9, and Roebuck quad lock. These models described in the text match the five handguns sent in the photograph.

ATF agents reviewed paperwork that revealed that Longe purchased a Mossberg MC2C, a Smith and Wesson SD9, and a Canik55 TP- 9SF From Trader Johns Gun Shop, 600 Keene RD, Winchester, NH 03470 on February 1st, 2024. Longe purchased a Ruger Security 9 and a SCCY Industries DVG-1 (referred to as the Roebuck Quad Lock) on February 1st, 2024, from American Trikes & Motorsports. (The DVG-1 model has Roebuck Quad Lock imprinted on the firearm when purchased.) These purchases appeared to be the same firearms observed in the photograph Terrance sent on February 2, 2024, just one day later.



Ex. 9

ATF and HSI also interviewed the leader of the New Hampshire/Vermont area straw purchasers, Justin Jackson, who stated in sum and substance: That he knew he had a bad record but that he had a lot of expenses taking care of two households and believed that selling firearms would be a good way to make money because mechanics did not really make good money. He admitted to trafficking firearms to the Indian Reservation in New York near the border. He further stated that he was paid approximately \$200 in United States Currency for each gun if he could get other people to buy guns for the members of the Awkesasne Mohawk Indian Reservation (AMIR) located in New York. At the time, Justin Jackson was prohibited from possessing firearms under 18 U.S.C. § 922(g)(9) because he has been convicted of a

misdeemeanor crime of domestic violence, namely for the offense of Simple Assault, in the Cheshire County, 8th Circuit, District Division, Keene, New Hampshire, Case Number 449-2002-CR-02103, on May 14, 2002.

Montana COOK has been identified throughout the investigation as one of the primary gun traffickers. For example, ATF Special Agents Young Choi and Alec Ginther, and HSI SA Thomas Keenan, interviewed multiple cooperating co-conspirators who identified Ranonkwatseronhawi Gibson (“Gibson”), Conrad Oakes, Nash Oakes, Blade Oakes, Tayson Terrance, Io-Rateka Swamp, and Montana Cook as members of the Akwesasne reservation who helped traffic firearms during the conspiracy. Specifically, they identified Gibson as a driver of a black jaguar vehicle who drove on at least two separate occasions to Vermont, working with other gun traffickers from the Akwesasne reservation, to help buy, pick up, and transport firearms from Justin Jackson’s house in Vermont, back to New York State and Canada. They further informed agents that he was even stopped by police during one of his trips.

ATF and HSI agents were able to obtain four traffic tickets that Gibson received on January 31, 2024, and found bodycam from a New York State trooper that corroborated the co-conspirators’ account of what occurred. The bodycam depicts Gibson in the driver seat and a female in the passenger seat. The trooper obtains identification from the rear seat passenger which was the defendant, Montana Cook. The defendant is seen as he exited the vehicle to attempt to drive the car. The N.Y. State Trooper is then seen telling the defendant that he cannot drive because he has been drinking alcohol. Below are screenshots (Ex. 10, 11, 12) from the bodycam.



Ex. 10



Ex. 11



Ex. 12

ATF agents obtained ATF Form 4473s that show that Melissa Longe purchased seven (7) firearms from two separate firearms dealers in New Hampshire the following day. This is consistent with the co-conspirator accounts of Gibson, and the defendant Cook, traveling to Vermont to obtain straw-purchased firearms from Justin Jackson and Melissa Longe. Melissa Longe has since pled guilty to conspiring to straw-purchase and traffic those firearms to members of the Akwesasne reservation. The firearms are listed below:

2/1/2024	American Trikes & Motorsports	German Sports Guns, Firefly, .22 cal., pistol, SN: F515955 SCCY Industries, DVG-1, 9mm, pistol, SN: D005325 Taurus, G2C, 9mm, pistol, SN: TLN51887 Ruger, Security-9, 9mm, pistol, SN: 382- 00414
2/1/2024	Trader Johns Gun Shop	Mossberg, MC2C, 9mm, pistol, SN: 026699MC Smith & Wesson, SD9, 9mm, pistol, SN: EFC5821 Canik, TP-9SF, 9mm, pistol, SN: 22AT19109

Additionally, agents uncovered text messages between Terrance and Conrad Oakes that mention Montana Cook as being part of a group that went to Vermont to purchase firearms from Justin Jackson on or about January 24, 2024.

Firearm recoveries

Several of these firearms have been recovered at various Canadian crime scenes in the hands of members or suspected members of organized crime. The co-defendant, Melissa Longe, purchased six (7) firearms that were recovered as part of various criminal investigations in Canada.

One firearm, a Glock Model 28, .380 caliber semi-automatic pistol with serial number AHSR021, was recovered on January 16, 2025, as part of a criminal search warrant in Montreal, Quebec, Canada. That firearm was purchased by the co-defendant, Melissa Longe, on or about October 19, 2023, from Black Op Arms in Claremont, New Hampshire.

A second firearm, Smith & Wesson M&P Bodyguard 38, .38 Spl caliber revolver, with serial number CVW3838, was found discarded in a snowbank in Montreal, Quebec, Canada on

or about December 30, 2024. That firearm was purchased by the co-defendant, Melissa Longe, from American Trikes and Motorsports in Keene, New Hampshire, on or about September 28, 2023.

