

United States District Court
FOR THE NORTHERN DISTRICT OF CALIFORNIA
VENUE: SAN FRANCISCO

FILED
2013 JAN -8 P 3:25
HONORABLE J. WICKING
CLERK OF DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
v.

CR 13 006

TERRY JACKSEN et al.,

WHA

DEFENDANT(S).

INDICTMENT

VIOLATIONS: 18 U.S.C. § 1951 – Hobbs Act Robbery/Conspiracy; 21 U.S.C. 846 – Drug Conspiracy; 18 U.S.C. § 924(c) – Use/Possession of Firearm in Furtherance of Crime of Violence; 18 U.S.C. § 912 – Impersonating an Officer; 18 U.S.C. § 913 – Impersonator Making Search; 21 U.S.C. 841(a)(1) – Possession with Intent to Distribute Controlled Substance; 18 U.S.C. § 922(g) – Felon in Possession of Firearm; 18 U.S.C. § 2 – Aiding and Abetting; 18 U.S.C. §§ 924(d) and 981(a)(1)(C) – Robbery Forfeiture; 21 U.S.C. § 853(a) – Drug Forfeiture.

A true bill.

J. Schen
Foreman

Filed in open court this 8 day of Jan 2013

K. Scott
Clerk

CR
Bail, \$ no bail arrest warrant for Michael Puckett
no process for the other defend-ly

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

See Attachment A (Defendant Information Sheet)

- Petty
- Minor
- Misdemeanor
- Felony

PENALTY: See Attachment A

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

2013 JAN -8 P 3:25
SAN FRANCISCO DIVISION

DEFENDANT - U.S. COURT

TERRY JACKSEN

DISTRICT COURT NUMBER

TB **CR 13**

WHA 006

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

FBI SA VIVIEN MOON

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

this is a re prosecution of charges previously dismissed which were dismissed on motion of:

U.S. ATTORNEY DEFENSE

SHOW DOCKET NO.

this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

3:12-71335-MAG

Name and Office of Person

Furnishing Information on this form MELINDA HAAG

U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned)

Asst U.S. Atty Randy S. Luskey

This report amends AO 257 previously submitted

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

- 1) If not detained give date any prior summons was served on above charges
- 2) Is a Fugitive
- 3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
 - 5) On another conviction } Federal State
 - 6) Awaiting trial on other charges
- If answer to (6) is "Yes", show name of institution

Has detainer been filed? Yes No

If "Yes" give date filed

DATE OF ARREST Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY Month/Day/Year

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT

Bail Amount: _____

If Summons, complete following:

Arraignment Initial Appearance

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

Date/Time: _____ Before Judge: _____

Comments:

United States v. Terry Jacksen, et al
Defendant Information Sheet
Attachment A

(1) TERRY JACKSEN

COUNT 1: 18 U.S.C. § 1951(a) — Conspiracy to Commit Robbery Affecting Interstate Commerce

Maximum term of 20 years imprisonment

Maximum term of 3 years supervised release

Maximum fine of the greatest of either: (a) \$250,000; (b) twice the gross pecuniary gain to the defendant; or (c) twice the gross pecuniary loss inflicted on another

Mandatory special assessment of \$100

COUNT 2: 18 U.S.C. §§ 1951(a) and 2 — Robbery Affecting Interstate Commerce

Maximum term of 20 years imprisonment

Maximum term of 3 years supervised release

Maximum fine of the greatest of either: (a) \$250,000; (b) twice the gross pecuniary gain to the defendant; or (c) twice the gross pecuniary loss inflicted on another

Mandatory special assessment of \$100

COUNT 3: 21 U.S.C. § 846 – Conspiracy to Distribute/Possess with Intent to Distribute a Controlled Substance

Maximum term of 5 years imprisonment

Maximum term of 2 years supervised release

Maximum fine of \$250,000

Mandatory special assessment of \$100

COUNT 4: 18 U.S.C. §§ 924(c) and 2 – Possession of a Firearm in Furtherance of a Crime of Violence

Maximum term of life imprisonment

Mandatory minimum term of 5 (if firearm possessed) or 7 (if brandished) years, to be imposed consecutive to any other term of imprisonment

