

**SEALED**

**FILED**

DEC 7 2018

Mark C. McCartt, Clerk  
U.S. DISTRICT COURT

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**CHRISTOPHER K. BALDWIN,  
a/k/a "Fat Bastard,"**

**MATHEW D. ABREGO,  
JEREMY C. ANDERSON,  
a/k/a "JC,"**

**DUSTIN T. BAKER,  
MICHAEL E. CLINTON,  
a/k/a "Mikey Clinton,"**

**EDDIE L. FUNKHOUSER,  
JOHNNY R. JAMESON,  
a/k/a "JJ,"**

**ELIZABETH D. LEWIS,  
a/k/a "Beth Lewis,"**

**CHARLES M. MCCULLEY,  
a/k/a "Mark McCulley,"**

**DILLON R. ROSE,  
RANDY L. SEATON,**

**BRANDY M. SIMMONS,  
JAMES C. TAYLOR, a/k/a "JT,"**

**ROBERT W. ZEIDLER,  
a/k/a "Rob Z,"**

**BRANDON R. ZIMMERLEE,  
LISA J. LARA,**

**SISNEY A. LARGE,  
RICHARD W. YOUNG,  
a/k/a "Richard Pearce,"**

**Defendants.**

Case No. **18 CR 245 JED**

**FILED UNDER SEAL**

**INDICTMENT**

**[COUNT 1: 18 U.S.C. § 1962(d) –**

**Conspiracy to Participate in a  
Racketeering Enterprise;**

**COUNT 2: 21 U.S.C. §§ 846 and**

**841(b)(1)(A)(viii) – Drug Conspiracy;**

**COUNT 3: 18 U.S.C. § 1959(a)(1) –  
Kidnapping]**

**THE GRAND JURY CHARGES:**

**COUNT ONE**  
**[18 U.S.C. § 1962(d)]**

**INTRODUCTION**

1. At all times relevant to this Indictment, the defendants, **CHRISTOPHER K. BALDWIN**, a/k/a “Fat Bastard” (“**Defendant BALDWIN**”), **MATHEW D. ABREGO** (“**Defendant ABREGO**”), **JEREMY C. ANDERSON**, a/k/a “JC” (“**Defendant ANDERSON**”), **DUSTIN T. BAKER** (“**Defendant BAKER**”), **MICHAEL E. CLINTON**, a/k/a “Mikey Clinton” (“**Defendant CLINTON**”), **EDDIE L. FUNKHOUSER** (“**Defendant FUNKHOUSER**”), **JOHNNY R. JAMESON**, a/k/a “JJ” (“**Defendant JAMESON**”), **ELIZABETH D. LEWIS**, a/k/a “Beth Lewis” (“**Defendant LEWIS**”), **CHARLES M. McCULLEY**, a/k/a “Mark McCulley” (“**Defendant McCULLEY**”), **DILLON R. ROSE** (“**Defendant ROSE**”), **RANDY L. SEATON** (“**Defendant SEATON**”), **BRANDY M. SIMMONS** (“**Defendant “SIMMONS”**”), **JAMES C. TAYLOR**, a/k/a “JT” (“**Defendant “TAYLOR”**”), **BRANDON R. ZIMMERLEE** (“**Defendant ZIMMERLEE**”), **ROBERT W. ZEIDLER**, a/k/a “Rob Z” (“**Defendant ZEIDLER**”), and others known and unknown to the Grand Jury, were members of the Universal Aryan Brotherhood (hereinafter “UAB”), a criminal organization whose members and associates engaged in drug distribution and acts of violence involving murder, kidnapping, assault, money laundering, and robbery, and which operated throughout the State of Oklahoma, including the Northern, Eastern, and Western Districts of Oklahoma, and elsewhere.

## STRUCTURE AND OPERATION OF THE ENTERPRISE

2. The structure of the UAB included, but was not limited to, the following:

a. The UAB was a violent “whites only” prison-based gang with hundreds of members operating inside and outside of state penal institutions throughout Oklahoma.