A third firearm, a FN Five-Seven, 5.7x28mm caliber semi-automatic pistole, with serial number 386423404, was recovered on or about December 18, 2024, as part of a criminal search warrant in Montreal, Quebec, Canada. That firearm had an obliterated serial number, but it was restored by the Laboratoire de Sciences judiciaires et de medicine legale (LSJML). It was purchased by the co-defendant, Melissa Longe, from Sporting and Hunting Depot, LLC, in Charlestown, New Hampshire on or about November 1, 2023.

A fourth firearm, a Glock Model 43, 9x19mm caliber semi-automatic pistol, with serial number AHLT557, was recovered during an abduction investigation on or about April 24, 2024, in Saguenay, Quebec, Canada. A fifth firearm, a Glock Model 19M, 9x19mm caliber semi-automatic pistol, with serial number AHVY161, was recovered on April 18, 2024, as part of the same abduction investigation in Saguenay, Quebec, Canada. Both firearms contained serial numbers that were obliterated but successfully restored by LSJML. Both firearms were purchased by the co-defendant, Melissa Longe, on or about October 19, 2023, from Black Op Arms in Claremont, New Hampshire.

Finally, the sixth firearm, a S.C. Nova Draco NAK-9, 9x19mm caliber semi-automatic pistol, with serial number RON22245780, was one of two firearms recovered on or about February 28, 2024, as part of a criminal investigation led by the Sûreté du Québec. The firearms were recovered in La Baie, Quebec, Canada, and were linked to members of the Blood Family Mafia (BFM). BFM is a criminal gang active in Quebec, Canada and notoriously violent. The

S.C. Nova Draco NAK-9 was purchased by the co-conspirator, Melissa Longe, on or about September 28, 2023, from American Trike and Motorsports, in Keene, New Hampshire.

On or about October 19, 2023, the co-defendant, Dustin Tuttle, purchased (1) a Glock, 17, 9mm, pistol, serial number (SN): BSHS739; (2) a Zastava, ZPAP 92, 7.62mm, pistol, SN: Z92-101899; and (3) a Tisas-Trabzon Gun Industry Corp, .45 cal, Pistol, SN: T0620-23Z13537, from the FFL Black Op Arms.

On or about October 20, 2023, the co-defendant, Dustin Tuttle, purchased a Glock 26, 9mm, piston, SN: BRZH077 from American Trikes & Motorsports.

On or about October 31, 2023, the co-defendant, Dustin Tuttle, purchased (1) a Smith & Wesson, Bodyguard, .380 cal, pistol, SN: KJH3188; and (2) a Colt Canada, MKIV, .45 cal, pistol, SN: RRD1226, from Trader Johns Gun Shop LLC.

On or about June 23, 2022, the co-defendant, Dustin Tuttle, purchased a SAR 9, 9mm pistol, SN: T11102-21BV95039, from American Trikes & Motorsports.

Finally, on or about December 16, 2022, the co-defendant, Dustin Tuttle, purchased a Colt, M1911A1, .45cal., pistol, SN: 2799591.

Two of these firearms were found at crime scenes in Canada. On or about August 30, 2024, a Glock Pistol GMBH Model 26, was found by the Montreal City Police Department in Montreal, Quebec, as part of a search warrant executed on a residence in relation to a kidnapping investigation. The serial number was obliterated but restored successfully and shown to be BRZH077. This firearm was purchased by a co-defendant, Dustin Tuttle, at American Trikes & Motorsports in Keene, New Hampshire, on or about October 20, 2023. The Glock 17 with serial number BSHS739 was recovered on or about November 27, 2024, in Chandley, Quebec, Canada.

On or about June 11, 2024, at approximately 7:10pm an individual parked an SUV behind a victim's vehicle in the parking lot of a business on Guy Street in Montreal. The individual fired several shots at the victim, missing every shot, before fleeing. Canadian law enforcement was able to find the discarded firearm on Notre-Dame Street West in Montreal. That firearm was a Smith & Wesson, M&P Bodyguard 380, 380 Auto, serial number EAJ9664 and was purchased by Melissa Longe from Trader Johns Gun Shop in Winchester, New Hampshire.

2. Weight of the Evidence

The weight of the evidence for the defendant's trafficking of the firearms is strong. There are multiple co-conspirators who identify the defendant as purchasing firearms to later traffic into Canada. Additionally, these accounts are corroborated by text messages and, on at least one occasion, bodycam video of the defendant traveling with Gibson to Vermont to purchase firearms from Justin Jackson and Melissa Longe.

3. History and Characteristics of the Defendant

The defendant has no criminal history. However, on the day of his arrest, agents observed that the defendant appeared to be under the influence of an unknown substance. Additionally, the defendant told agents that he was unemployed and did not reside in one stable location.

4. Danger to a Person or the Community

The defendant's participation in an international criminal trafficking organization that was responsible for the trafficking of approximately fifty-one firearms demonstrates his dangerousness and willful disregard for the law. The firearms have been found at various crime scenes in the U.S. and Canada. One of the crime scenes was an attempted murder in Montreal Canada, while another was discovered during a criminal kidnapping investigation in Canada. The

investigation is still ongoing and while 51 firearms have been identified so far, the true total number of firearms trafficked is unknown at this time.

D. Conclusion

For the reasons discussed herein, the government submits that pretrial detention is necessary to protect the community.

Dated: May 13, 2026

Respectfully submitted,

Erin Creegan
United States Attorney

By: /s/ Christopher Marin
Christopher Marin
Special Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been forwarded via ECF filing to all counsel of record.

/s/ Christopher Marin
Christopher Marin
Special Assistant United States Attorney