Maximum term of supervised release of 5 years

Maximum fine of the greatest of either: (a) \$250,000; (b) twice the gross pecuniary gain to the defendant; or (c) twice the gross pecuniary loss inflicted on another

Mandatory special assessment of \$100

COUNT 5 : 18 U.S.C. §§ 1912 and 2 – Impersonating an Officer

Maximum term of 3 years imprisonment

Maximum term of supervised release of 3 years

Maximum fine of the greatest of either: (a) \$250,000; (b) twice the gross pecuniary gain to the defendant; or (c) twice the gross pecuniary loss inflicted on another
Mandatory special assessment of \$100

COUNT 6 : 18 U.S.C. §§ 1913 and 2 – Impersonator Making Search

Maximum term of 3 years imprisonment

Maximum term of supervised release of 3 years

Maximum fine of the greatest of either: (a) \$250,000; (b) twice the gross pecuniary gain to the defendant; or (c) twice the gross pecuniary loss inflicted on another

Mandatory special assessment of \$100

COUNT 7 : 18 U.S.C. § 922(g) — Felon in Possession of Firearm and Ammunition

Maximum term of 10 years' imprisonment

Maximum term of 3 years' supervised release

Maximum fine of: \$250,000

Mandatory special assessment of \$100

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT

Name of District Court, and/or Judge/Magistrate Location

FILED

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

OFFENSE CHARGED

See Attachment A (Defendant Information Sheet)

- Petty
- Minor
- Misdemeanor
- Felony

PENALTY: See Attachment A

DEFENDANT U.S.

ERIC MENDONCA

WHA

DISTRICT COURT NUMBER

TBD CR 13

006

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

FBI SA VIVIEN MOON

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

this is a re prosecution of charges previously dismissed which were dismissed on motion of:

U.S. ATTORNEY DEFENSE

SHOW DOCKET NO.

this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

3:12-71335-MAG

Name and Office of Person

Furnishing Information on this form MELINDA HAAG

U.S. Attorney Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned) Asst U.S. Atty Randy S. Luskey

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

- 1) If not detained give date any prior summons was served on above charges
- 2) Is a Fugitive
- 3) Is on Bail or Release from (show District)

NDCAL

IS IN CUSTODY

- 4) On this charge
 - 5) On another conviction } Federal State
 - 6) Awaiting trial on other charges
- If answer to (6) is "Yes", show name of institution

Has detainer been filed? Yes No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT

Bail Amount: _____

If Summons, complete following:

Arraignment Initial Appearance

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

Date/Time: _____ Before Judge: _____

Comments:

(2) **ERIC MENDONCA**

COUNT 1: 18 U.S.C. § 1951(a) — Conspiracy to Commit Robbery Affecting Interstate Commerce

Maximum term of 20 years imprisonment

Maximum term of 3 years supervised release

Maximum fine of the greatest of either: (a) \$250,000; (b) twice the gross pecuniary gain to the defendant; or (c) twice the gross pecuniary loss inflicted on another

Mandatory special assessment of \$100

COUNT 2: 18 U.S.C. §§ 1951(a) and 2 — Robbery Affecting Interstate Commerce

Maximum term of 20 years imprisonment

Maximum term of 3 years supervised release

Maximum fine of the greatest of either: (a) \$250,000; (b) twice the gross pecuniary gain to the defendant; or (c) twice the gross pecuniary loss inflicted on another

Mandatory special assessment of \$100

COUNT 3: 21 U.S.C. § 846 – Conspiracy to Distribute/Possess with Intent to Distribute a Controlled Substance

Maximum term of 5 years imprisonment

Maximum term of 2 years supervised release

Maximum fine of \$250,000

Mandatory special assessment of \$100

COUNT 4: 18 U.S.C. §§ 924(c) and 2 – Possession of a Firearm in Furtherance of a Crime of Violence

Maximum term of life imprisonment

Mandatory minimum term of 5 (if firearm possessed) or 7 (if brandished) years, to be imposed consecutive to any other term of imprisonment

Maximum term of supervised release of 5 years

Maximum fine of the greatest of either: (a) \$250,000; (b) twice the gross pecuniary gain to the defendant; or (c) twice the gross pecuniary loss inflicted on another