The UAB offered protection to white inmates if they joined the gang.

b. The traditional power centers of the UAB, and members of the gang’s leadership structure, were predominately located in prisons operated by the Oklahoma Department of Corrections (“ODOC”), the Correctional Corporation of America (“CCA”), and cities and rural areas throughout Oklahoma. The UAB was established in 1993 within ODOC. The UAB modeled itself after the principles and ideology of the Aryan Brotherhood, a California-based prison gang that was formed in the California prison system during the 1960s.

c. The UAB had a detailed and uniform organizational structure, which was outlined along with various rules, procedures, and codes of conduct in written “By-Laws” widely distributed to members throughout Oklahoma and elsewhere.

d. The UAB had a defined militaristic structure. The UAB was overseen and directed by a “Main Council.” The Main Council had ultimate authority in all gang matters. Subordinate members served to support the Main Council, and to enforce UAB members’ discipline and adherence to established UAB rules and laws. Members of the Main Council were generally imprisoned at Oklahoma State Penitentiary-McAlester,

commonly referred to as the “Walls,” but Main Council members could often be found at other institutions throughout the Oklahoma penal system and outside of prison. The “Sub-Council” reported to the Main Council and functioned in each medium security prison throughout Oklahoma. The Sub-Council was treated as an extension of the Main Council. Members of the Sub-Council passed down orders from the Main Council and had the authority to issue orders to lower ranking members within their respective institutions.

e. Each prison facility had a UAB “Yard Captain” who reported to the Sub-Council or Main Council. The Yard Captain, who was also referred to as a “Shot-Caller,” carried out orders handed down from the Sub-Council or Main Council. The Yard Captain was considered a frontline leader in any conflict inside the Yard Captain’s prison. The Yard Captain collected intelligence, oversaw security, enforced order, and imposed discipline as directed by the Sub-Council or Main Council.

f. UAB members not holding rank were considered “soldiers.” Members of all ranks were expected to fight and commit acts of violence at the direction of senior leaders. The Main Council and other UAB leadership also issued orders and directed the criminal activity of UAB members in the “free world,” that is, UAB members and associates who were not incarcerated.

g. UAB leaders had the authority within the gang to issue “D.O.’s” (direct orders) and to mete out punishment. A “D.O.” was an assignment given to a subordinate UAB member that would serve a purpose for the UAB. The “D.O.” could range from a leader ordering an “S.O.S.” (stab or smash on sight), meaning the assault of a rival gang

member or of a UAB member who had committed a violation of the UAB rules, to a “green light,” or “X,” meaning the murder of a rival gang member or of a UAB member who had committed an egregious violation of the gang’s rules. Failure to perform a “D.O.” resulted in the assigned member being in violation of the rules. Punishment for failing to complete the “D.O.” could range anywhere from a beating to death.

h. The UAB employed a robust symbology as well, using depictions of Nazi-era inspired symbols and artwork to demonstrate their affiliation. Members often had tattoos incorporating one or more Nazi-era symbols including, but not limited to, the Nazi flag, swastika, Iron Eagle, and Schutzstaffel (“SS”) lightning bolts. The most coveted tattoo of UAB membership was the UAB patch, which could be worn only by a fully-made member who ascended to full membership by successfully completing his prospecting period. The design and shape of the patch consisted of a circular design with “SS” lightning bolts in the middle. Phrases unique to the UAB lexicon included “14-88,” “2112,” “U.F.F.E,” and “T.T.B.B.E.” The phrase “14-88” was used by UAB gang members to demonstrate their collective affiliation to the gang, which was also popular among other Aryan Brotherhood, Neo-Nazi, and White Supremacist organizations. The “14” in “14-88” was an alphanumeric code that referred to a phrase known as the “Fourteen Words” which read: “We must secure the existence of our people and a future for white children.” The “88” in “14-88” referred to the letter H which is the eighth letter in the alphabet and signified the phrase “Heil Hitler.” The alphanumeric code “2112” referenced the twenty-

first, first, and second letters of the alphabet, and spelling out “U.A.B.” The letters “U.F.F.E.” formed an acronym representing “Universal Forever, Forever Universal.” The letters “T.T.B.B.E” stood for “Till The Bitter Bloody End.” The gang also incorporated these phrases into tattoos, which they used to show their membership in the gang. The colors associated with the UAB were black and red, and members of the UAB often demonstrated their affiliation with the UAB by wearing clothing containing the colors black and red or incorporating some of the gang’s other symbols or phrases.

