

**SEALED**

CLERK US DISTRICT COURT  
NORTHERN DIST. OF TX  
FILED

ORIGINAL

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

2014 OCT -8 AM 11:43

DEPUTY CLERK

NT

UNITED STATES OF AMERICA

v.

GEORGE PASS,  
aka "Tennessee" (1)

RHONDA LONG,  
aka "Queen Saltine" (2)

BRANDON CROW (3)

NIA REED (4)

JOHN CARL HALL,  
aka "Scooter" (5)

CESAR ZARATE (6)

AARON REYES,  
aka "Mike" (7)

SARAH WEST (8)

BRADLEY WILTCHER (9)

MICHAEL BASS,  
aka "Sleepy" (10)

PATRICK PENNEY,  
aka "Pacman" (11)

CLIFTON CLOWERS (12)

MICHAEL MCCOY,  
aka "Bam Bam" (13)

CHRISTOPHER JACOBO,  
aka "Taco Chris" (14)

JASON EASTHAM (15)

CHEYENNE MILLER,  
aka "CJ" (16)

CHRISTOPHER ARNOLD,  
aka "Phreek" (17)

**FILED UNDER SEAL**

NO. 3:14-CR-367

(Supersedes Indictment filed on September 24, 2014)

SEAN SHARER,  
aka "Cowboy Sean" (18)

ALYSHA HAYES (19)

JACLYN HOOKER,  
aka "Queen Bee" (20)

FRANCISCO CORONADO,  
aka "Frank" (21)

KENNETH ETTER (22)

JOSEPH TENPENNY (23)

DUSTY BRYANT (24)

GREGORY OLDFIELD,  
aka "Casper" (25)

CASEY ROSE (26)

MATTHEW HAYS,  
aka "Cody" (27)

PATRICIA TUCKER,  
aka "Peppermint Patty" (28)

JEFFREY HEATHINGTON (29)

RICHARD GARCIA,  
aka "Charlie Brown" (30)

MICHAEL ATKINS,  
aka "Duke" (31)

WILLIAM MCDOWELL (32)  
aka "Scout"

CHRISTY MCCCELLON (33)  
aka "90"

**FILED UNDER SEAL**

SUPERSEDING INDICTMENT

The United States Grand Jury Charges:

Introduction

1. At all times relevant to the Superseding Indictment, the defendants were members of or associated with various white supremacist organizations, including the “Aryan Brotherhood of Texas,” the “Aryan Circle,” the “Irish Mob,” 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.

### **Criminal Organizations**

2. 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 “white” 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.” Members of the ABT often referred to themselves as soldiers or “peckerwoods” (males) or “featherwoods” (females). The ABT is also an organized crime group that has put its “business” interests ahead of ideology in recent years. These business interests often take the form of criminal ventures, including drug-dealing.

3. The “Aryan Circle” was 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 believe in the complete separation of the races. The Aryan Circle is also an organized crime group, but, like the ABT, in recent years, its white supremacy ideology often takes a backseat to traditional criminal ventures, such as drug-dealing.

4. The “Irish Mob,” as that term is used in this Superseding Indictment, is a criminal organization with a presence in Tulsa, Oklahoma. The Irish Mob was formed in

the early 1990s in Tulsa. Members often refer to themselves as “Jrihar” or “brother.” Irish Mob members often engage in drug-dealing.

5. 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 the Aryan Brotherhood of Texas and other white supremacy organizations. The Dirty White Boys gang is involved in the distribution of illegal narcotics.

6. Despite their differences, the ABT, Aryan Circle, Irish Mob, and Dirty White Boys often collaborate for purposes of drug distribution or other illegal ventures.

#### Defendants

At all times relevant to this Indictment:

7. Defendants **John Carl Hall, aka “Scooter,” Michael Bass, aka “Sleepy,” Patrick Penney, aka “Pacman,” Clifton Clowers, Gregory Oldfield, aka “Casper,” Christopher Arnold, aka “Phreek,” Casey Rose, William McDowell, aka “Scout,” Brandon Crow, and Patricia Tucker, aka “Peppermint Patty”** were members or close associates of the ABT.

8. Defendants **George Pass, Cheyenne Miller, aka “CJ,” Michael McCoy, aka “Bam Bam,” Jaclyn Hooker, aka “Queen Bee,” Alysha Hayes, Rhonda Long and Jeffrey Heathington** were members or close associates of the Aryan Circle.