Mandatory special assessment of \$100

COUNT 5 : 18 U.S.C. §§ 1912 and 2 – Impersonating an Officer

Maximum term of 3 years imprisonment

Maximum term of supervised release of 3 years

Maximum fine of the greatest of either: (a) \$250,000; (b) twice the gross pecuniary gain to the defendant; or (c) twice the gross pecuniary loss inflicted on another

Mandatory special assessment of \$100

COUNT 6 : 18 U.S.C. §§ 1913 and 2 – Impersonator Making Search

Maximum term of 3 years imprisonment

Maximum term of supervised release of 3 years

Maximum fine of the greatest of either: (a) \$250,000; (b) twice the gross pecuniary gain to the defendant; or (c) twice the gross pecuniary loss inflicted on another
Mandatory special assessment of \$100

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

See Attachment A (Defendant Information Sheet)

- Petty
- Minor
- Misdemeanor
- Felony

PENALTY: See Attachment A

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

2013 JAN -8 P 3:26

DEFENDANT - U.S.

JACK DAVID POLLACK

DISTRICT COURT NUMBER

TBD

CR 13

WHA 006

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

FBI SA VIVIEN MOON

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

this is a re prosecution of charges previously dismissed which were dismissed on motion of:

U.S. ATTORNEY DEFENSE

SHOW DOCKET NO.

this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

3:12-71335-MAG

Name and Office of Person

Furnishing Information on this form **MELINDA HAAG**

U.S. Attorney Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned) **Asst U.S. Atty Randy S. Luskey**

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

- 1) If not detained give date any prior summons was served on above charges
- 2) Is a Fugitive
- 3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
 - 5) On another conviction } Federal State
 - 6) Awaiting trial on other charges
- If answer to (6) is "Yes", show name of institution

Has detainer been filed? Yes No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT

Bail Amount: _____

If Summons, complete following:

Arraignment Initial Appearance

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

Date/Time: _____ Before Judge: _____

Comments:

(3) **JACK POLLACK**

COUNT 1: 18 U.S.C. § 1951(a) — Conspiracy to Commit Robbery Affecting Interstate Commerce

Maximum term of 20 years imprisonment

Maximum term of 3 years supervised release

Maximum fine of the greatest of either: (a) \$250,000; (b) twice the gross pecuniary gain to the defendant; or (c) twice the gross pecuniary loss inflicted on another

Mandatory special assessment of \$100

COUNT 2: 18 U.S.C. §§ 1951(a) and 2 — Robbery Affecting Interstate Commerce

Maximum term of 20 years imprisonment

Maximum term of 3 years supervised release

Maximum fine of the greatest of either: (a) \$250,000; (b) twice the gross pecuniary gain to the defendant; or (c) twice the gross pecuniary loss inflicted on another

Mandatory special assessment of \$100

COUNT 3: 21 U.S.C. § 846 – Conspiracy to Distribute/Possess with Intent to Distribute a Controlled Substance

Maximum term of 5 years imprisonment

Maximum term of 2 years supervised release

Maximum fine of \$250,000

Mandatory special assessment of \$100

COUNT 4: 18 U.S.C. §§ 924(c) and 2 – Possession of a Firearm in Furtherance of a Crime of Violence

Maximum term of life imprisonment

Mandatory minimum term of 5 (if firearm possessed) or 7 (if brandished) years, to be imposed consecutive to any other term of imprisonment

Maximum term of supervised release of 5 years

Maximum fine of the greatest of either: (a) \$250,000; (b) twice the gross pecuniary gain to the defendant; or (c) twice the gross pecuniary loss inflicted on another

Mandatory special assessment of \$100

COUNT 5 : 18 U.S.C. §§ 1912 and 2 – Impersonating an Officer

Maximum term of 3 years imprisonment

Maximum term of supervised release of 3 years

Maximum fine of the greatest of either: (a) \$250,000; (b) twice the gross pecuniary gain to the defendant; or (c) twice the gross pecuniary loss inflicted on another

Mandatory special assessment of \$100

COUNT 6 : 18 U.S.C. §§ 1913 and 2 – Impersonator Making Search

Maximum term of 3 years imprisonment

Maximum term of supervised release of 3 years

Maximum fine of the greatest of either: (a) \$250,000; (b) twice the gross pecuniary gain to the defendant; or (c) twice the gross pecuniary loss inflicted on another
Mandatory special assessment of \$100