i. Once released from incarceration, UAB members were required to remain loyal to the UAB and were required to report immediately to outside or incarcerated leaders to further the goals of the UAB through criminal activity. One of the goals of the UAB was to recruit new members. UAB members were recruited from both inside and outside the Oklahoma penal system.

j. UAB members were required to find new members for the gang, commonly referred to as “prospects.” In order to be considered for UAB membership, a person had to be sponsored by a fully patched member. The sponsoring UAB member was responsible for conducting a background investigation of the prospect to ensure that he was not a sex offender, a law enforcement cooperator, or otherwise undesirable for gang membership. Once sponsored, a prospective member had to serve an unspecified term and his conduct was observed by other gang members. During this period, the prospect was required to study and learn the UAB “By-Laws” and was required to “put in work” for the gang by

carrying out tasks or “missions” ordered by members of the UAB in order to prove his loyalty to the gang. Missions included, but were not limited to, violent assaults against rival gangs or UAB members who had violated UAB by-laws. If a prospect had successfully completed his “missions,” he would become a fully patched member upon the majority vote of the Main Council. Prospects commonly received a tattoo of the number “21,” which represents the twenty-first letter of the alphabet, “U,” meaning “Universal.”

k. In addition to members and prospects, the enterprise included those closely affiliated with the UAB, who were called “associates.” Associates who did not fulfill their obligations to the UAB were sometimes subjected to violence. While females were not allowed to become members of the UAB, those females who associated with the UAB and engaged in criminal activity for the benefit of the UAB were often referred to as “featherwoods.” Female associates functioned as communication hubs, facilitating gang communication among imprisoned members through the use of cell phones, social media, and United States mail. Female associates also transported illegal drugs and managed the financial proceeds from drug sales at the direction of ranking UAB members.

### **THE RACKETEERING ENTERPRISE**

3. The UAB, including its leaders, members, and associates, constituted an “enterprise,” as defined in Title 18, United States Code, Section 1961(4) (hereinafter “the enterprise”), that is, a group of individuals associated in fact. The enterprise constituted an

ongoing organization whose members and associates functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise. This enterprise was engaged in, and its activities affected, interstate and foreign commerce.

#### **PURPOSES OF THE ENTERPRISE**

4. The purposes of the enterprise included, but were not limited to, the following:

a. Enriching the leaders, members, and associates of the enterprise through, among other things, the illegal trafficking of controlled substances and firearms.

b. Preserving and protecting the power, territory, operations, and proceeds of the enterprise through the use of threats, intimidation, violence, and destruction.

c. Promoting and enhancing the enterprise and its members' and associates' activities.

d. Keeping victims in fear of the enterprise and in fear of its leaders, members, and associates through threats of violence and actual violence. The leaders, members, and associates of the enterprise undertook all steps necessary to prevent the detection of their criminal activities and sought to prevent and resolve the imposition of any criminal liabilities upon their leaders, members, and associates, by the use of violence and intimidation directed against witnesses, victims, and others.

e. Providing support to gang members, who were charged with, or incarcerated for, gang-related activities, and family members or associates who needed assistance.



## MANNER AND MEANS OF THE CONSPIRACY

5. The defendants and co-conspirators agreed to facilitate a scheme that included the operation and management of the enterprise by a conspirator. Members and associates of the enterprise operated and conducted their affairs through a series of rules and policies, some of which were codified in by-laws.

a. The members and associates of the enterprise would meet on occasion to collect money, mete out punishment, declare war on rival gang members, and conduct other business of the enterprise.

b. To enforce discipline and the rules of the enterprise, members and associates of the enterprise engaged in a system in which the defendants and others physically assaulted and threatened those members and associates of the enterprise who violated rules, questioned authority, and posed a threat to the leaders, members, and purposes of the enterprise.

c. Members and associates of the enterprise employed and used gang-related terminology, symbols, gestures, and color schemes.

d. To perpetuate the enterprise and to maintain and extend its power, members and associates of the enterprise committed and conspired to intimidate and assault individuals who posed a threat to the enterprise and jeopardized its operations, including rival gang members, UAB gang members who violated the gang's by-laws, and witnesses to illegal activities of the enterprise.