9. Defendants **Kenneth Etter, Joseph Tenpenny, and Dusty Bryant** were associated with the Irish Mob.

10. Defendant **Sean Sharer, aka "Cowboy Sean"** was a member of the Dirty White Boys gang.

11. At various times relevant to the indictment, defendants **Brandon Crow, John Carl Hall, aka "Scooter,"** and **William McDowell, aka "Scout"** resided together.

12. At various times relevant to the indictment, defendants **Jaclyn Hooker, aka "Queen Bee," William McDowell, aka "Scout,"** and **Clifton Clowers** resided together.

Count One

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

14. The allegations contained in paragraphs 1 through 13 are realleged and fully incorporated herein.

The Conspiracy

15. Between in or about January 2013, and on or about October 2014, in the Dallas Division of the Northern District of Texas and elsewhere, the defendants, **George Pass, aka "Tennessee," Rhonda Long, aka "Queen Saltine" Brandon Crow, Nia Reed, John Carl Hall, aka "Scooter," Cesar Zarate, Aaron Reyes, aka "Mike," Sarah West, Bradley Wiltcher, Michael Bass, aka "Sleepy," Patrick Penney, aka "Pacman," Clifton Clowers, Michael McCoy, aka "Bam Bam," Christopher Jacobo, aka "Taco Chris," Jason Eastham, Cheyenne Miller, aka "CJ," Christopher Arnold, aka "Phreek," Sean Sharer, aka "Cowboy Sean," Alysha Hayes, Jaclyn Hooker, aka "Queen Bee," Francisco Coronado, aka "Frank," Kenneth Etter, Joseph Tenpenny, Dusty Bryant, Gregory Oldfield, aka "Casper," Casey Rose, Matthew Hays, aka "Cody," Patricia Tucker, aka "Peppermint Patty," Jeffrey Heathington, Richard Garcia, aka "Charlie Brown," Michael Atkins, aka "Duke," William McDowell, aka "Scout" and Christy McCellon, aka "90" 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.

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 co-conspirators would:

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

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

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

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

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

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

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

Overt Acts

23. In furtherance of the conspiracy, the defendants, and others known and unknown to the Grand Jury, committed the following overt acts in the Dallas Division of the Northern District of Texas and elsewhere:

a. On or about February 18, 2014, **Wiltcher** sold approximately 3.5 grams of methamphetamine to an individual known to the Grand Jury.

b. On or about March 20, 2014, **West** provided seven grams of methamphetamine to **Wiltcher**. **Wiltcher** then sold the seven grams of methamphetamine to an individual known to the Grand Jury.

c. **West** admitted to obtaining ounce amounts of methamphetamine on a regular basis (either every day or every two days) for a significant period of time in 2013. **West** often sold this methamphetamine to **Wiltcher** and utilized text messages to facilitate many of these transactions.

d. On or about March 13, 2014, **Eastham** and **Jacobo** sold approximately 12 grams of methamphetamine to an individual known to the Grand Jury.

e. On or about April 3, 2014, **Oldfield** sold approximately three grams of methamphetamine to an individual known to the Grand Jury.

f. On or about April 7, 2014, **McCellon** possessed approximately one kilogram of methamphetamine.

g. On or about April 10, 2014, **Tucker** sold approximately eight grams of methamphetamine to an individual known to the Grand Jury.

h. On or before April 14, 2014, upon instructions from **Etter**, **Tenpenny** and **Bryant** traveled from Tulsa, Oklahoma to Mesquite, Texas, and obtained kilogram quantities of methamphetamine from **Coronado**.

i. On or about April 16, 2014, **Coronado** discussed possessing distribution amounts of cocaine with an individual known to the Grand Jury.

j. On or about May 12, 2014, **Penney** agreed to sell approximately seven grams of methamphetamine to an individual known to the Grand Jury.

k. On or about May 20, 2014, **Hays** possessed approximately nine grams of methamphetamine for purposes of later distribution.

l. On or about May 21, 2014, **Arnold** sold approximately 28 grams of methamphetamine to an individual known to the Grand Jury. **Arnold** obtained this methamphetamine from **Miller** on or before May 21, 2014.

m. On or about May 21, 2014, **Jacobo** possessed approximately four grams of methamphetamine.