COUNT 8: 18 U.S.C. §§ 922(g) — Felon in Possession of Firearm

Maximum term of 10 years' imprisonment

Maximum term of 3 years' supervised release

Maximum fine of: \$250,000

Mandatory special assessment of \$100

COUNT 9: 21 U.S.C. § 841(a) and (b)(1)(B)— Possession with Intent to Distribute Controlled Substance (over five grams of methamphetamine)

Maximum term of 40 years imprisonment

Minimum term of 5 years imprisonment

Maximum term of 5 years supervised release

Maximum fine of: \$1,000,000

Mandatory special assessment of \$100

COUNT 10: 21 U.S.C. § 841(a) and (b)(1)(D)— Possession with Intent to Distribute Controlled Substance (marijuana)

Maximum term of 5 years imprisonment

Maximum term of 2 years supervised release

Maximum fine of: \$250,000

Mandatory special assessment of \$100

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

See Attachment A (Defendant Information Sheet)

- Petty
- Minor
- Misdemeanor
- Felony

PENALTY: See Attachment A

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

2013 JAN - SAN FRANCISCO DIVISION

DEFENDANT - U.S. DISTRICT COURT

MICHAEL PUCKETT

DISTRICT COURT NUMBER

TBD CR 13 006

WHA

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

FBI SA VIVIEN MOON

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

this is a re prosecution of charges previously dismissed which were dismissed on motion of:

U.S. ATTORNEY DEFENSE

SHOW DOCKET NO.

this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form MELINDA HAAG

U.S. Attorney Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned) Asst U.S. Atty Randy S. Luskey

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

- 1) If not detained give date any prior summons was served on above charges
- 2) Is a Fugitive
- 3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
 - 5) On another conviction } Federal State
 - 6) Awaiting trial on other charges
- If answer to (6) is "Yes", show name of institution

Has detainer been filed? Yes No

If "Yes" give date filed

DATE OF ARREST Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY Month/Day/Year

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT

Bail Amount: NO BAIL

If Summons, complete following:

Arraignment Initial Appearance

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

Date/Time: Before Judge:

Comments:

(4) **MICHAEL PUCKETT**

COUNT 1: 18 U.S.C. § 1951(a) — Conspiracy to Commit Robbery Affecting Interstate Commerce

Maximum term of 20 years imprisonment

Maximum term of 3 years supervised release

Maximum fine of the greatest of either: (a) \$250,000; (b) twice the gross pecuniary gain to the defendant; or (c) twice the gross pecuniary loss inflicted on another

Mandatory special assessment of \$100

COUNT 2: 18 U.S.C. §§ 1951(a) and 2 — Robbery Affecting Interstate Commerce

Maximum term of 20 years imprisonment

Maximum term of 3 years supervised release

Maximum fine of the greatest of either: (a) \$250,000; (b) twice the gross pecuniary gain to the defendant; or (c) twice the gross pecuniary loss inflicted on another

Mandatory special assessment of \$100

COUNT 3: 21 U.S.C. § 846 – Conspiracy to Distribute/Possess with Intent to Distribute a Controlled Substance

Maximum term of 5 years imprisonment

Maximum term of 2 years supervised release

Maximum fine of \$250,000

Mandatory special assessment of \$100

COUNT 4: 18 U.S.C. §§ 924(c) and 2 – Possession of a Firearm in Furtherance of a Crime of Violence

Maximum term of life imprisonment

Mandatory minimum term of 5 (if firearm possessed) or 7 (if brandished) years, to be imposed consecutive to any other term of imprisonment

Maximum term of supervised release of 5 years

Maximum fine of the greatest of either: (a) \$250,000; (b) twice the gross pecuniary gain to the defendant; or (c) twice the gross pecuniary loss inflicted on another

Mandatory special assessment of \$100

COUNT 5 : 18 U.S.C. §§ 1912 and 2 – Impersonating an Officer

Maximum term of 3 years imprisonment

Maximum term of supervised release of 3 years

Maximum fine of the greatest of either: (a) \$250,000; (b) twice the gross pecuniary gain to the defendant; or (c) twice the gross pecuniary loss inflicted on another