e. Members and associates of the enterprise managed the procurement, transfer, use, concealment, and disposal of firearms and dangerous weapons within the enterprise to protect gang-related criminal activities, personnel, and operations, and to deter, eliminate, and retaliate against competitors and other rival criminal organizations and persons.

f. Members and associates of the enterprise regularly financed their activities through funds obtained in the illegal trafficking of controlled substances including, but not limited to, the distribution and possession with the intent to distribute methamphetamine and marijuana.

g. Members and associates of the enterprise committed acts of violence and intimidation to exert control over illegal narcotic markets, and to further increase the power and influence of the enterprise.

h. Members and associates of the enterprise misrepresented, concealed, hid, and caused to be misrepresented, concealed, and hidden, the objectives of acts done in furtherance of the conspiracy, and used coded language and other means to avoid detection and apprehension by law enforcement authorities.

i. Members, associates, prospects of the enterprise, and others used cell phones, contraband and otherwise, social media, and “kites” to communicate with each other to further their illegal activities.

j. Members and associates of the enterprise used various money transfer

methods and facilities to move and hide the proceeds from their illegal drug activities. These facilities included but were not limited to “Green Dot” MoneyPaks, Walmart to Walmart money transfers and banking institutions.

k. Members and associates of the enterprise did kidnap others, to enforce discipline, recoup drug and other debts, and to ensure that individuals were not cooperating with law enforcement.

l. Members and associates of the enterprise did commit robberies and home invasions to obtain money, drugs, and firearms for the benefit of the enterprise.

### THE RACKETEERING CONSPIRACY

6. Beginning on a date unknown to the Grand Jury, but at least as early as in or about 2005, and continuing through on or about the date of this Indictment, in the Northern District of Oklahoma and elsewhere, the defendants, **CHRISTOPHER K. BALDWIN**, a/k/a “Fat Bastard,” **MATHEW D. ABREGO**, **JEREMY C. ANDERSON**, a/k/a “JC,” **DUSTIN T. BAKER**, **MICHAEL E. CLINTON**, a/k/a “Mikey Clinton,” **EDDIE L. FUNKHOUSER**, **JOHNNY R. JAMESON**, a/k/a “JJ,” **ELIZABETH D. LEWIS**, a/k/a “Beth Lewis,” **CHARLES M. McCULLEY**, a/k/a “Mark McCulley,” **DILLON R. ROSE**, **RANDY L. SEATON**, **BRANDY M. SIMMONS**, **JAMES C. TAYLOR**, a/k/a “JT,” **BRANDON R. ZIMMERLEE**, and **ROBERT W. ZEIDLER**, a/k/a “Rob Z,” being persons employed by and associated with the UAB, an enterprise engaged in, and the activities of which affected, foreign and interstate commerce, did knowingly conspire,

confederate and agree with each other and with others known and unknown to the Grand Jury to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and 1961(5) consisting of multiple offenses involving drug trafficking, in violation of Title 21, United States Code, Sections 841(a)(1) (possession with intent to distribute and distribution of controlled substances), 843 (use of a communication facility to facilitate a drug transaction), and 846 (conspiracy to possess with the intent to distribute and to distribute controlled substances); multiple acts indictable under Title 18, United States Code, Section 1956 (money laundering); and multiple acts involving kidnapping, conspiracy to commit kidnapping, and attempted kidnapping chargeable under Title 21, Oklahoma Statutes, Sections 741, 421, and 44; murder, conspiracy to commit murder, and attempted murder chargeable under Title 21, Oklahoma Statutes, Sections 701.7(A), 701.8(1), 421, and 44; and robbery, conspiracy to commit robbery, and attempted robbery chargeable under Title 21, Oklahoma Statutes, Sections 791, 794, 797, 800, 801, 421, and 44. It was part of this conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering in the conduct of the affairs of the enterprise.