n. On or about May 27, 2014, **Pass** and **Hayes** possessed approximately four grams of methamphetamine, drug paraphernalia, counterfeit money, and stolen credit cards.

o. On or about May 29, 2014, **Heathington** possessed approximately 14 grams of methamphetamine.

p. On or about June 7, 2014, **Sharer** possessed approximately six grams of methamphetamine.

q. On or about June 26, 2014, **Zarate** possessed approximately 69 grams of methamphetamine.

r. Between in or about June 2013 and in or about June 2014, **Wiltcher** sold approximately 1,344 grams of methamphetamine in three separate transactions.

s. Between on or about April 27, 2014, (when **Bass** was released from prison) and June 30, 2014, **Bass** supplied **Wiltcher** with distribution amounts of methamphetamine.

t. On or about June 25, 2014, **Zarate** negotiated a drug transaction with **Clowers** for approximately 36 ounces of methamphetamine. The transaction was not completed.

u. On or about June 25, 2014, **Zarate** and **Rose** negotiated a transaction involving approximately 57 grams of methamphetamine.

v. On or about April 7, 2014, **Zarate** negotiated a transaction with **McCoy** involving approximately 112 grams of methamphetamine.

w. On or about April 12, 2014, **Zarate** negotiated a transaction with **Penney** for approximately 3.5 grams of methamphetamine.

x. On or about May 18, 2014, **Zarate** and **Sharer** negotiated a transaction involving approximately 140 grams of methamphetamine.

y. On or about July 5, 2014, **Miller** possessed approximately 70 grams of methamphetamine.

z. On or about July 7, 2014, **Pass** and **Hayes** sold approximately 0.5 grams of methamphetamine to an individual known to the grand jury.

aa. Between on or about January 1, 2014, and in or about July 2014, **Hooker** supplied **Oldfield** with distribution amounts of methamphetamine.

bb. In or about 2014, **Rose** purchased distribution amounts of methamphetamine from **Hooker** on a regular and routine basis.

cc. On or about July 28, 2014, **Rose** purchased seven grams of methamphetamine from **Penney**.

dd. On multiple occasions, between in or about January 2013 and July 2014, **Bass** sold ounce quantities of methamphetamine to an individual known to the Grand Jury.

ee. On or about August 13, 2014, **Atkins** sold approximately five grams of methamphetamine to an individual known to the Grand Jury. During the same transaction, **Atkins** facilitated the sale of an additional two grams of methamphetamine.

ff. On or about August 13, 2014, **Crow** and **Reed** sold approximately 14 grams of methamphetamine to an individual known to the Grand Jury.

gg. On or about August 14, 2014, **Hall** possessed approximately 66 grams of methamphetamine. **Hall** operated a game room, which was a known distribution point for the sale of methamphetamine.

hh. Between on or about May 13, 2014, and on or about August 14, 2014, **Clowers** assisted **Hall** at a game room, which was a known distribution point for the sale of methamphetamine. During the same time frame, **Clowers** purchased methamphetamine from **Hooker**.

ii. Between in or about September 2013 and in or about September 2014, **Reyes** supplied **Crow** and **Miller** with kilogram quantities of methamphetamine.

jj. Between in or about September 2013 and in or about September 2014, **Long** brokered numerous transactions involving methamphetamine, including transactions involving **Wiltcher**, **Miller**, and **Garcia**.

kk. On or about May 14, 2014, **McDowell** negotiated a transaction with **Hooker** involving four ounces of methamphetamine. On or about May 22, 2014, **McDowell** negotiated a second transaction with **Hooker**, this one involving one ounce of methamphetamine.

ll. Between in or about January 2014, and in or about April 2014 **McDowell** introduced **Etter** to **Hooker** for the purposes of methamphetamine transactions. **McDowell** and **Etter** traveled to **Hooker's** residence and negotiated and performed transactions between **Hooker** and **Etter** involving kilogram quantities of methamphetamine. **Etter** continued to perform transactions with **Hooker**, often through intermediaries.

mm. On or about August 14, 2014, **Crow** and **Reed** possessed approximately 659 grams of methamphetamine.