Mandatory special assessment of \$100

COUNT 6 : 18 U.S.C. §§ 1913 and 2 – Impersonator Making Search

Maximum term of 3 years imprisonment

Maximum term of supervised release of 3 years

Maximum fine of the greatest of either: (a) \$250,000; (b) twice the gross pecuniary gain to the defendant; or (c) twice the gross pecuniary loss inflicted on another
Mandatory special assessment of \$100

1 MELINDA HAAG (CABN 132612)
United States Attorney

FILED

2013 JAN -8 P 3:25

RICHARD A. WIERING
CLERK OF DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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5
6
7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA
9 SAN FRANCISCO DIVISION

WHA

10
11 UNITED STATES OF AMERICA,)

No.

CR 13

006

12 v.)

13 TERRY JACKSEN,)
14 ERIC MENDONCA,)
15 JACK POLLACK,)
MICHAEL PUCKETT,)

16 Defendants.)

VIOLATIONS: 18 U.S.C. § 1951 – Hobbs Act Robbery/Conspiracy; 21 U.S.C. 846 – Drug Conspiracy; 18 U.S.C. § 924(c) – Use/Possession of Firearm in Furtherance of Crime of Violence; 18 U.S.C. § 912 – Impersonating an Officer; 18 U.S.C. § 913 – Impersonator Making Search; 21 U.S.C. 841(a)(1) – Possession with Intent to Distribute Controlled Substance; 18 U.S.C. § 922(g) – Felon in Possession of Firearm; 18 U.S.C. § 2 – Aiding and Abetting; 18 U.S.C. §§ 924(d) and 981(a)(1)(C) – Robbery Forfeiture; 21 U.S.C. § 853(a) – Drug Forfeiture.

17)
18)
19)
20)
21)
SAN FRANCISCO VENUE

22
23 INDICTMENT

24 The Grand Jury charges:

25 COUNT ONE: (18 U.S.C. § 1951(a) — Conspiracy to Commit Robbery Affecting
26 Interstate Commerce)

27 1. From at least in or about September 2012 up through and including in or about
28 November 2012, in the Northern District of California, the defendants,

1
2 TERRY JACKSEN,
3 ERIC MENDONCA,
4 JACK POLLACK, and
5 MICHAEL PUCKETT,

6 and others known and unknown, unlawfully, willfully, and intentionally did combine, conspire,
7 confederate, and agree together and with each other to commit robbery, as that term is defined in
8 Title 18, United States Code, Section 1951(b)(1), and thereby would obstruct, delay, and affect
9 commerce and the movement of articles and commodities in commerce.

10 All in violation of Title 18, United States Code, Section 1951(a).

11 COUNT TWO: (18 U.S.C. §§ 1951(a) and 2 — Robbery Affecting Interstate Commerce)

12 2. On or about October 4, 2012, in the Northern District of California, the
13 defendants,

14 TERRY JACKSEN,
15 ERIC MENDONCA,
16 JACK POLLACK, and
17 MICHAEL PUCKETT,

18 and others known and unknown, unlawfully and knowingly did obstruct, delay, and affect
19 commerce and the movement of articles and commodities in commerce by robbery, as that term
20 is defined in Title 18, United States Code, Section 1951(b)(1).

21 All in violation of Title 18, United States Code, Sections 1951(a) and 2.

22 COUNT THREE: (21 U.S.C. § 846 — Conspiracy to Distribute/Possess with Intent to
23 Distribute a Controlled Substance)

24 3. From at least in or about October 2012 up through and including in or about
25 December 2012, in the Northern District of California, the defendants,

26 TERRY JACKSEN,
27 ERIC MENDONCA,
28 JACK POLLACK, and

1 MICHAEL PUCKETT,

2 and others known and unknown, unlawfully, willfully, and intentionally did conspire to distribute
3 and possess with intent to distribute mixtures and substances containing a detectable amount of
4 marijuana.