#### **OVERT ACTS**

7. In furtherance of the conspiracy and to achieve the object thereof, the defendants committed and caused to be committed the following overt acts, among others, in the Northern District of Oklahoma and elsewhere.

a. On or about July 10, 2005, **Defendant JAMESON** and unindicted co-conspirators 1 and 2 stabbed Donald Jones to death in the Cimarron Correctional Facility based upon a standing order from UAB leadership directing retaliation against black inmates for the death of UAB member Adam Lippert.

b. On or about March 13, 2008, unindicted co-conspirators 3 and 4, UAB members, beat Brian Abernathy to death in retaliation for Abernathy stabbing a UAB member.

c. On or about July 19, 2009, unindicted co-conspirator 5, a UAB member, upon orders from the UAB Main Council, beat Blake Ford to death.

d. On or about May 3, 2011, unindicted co-conspirator 6 and other UAB members known and unknown to the Grand Jury, conducted a home invasion in Tulsa, Oklahoma, to acquire firearms in order to strengthen the UAB enterprise. During this home invasion, numerous firearms were taken.

e. On or about May 31, 2011, unindicted co-conspirator 6 and others, known and unknown to the Grand Jury, conducted a home invasion in Prue, Oklahoma, to acquire drugs and firearms in order to strengthen the UAB enterprise.

f. On or about May 31, 2011, immediately following the home invasion in Prue, Oklahoma, UAB member Billy Joe Hamons, during an attempted carjacking in Tulsa, Oklahoma shot and killed Sufeng He.

g. On or about May 31, 2011, immediately following the murder of Sufeng He, UAB member Billy Joe Hamons carjacked a vehicle from R.S. and his family in Tulsa,

Oklahoma. Hamons crashed the vehicle stolen from R.S. and was eventually shot and killed by Tulsa police officers.

h. On or about December 30, 2011, unindicted co-conspirator 7, a UAB member, upon orders from the UAB Main Council, assaulted UAB member James Mask. This assault resulted in Mask's death.

i. On or about May 17, 2012, unindicted co-conspirator 8, a UAB member, and unindicted co-conspirator 9, a UAB prospect, beat Anthony Mollman to death for cooperating with law enforcement.

j. On or about May 2, 2013, **Defendant BALDWIN** and **Defendant CLINTON** ordered unindicted co-conspirators 10 through 14 to kidnap and maim unindicted co-conspirator 6 by removing his UAB patch for disrespecting UAB leadership.

k. On or about August 1, 2013, **Defendant ZEIDLER** directed the delivery of approximately six pounds of methamphetamine to unindicted co-conspirator 15, a UAB member, for the benefit of the UAB enterprise.

l. On or about September 19, 2013, **Defendant ZEIDLER** and unindicted co-conspirator 16, a UAB member, directed the delivery of approximately two pounds of methamphetamine, packaged by Lisa J. Lara, to unindicted co-conspirator 17 for the benefit of the UAB enterprise.

m. On or about September 27, 2013, at the direction of **Defendant ZEIDLER**, UAB associate Lisa J. Lara transported approximately 30 pounds of methamphetamine for the benefit of the UAB enterprise.

n. On or about June 20, 2014, at the direction of **Defendant TAYLOR**, unindicted co-conspirator 13 possessed methamphetamine with intent to distribute it for the benefit of the UAB enterprise.

o. On or about July 3, 2014, at the direction of **Defendant TAYLOR**, unindicted co-conspirator 18 possessed approximately 12 ounces of methamphetamine with intent to distribute it for the benefit of the UAB enterprise.

p. On or about August 18, 2014, at the direction of **Defendant TAYLOR**, unindicted co-conspirator 19, a UAB member, and unindicted co-conspirator 20, a UAB associate, possessed approximately five ounces of methamphetamine with intent to distribute it for the benefit of the UAB enterprise.

q. On or about October 26, 2014, **Defendants McCULLEY, FUNKHOUSER, SEATON**, and **ZIMMERLEE** kidnapped and threatened E.F. and E.S., two females known to the Grand Jury.

r. On or about September 12, 2015, **Defendants ANDERSON, CLINTON, BALDWIN**, and **JAMESON** ordered UAB members to attack Irish Mob Gang members, resulting in the murder of two Irish Mob Gang members.

s. On or about September 21, 2016, at the direction of unindicted co-conspirator 21, a UAB member, and **Defendant BALDWIN**, unindicted co-conspirator 22, a UAB associate, possessed methamphetamine with intent to distribute it for the benefit of the UAB enterprise.