Counts Two through Thirty-Two  
 Possession of a Controlled Substance with Intent to Distribute  
 [Violation of 21 U.S.C. § 841(a)(1)]

24. The allegations contained in paragraphs 1 through 23 are realleged and fully incorporated herein.

25. 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
2	George Pass, aka "Tennessee"	May 27, 2014
3	Rhonda Long, aka "Queen Saltine"	Between September 2013 and September 2, 2014
4	Brandon Crow	August 14, 2014
5	Nia Reed	August 14, 2014
6	John Carl Hall	August 14, 2014
7	Cesar Zarate	June 26, 2014
8	Aaron Reyes, aka "Mike"	Between September 2013 and September 2014
9	Sarah West	March 20, 2014
10	Bradley Wiltcher	February 18, 2014
11	Michael Bass, aka "Sleepy"	Between April 27, 2014 and June 25, 2014
12	Patrick Penney, aka "Pacman"	May 12, 2014
13	Clifton Clowers	Between May 13, 2014 and August 14, 2014
14	Michael McCoy, aka "Bam Bam"	April 7, 2014
15	Christopher Jacobo	March 13, 2014
16	Jason Eastham	March 13, 2014
17	Cheyenne Miller, aka "CJ"	July 5, 2014
18	Christopher Arnold, aka "Phreek"	May 21, 2014
19	Sean Sharer, aka "Cowboy Sean"	June 7, 2014
20	Alysha Hayes	May 27, 2014

21	<b>Jaclyn Hooker, aka "Queen Bee"</b>	Between January 1, 2014 and July 2014
22	<b>Francisco Coronado, aka "Frank"</b>	April 14, 2014
23	<b>Kenneth Etter</b>	Between January 2014, and April 2014
24	<b>Joseph Tenpenny</b>	April 14, 2014
25	<b>Dusty Bryant</b>	April 14, 2014
26	<b>Gregory Oldfield, aka "Casper"</b>	April 3, 2014
27	<b>Casey Rose</b>	July 28, 2014
28	<b>Matthew Hays, aka "Cody"</b>	May 20, 2014
29	<b>Patricia Tucker, aka "Peppermint Patty"</b>	April 10, 2014
30	<b>Jeffrey Heathington</b>	May 29, 2014
31	<b>Michael Atkins, aka "Duke"</b>	August 13, 2014
32	<b>William McDowell, aka "Scout"</b>	May 14, 2014

Count Thirty-Three

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

26. The allegations contained in paragraphs 1 through 25 are realleged and fully incorporated herein.

27. On or about May 15, 2014, in the Dallas Division of the Northern District of Texas and elsewhere, the defendant, **Patrick Penney, aka "Pacman,"** 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) and (b)(1)(C) and 18 U.S.C. § 2.

Count Thirty-Four

Possession of a Firearm by a Felon

[Violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2)]

28. The allegations contained in paragraphs 1 through 28 are realleged and fully incorporated herein.

29. On or about July 17, 2014, in the Dallas Division of the Northern District of Texas, the defendant, **Richard Garcia, aka "Charlie Brown,"** 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, a black semi-automatic .32 caliber Armi Tanfuglio Giuseppe handgun, serial number C64687.

All in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).

Count Thirty-Five

Possession of a Firearm by a Felon

[Violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2)]

30. The allegations contained in paragraphs 1 through 29 are realleged and fully incorporated herein.

31. On or about August 14, 2014, in the Dallas Division of the Northern District of Texas, the defendant, **Brandon Crow** 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, a Ruger SR40C .40 Smith & Wesson caliber handgun, serial number 343-85066.

All in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).

Forfeiture Notice

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

32. The allegations contained in paragraphs 1 through 31 are realleged and fully incorporated herein.

33. Upon conviction for any of the offenses alleged in Counts One through Thirty-Three of this Indictment and pursuant to 21 U.S.C. § 853(a), the defendants, **George Pass, aka "Tennessee," Rhonda Long, aka "Queen Saltine," Brandon Crow, Nia Reed, John Carl Hall, aka "Scooter," Cesar Zarate, Aaron Reyes, aka "Mike," Sarah West. Bradley Wiltcher, Michael Bass, aka "Sleepy," Patrick Penny, aka "Pacman," Clifton Clowers, Michael McCoy, aka "Bam Bam," Christopher Jacobo, aka "Taco Chris," Jason Eastham, Cheyenne Miller, aka "CJ," Christopher Arnold, aka "Phreek," Sean Sharer, aka "Cowboy Sean," Alysha Hayes, Jaclyn Hooker, aka "Queen Bee," Francisco Coronado, aka "Frank," Kenneth Etter, Joseph Tenpenny, Dusty Bryant, Gregory Oldfield, aka "Casper," Casey Rose, Matthew Hays, aka "Cody," Patricia Tucker, aka "Peppermint Patty," Jeffrey Heathington, Richard Garcia, aka, Charlie Brown," Michael Atkins, aka "Duke," William McDowell, aka "Scout" and Christy McCellon, aka "90"**, 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.