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

7 COUNT FOUR: (18 U.S.C. §§ 924(c) and 2 — Use/Possession of a Firearm in Furtherance
8 of a Crime of Violence and a Drug Trafficking Crime)

9 4. On or about October 4, 2012, in the Northern District of California, the
10 defendants,

11 TERRY JACKSEN,

12 ERIC MENDONCA,

13 JACK POLLACK, and

14 MICHAEL PUCKETT,

15 and others known and unknown to the grand jury, unlawfully and knowingly did use and carry a
16 firearm during and in relation to a crime of violence and a drug trafficking crime for which they
17 may be prosecuted in a court of the United States, namely, the conspiracy to commit robbery
18 affecting commerce charged in Count One of this Indictment, the robbery affecting commerce
19 charged in Count Two of this Indictment, and the conspiracy to distribute and to possess with the
20 intent to distribute a controlled substance charged in Count Three of this Indictment, and did
21 possess and brandish a firearm in furtherance of the offenses charged in Counts One, Two and
22 Three of this Indictment.

23 All in violation of Title 18, United States Code, Sections 924(c) and 2.

24 COUNT FIVE: (18 U.S.C. §§ 912 and 2 — False Personation of an Officer of the United
25 States)

26 5. On or about October 4, 2012, in the Northern District of California, the
27 defendants,

28 TERRY JACKSEN,

INDICTMENT

1 ERIC MENDONCA,
2 JACK POLLACK, and
3 MICHAEL PUCKETT,

4 and others known and unknown, did falsely assume and pretend to be an officer and employee
5 acting under the authority of the United States and a department, agency, and officer thereof, and
6 act as such, and in such pretended character did demand and obtain money, paper, document, and
7 thing of value.

8 All in violation of Title 18, United States Code, Sections 912 and 2

9 COUNT SIX: (18 U.S.C. §§ 913 and 2 — Impersonator Making Search)

10 6. On or about October 4, 2012, in the Northern District of California, the
11 defendants,

12 TERRY JACKSEN,
13 ERIC MENDONCA,
14 JACK POLLACK, and
15 MICHAEL PUCKETT,

16 and others known and unknown, did falsely represent themselves to be an officer, agent, and
17 employee of the United States, and, in such assumed character, arrest and detain a person, and, in
18 any manner, search a person, building, and other property of a person.

19 All in violation of Title 18, United States Code, Sections 913 and 2.

20 COUNT SEVEN: (18 U.S.C. §§ 922(g) — Felon in Possession of Firearm)

21 7. On or about December 19, 2012, in the Northern District of California, the
22 defendant,

23 TERRY JACKSEN,

24 having been previously convicted of a crime punishable by a term of imprisonment exceeding
25 one year, unlawfully and knowingly did possess a firearm, specifically, a Winchester magnum
26 .22 caliber rifle bearing serial number F491482, a Savage Model 3 3.06 caliber rifle bearing
27 serial number F849944, a Remington Model 870 shotgun bearing serial number W536799M, and
28 a Burgo .22 caliber revolver bearing serial number 66555, in and affecting interstate commerce.

INDICTMENT

1 All in violation of Title 18, United States Code, Sections 922(g)(1).

2 COUNT EIGHT: (18 U.S.C. §§ 922(g) — Felon in Possession of Firearm)

3 8. On or about November 9, 2012, in the Northern District of California, the
4 defendant,

5 JACK DAVID POLLACK,

6 having been previously convicted of a crime punishable by a term of imprisonment exceeding
7 one year, unlawfully and knowingly did possess a firearm, specifically a Savage Model 99 rifle
8 bearing serial number 726386, in and affecting interstate commerce.

9 All in violation of Title 18, United States Code, Sections 922(g)(1).

10 COUNT NINE: (21 U.S.C. §§ 841(a) — Possession with Intent to Distribute Controlled
11 Substance)

12 9. On or about November 9, 2012, in the Northern District of California, the
13 defendant,

14 JACK DAVID POLLACK

15 unlawfully and knowingly did possess with the intent to distribute five grams or more of
16 methamphetamine, its salts, isomers, and salts of its isomers.

17 All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B)(viii).

18 COUNT TEN: (21 U.S.C. §§ 841(a) — Possession with Intent to Distribute Controlled
19 Substance)

20 10. On or around December 19, 2012, in the Northern District of California, the
21 defendant,

22 JACK DAVID POLLACK,

23 unlawfully and knowingly did possess with the intent to distribute mixtures and substances
24 containing a detectable amount of marijuana.