t. On or about December 6, 2016, at the direction of **Defendants TAYLOR** and **LEWIS**, unindicted co-conspirators 23 and 24 possessed with intent to distribute

approximately three and one-half pounds of methamphetamine for the benefit of the UAB enterprise.

u. On or about January 30, 2017, at the direction of **Defendant LEWIS**, unindicted co-conspirator 25, a UAB member, robbed and maimed Richard W. Young for the benefit of the UAB enterprise.

v. On or about February 2, 2017, at the direction of **Defendant CLINTON**, **Defendant SIMMONS** possessed approximately two pounds of methamphetamine with intent to distribute it for the benefit of the UAB enterprise.

w. In or about February 2017, **Defendant CLINTON** ordered UAB members to kill UAB member R.H. for suspected cooperation with law enforcement for the benefit of the UAB enterprise.

x. On or about March 21, 2017, **Defendant CLINTON** ordered UAB members and associates to kidnap, assault, and collect a drug debt from **Defendant LEWIS** for the benefit of the UAB enterprise.

y. In or about September 2017, **Defendant JAMESON** ordered a UAB member to pay a drug debt owed to **Defendant BALDWIN**.

z. On or about September 15, 2017, unindicted co-conspirator 26 received a drug debt payment via Walmart money transfer for a drug debt owed to **Defendant BALDWIN** for the benefit of the UAB enterprise.

aa. On or about October 4, 2017, **Defendants ROSE** and **BAKER** kidnapped and robbed Jason Harris.



bb. On or about October 4, 2017, **Defendant BAKER** shot and killed Jason Harris.

cc. On or about October 6, 2017, based upon a drug debt owed to **Defendant BALDWIN, BALDWIN** ordered other UAB members and associates to assault unindicted co-conspirator 27, a UAB member. This assault resulted in the hospitalization of unindicted co-conspirator 27.

dd. On or about November 2, 2017, at the direction of unindicted co-conspirator 28, a UAB member, and **Defendant ABREGO**, unindicted co-conspirator 29, a UAB associate, possessed methamphetamine with intent to distribute it for the benefit of the UAB enterprise.

ee. On or about February 12, 2018, at the direction of unindicted co-conspirator 30, a UAB member, unindicted co-conspirator 27, a UAB member, possessed a firearm and approximately one pound of methamphetamine with intent to distribute it for the benefit of the UAB enterprise.

ff. On or about February 12, 2018, unindicted co-conspirator 30 directed the delivery of approximately six kilograms of methamphetamine for the benefit of the UAB enterprise.

gg. On or about June 22, 2018, unindicted co-conspirator 28 and unindicted co-conspirator 31, a UAB associate, possessed a firearm and approximately six ounces of methamphetamine with intent to distribute it for the benefit of the UAB enterprise.

hh. On or about July 13, 2018, unindicted co-conspirator 32, a UAB member, and unindicted co-conspirator 33, a UAB associate, possessed methamphetamine with

intent to distribute it and approximately 30 firearms, including fully-automatic pistols, a firearm suppressor, and ammunition for the benefit of the UAB enterprise.

ii. Beginning on a date unknown to the Grand Jury, but at least as early as 2011, and continuing through the date of this Indictment, **Defendants BALDWIN, ABREGO, ANDERSON, BAKER, CLINTON, FUNKHOUSER, JAMESON, LEWIS, McCULLEY, ROSE, SEATON, SIMMONS, TAYLOR, ZIMMERLEE, ZEIDLER,** Lisa J. Lara, Sisney A. Large, Richard W. Young, and others known and unknown to the Grand Jury, sold methamphetamine for the benefit of the UAB enterprise.

jj. Beginning on a date unknown to the Grand Jury, but at least as early as 2011, and continuing through the date of this Indictment, **Defendants BALDWIN, JAMESON, CLINTON, ANDERSON, ABREGO, TAYLOR, ZEIDLER, LEWIS, SIMMONS, BAKER, ROSE,** Sisney A. Large, and others known and unknown to the Grand Jury, transferred and received thousands of dollars in illegal drug proceeds using cash transfers, stored value cards, PayPal, and Walmart money transfers for the benefit of the UAB enterprise.

kk. Beginning on a date unknown to the Grand Jury, but at least as early as October 2012, and continuing through at least August 2013, at the direction of **Defendant ZEIDLER** and unindicted co-conspirator 16, unindicted co-conspirators 15 and 34 through 36, and others known and unknown to the Grand Jury, deposited hundreds of thousands of dollars in illegal drug proceeds into bank accounts for the benefit of the UAB enterprise.

