

Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington.

August 24 20 21  
Ray Subramanian, Clerk  
By Stefanie Pratt Deputy

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UNITED STATES OF AMERICA,  
Plaintiff

NO. **CR21-5290RJB**

INDICTMENT

v.

LYNN MANLEY CARGILE,  
Defendant.

The Grand Jury charges that:

COUNT 1

**(Felon in Possession of Firearms)**

On or about December 26, 2019, in Battle Ground, within the Western District of Washington, LYNN MANLEY CARGILE, knowing he had been convicted of the following crimes punishable by imprisonment for a term exceeding one year, namely:

*Attempting to Elude a Pursuing Police Vehicle* -- in Clark County Superior Court, Washington, under cause number 04-1-01012-8, dated on or about August 23, 2004;

*Attempting to Elude a Pursuing Police Vehicle* -- in Clark County Superior Court, Washington, under cause number 03-1-01350-1, dated on or about October 23, 2003;

1  
2 *Unlawful Possession of a Firearm in the Second Degree* – in Clark County  
3 Superior Court, Washington, under cause number 01-1-02022-6, dated on or about  
4 January 30, 2002; and

5 *Unlawful Possession of a Firearm in the Second Degree* – in Clark County  
6 Superior Court, Washington, under cause number 99-1-01614-9, dated on or about  
7 November 19, 1999;

8 did knowingly possess, in and affecting interstate and foreign commerce, the following  
9 firearms:

- 10 • a Smith and Wesson, model M&P15-22, .22 LR caliber rifle bearing serial number  
11 DFJ7209;
- 12 • a Black Rain Ordnance, model SPEC15, .223 REM caliber rifle bearing serial  
13 number SP002588;

14 each of which had been shipped and transported in interstate and foreign commerce.

15 All in violation of Title 18, United States Code, Section 922(g)(1) and 924(a)(2).

16 **COUNT 2**

17 **(Possession of Unregistered Firearms)**

18 On or about December 26, 2019, in Battle Ground, within the Western District of  
19 Washington, LYNN MANLEY CARGILE knowingly possessed a firearm which was not  
20 registered to him in the National Firearms Registration and Transfer Record, as required  
21 by law, namely:

- 22 • a Black Rain Ordnance, model SPEC15, .223 REM caliber rifle bearing serial  
23 number SP002588 with a 7-1/8 inch barrel, a rifle having a barrel of less than 16  
24 inches;
- 25 • a cylindrical firearm silencer, black in color, made from a non-ferrous metal, with  
26 metallic tape around the exterior, measuring approximately 9-3/4 inches in total  
27 length, and approximately 2 inches in diameter, without a serial number or other  
28 identifying manufacturer marking, that silences, muffles or diminishes the report of  
a portable firearm; and

- a cylindrical firearm silencer, black in color, made from a non-ferrous metal, measuring approximately 6 inches in total length, and approximately 1 inch in diameter, without a serial number or other identifying manufacturer marking, that silences, muffles or diminishes the report of a portable firearm.

All in violation of Title 26, United States Code, Sections 5861(d).

**ASSET FORFEITURE ALLEGATION**

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

Upon conviction of either of the offenses charged in Counts 1 and 2, the defendant LYNN MANLEY CARGILE shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), by way of Title 28, United States Code, Section 2461(c), any firearms or ammunition involved in the offense.

**Substitute Assets.** If any of the above-described forfeitable property, as a result of any act or omission of the Defendant,

1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with a third party;
3. has been placed beyond the jurisdiction of the Court;
4. has been substantially diminished in value; or,
5. has been commingled with other property which cannot be divided without difficulty;

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1 it is the intent of the United States, pursuant to Title 21, United States Code, Section  
2 853(p), to seek the forfeiture of any other property of the Defendant up to the value of the  
3 above-described forfeitable property.  
4

5 A TRUE BILL:

6  
7 DATED: 25 Aug 2021  
8

9 *Signature of foreperson redacted*  
10 *pursuant to the policy of the Judicial*  
11 *Conference of the United States*

12 \_\_\_\_\_  
13 FOREPERSON

14 \_\_\_\_\_  
15 TESSA M. GORMAN  
16 Acting United States Attorney

17 \_\_\_\_\_  
18 TODD GREENBERG  
19 Assistant United States Attorney

20 \_\_\_\_\_  
21 *Rm S Cone*  
22 ANGELICA WILLIAMS  
23 Assistant United States Attorney