25 All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

26 FIRST FORFEITURE ALLEGATION: (18 U.S.C. §§ 924(d) and 981(a)(1)(c) —
27 Robbery and Firearm Forfeiture)

28 11. The allegations contained in this Indictment are re-alleged and by this reference

1 fully incorporated herein for the purpose of alleging forfeiture pursuant to the provisions of 18
2 U.S.C. §§ 924(d), 981(a)(1)(C) and 28 U.S.C. § 2461(c).

3 12. Upon a conviction for Counts One, Two, or Four, alleged above, the defendants,

4 TERRY JACKSEN,

5 ERIC MENDONCA,

6 JACK DAVID POLLACK, and

7 MICHAEL PUCKETT,

8 shall forfeit to the United States: (1) any property, real or personal, which constitutes or is
9 derived from proceeds traceable to said offense, and (2) any firearms or ammunition intended to
10 be used in said offense, including but not limited to:

- 11 a. a Winchester magnum .22 caliber rifle bearing serial number F491482,
12 b. a Savage Model 3 3.06 caliber rifle bearing serial number F849944,
13 c. a Burgo .22 caliber revolver bearing serial number 66555,
14 d. a Savage Model 99 rifle bearing serial number 726386, and
15 e. a Remington Model 870 shotgun bearing serial number W536799M.

16 If, as a result of any act or omission of the defendant, any of said property

- 17 a. cannot be located upon the exercise of due diligence;
18 b. has been transferred or sold to or deposited with, a third person;
19 c. has been placed beyond the jurisdiction of the Court;
20 d. has been substantially diminished in value; or
21 e. has been commingled with other property which cannot be divided without
22 difficulty;

23 any and all interest the defendant has in other property shall be vested in the United States and
24 forfeited to the United States pursuant to 21 U.S.C. § 853(p) and 28 U.S.C. § 2461.

25 All pursuant to 18 U.S.C. §§ 922(g), 924(d), 981(a)(1)(C); 28 U.S.C. § 2461(c); and Rule
26 32.2 of the Federal Rules of Criminal Procedure.

27 SECOND FORFEITURE ALLEGATION: (21 U.S.C. § 853(a)(2) — Drug Forfeiture)

28 13. The allegations contained in Counts Three, Nine and Ten of this Indictment are

1 realleged and incorporated herein.

2 14. Upon a conviction for the offense alleged in Counts Three, Nine or Ten above,
3 defendants,

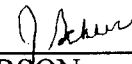
4 TERRY JACKSEN,
5 ERIC MENDONCA,
6 JACK DAVID POLLACK, and
7 MICHAEL PUCKETT,

8 shall forfeit to the United States any property used or intended to be used, in any manner or part,
9 to commit, or facilitate the commission of a violation of Title 21, United States Code, Section
10 841(a), including but not limited to any firearm or ammunition involved in said offense.

11 All in violation of Title 21, United States Code, Section 853(a)(2).

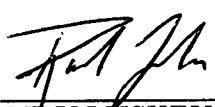
12
13 DATED: January 8, 2013

A TRUE BILL

14
15 
16 _____
FOREPERSON

17 MELINDA HAAG
18 United States Attorney

19 
20 _____
21 MIRANDA KANE
Chief, Criminal Division

22 
23 (Approved as to form: _____)
24 RANDY LUSKEY
Assistant United States Attorney

United States District Court
Northern District of California

FILED

2013 JAN 8 12 3 26

CRIMINAL COVER SHEET

BRIGID B. W. STEINING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Instructions: Effective January 3, 2012, this Criminal Cover Sheet must be completed and submitted, along with the Defendant Information Form, for each new criminal case. Please place this form on top of the Defendant Information Form.

WHA

Case Name:

USA v. TERRY JACKSEN et al.,

Case Number:

CR 13 006

Total Number of Defendants:

1 _____ 2-7 8 or more _____

Is This Case Under Seal?

Yes _____ No

Does this case involve ONLY charges under 8 U.S.C. § 1325 and/or 1326?

Yes _____ No

Venue (Per Crim. L.R. 18-1):

SF OAK _____ SJ _____

Is this a death-penalty-eligible RICO Act gang case?

Yes _____ No

Assigned AUSA (Lead Attorney):

RANDY LUSKEY

Comments:

[Empty box for comments]

Date Submitted:

January 8, 2012