34. Upon conviction for either of the offenses alleged in Counts Thirty-Four or Thirty-Five of this Indictment and pursuant to 18 U.S.C. § 924(d) and 28 U.S.C.

§2461(c), the defendants, **Richard Garcia, aka "Charlie Brown"** and **Brandon Crow** shall forfeit to the United States of America all firearms and ammunition involved in or used in the respective offense.

35. The above-referenced property includes, but is not limited to, the following:  
(1) a black semi-automatic .32 caliber Armi Tanfuglio Giuseppe handgun, serial number C64687, and (2) a Ruger SR40C .40 Smith & Wesson caliber handgun, serial number 343-85066.

A TRUE BILL



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FOREPERSON

SARAH R. SALDAÑA  
UNITED STATES ATTORNEY



\_\_\_\_\_  
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SEALED

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

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THE UNITED STATES OF AMERICA

v.

GEORGE PASS, aka "Tennessee" (1), RHONDA LONG, aka "Queen Saltine" (2),  
BRANDON CROW (3), NIA REED (4), JOHN CARL HALL, aka "Scooter" (5),  
CESAR ZARATE (6), AARON REYES, aka "Mike" (7), SARAH WEST (8),  
BRADLEY WILTCHER (9), MICHAEL BASS, aka "Sleepy" (10),  
PATRICK PENNEY, aka "Pacman" (11), CLIFTON CLOWERS (12),  
MICHAEL MCCOY, aka "Bam Bam" (13), CHRISTOPHER JACOBO,  
aka "Taco Chris" (14), JASON EASTHAM (15), CHEYENNE MILLER, aka "CJ" (16),  
CHRISTOPHER ARNOLD, aka "Phreek" (17), SEAN SHARER, aka "Cowboy  
Sean" (18), ALYSHA HAYES (19), JACLYN HOOKER, aka "Queen Bee" (20),  
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aka "Casper" (25), CASEY ROSE (26), MATTHEW HAYS, aka "Cody" (27),  
PATRICIA TUCKER, aka "Peppermint Patty" (28), JEFFREY HEATHINGTON (29),  
RICHARD GARCIA, aka "Charlie Brown" (30), MICHAEL ATKINS, aka "Duke" (31),  
WILLIAM MCDOWELL (32) aka "Scout", CHRISTY MCELLON (33) aka "90"

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SUPERSEDING INDICTMENT

21 U.S.C. § 846

Conspiracy to Possess with Intent to Distribute a Controlled Substance

21 U.S.C. § 841(a)(1)

Possession of a Controlled Substance with Intent to Distribute

18 U.S.C. §§ 922(g) and 924(a)(2)

Possession of a Firearm by a Felon

21 U.S.C. § 853(a)

Forfeiture

35 Counts

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A true bill rendered

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DALLAS

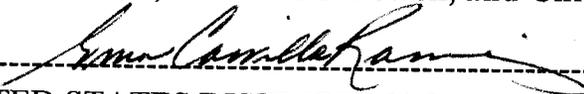
FOREPERSON

Filed in open court this 8 day of October, 2014.



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Clerk

Warrant to be issued for Brandon Crow, Nia Reed, John Carl Hall, Cesar Zarate, Aaron Reyes, Sarah West, Bradley Wiltcher, Michael Bass, Patrick Penney, Clifton Clowers, Michael McCoy, Christopher Jacobo, Jason Eastham, Cheyenne Miller, Christopher Arnold, Sean Sharer, Alysha Hayes, Jaclyn Hooker, Francisco Coronado, Kenneth Etter, Joseph Tenpenny, Dusty Bryant, Gregory Oldfield, Casey Rose, Matthew Hays, Patricia Tucker, Jeffrey Heathington, Richard Garcia, Michael Atkins, William McDowell, and Christy McCellon

  
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UNITED STATES DISTRICT/MAGISTRATE JUDGE

3:14-CR-0367-B