**Notice of Enhanced Sentencing**

8. From in or about 2005, and continuing through on or about the date of this Indictment, in the Northern District of Oklahoma and elsewhere, the defendants, **CHRISTOPHER K. BALDWIN**, a/k/a “Fat Bastard,” **MATHEW D. ABREGO**, **JEREMY C. ANDERSON**, a/k/a “JC,” **DUSTIN T. BAKER**, **MICHAEL E. CLINTON**, a/k/a “Mikey Clinton,” **EDDIE L. FUNKHOUSER**, **JOHNNY R. JAMESON**, a/k/a “JJ,” **ELIZABETH D. LEWIS**, a/k/a “Beth Lewis,” **CHARLES M. McCULLEY**, a/k/a “Mark McCulley,” **DILLON R. ROSE**, **RANDY L. SEATON**, **BRANDY M. SIMMONS**, **JAMES C. TAYLOR**, a/k/a “JT,” **BRANDON R. ZIMMERLEE**, and **ROBERT W. ZEIDLER**, a/k/a “Rob Z,” knowingly and intentionally conspired to possess with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

9. On or about July 10, 2005, **JOHNNY R. JAMESON**, a/k/a “JJ,” murdered Donald Jones; to wit, **Defendant JAMESON** unlawfully and with malice aforethought caused the death of Donald Jones, in violation of Title 21, Oklahoma Statutes, Section 701.7(A); and **Defendant JAMESON** killed Donald Jones, and such killing was perpetrated by an act imminently dangerous to another person and evincing a depraved mind, regardless of human life, although without any premeditated design, to effect the death of any particular individual, in violation of Title 21, Oklahoma Statutes, Section 701.8(1).

10. On or about October 4, 2017, **DUSTIN T. BAKER** and **DILLON R. ROSE** murdered Jason Harris; to wit, **Defendants BAKER and ROSE** took the life of another human being, Jason Harris, during the commission of a robbery with a dangerous weapon and kidnapping, in violation of Title 21, Oklahoma Statutes, Section 701.7(B).  
All in violation of Title 18, United States Code, Section 1962(d).

**COUNT TWO**  
**[21 U.S.C. §§ 846 and 841(b)(1)(A)(viii)]**

Beginning on a date unknown to the Grand Jury, but at least as early as in or about 2011, and continuing through the date of this Indictment, in the Northern District of Oklahoma and elsewhere, the defendants, **CHRISTOPHER K. BALDWIN**, a/k/a “Fat Bastard,” **MATHEW D. ABREGO**, **JEREMY C. ANDERSON**, a/k/a “JC,” **DUSTIN T. BAKER**, **MICHAEL E. CLINTON**, a/k/a “Mikey Clinton,” **EDDIE L. FUNKHOUSER**, **JOHNNY R. JAMESON**, a/k/a “JJ,” **ELIZABETH D. LEWIS**, a/k/a “Beth Lewis,” **CHARLES M. McCULLEY**, a/k/a “Mark McCulley,” **DILLON R. ROSE**, **RANDY L. SEATON**, **BRANDY M. SIMMONS**, **JAMES C. TAYLOR**, a/k/a “JT,” **BRANDON R. ZIMMERLEE**, **ROBERT W. ZEIDLER**, a/k/a “Rob Z,” **LISA J. LARA**, **SISNEY A. LARGE**, and **RICHARD W. YOUNG**, a/k/a “Richard Pearce,” did knowingly, intentionally and willfully conspire, confederate, and agree with each other and others, known and unknown to the Grand Jury, to violate Title 21, United States Code, Section 841(a)(1), to wit:

1. to knowingly and intentionally possess with the intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance; and

2. to knowingly and intentionally distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(A)(viii).

**COUNT THREE**  
**[18 U.S.C. § 1959(a)(1)]**

1. At all times relevant to this Indictment, in the Northern District of Oklahoma and elsewhere, the United Aryan Brotherhood (“UAB”), as more fully described in paragraphs One through Five of Count One of this Indictment, which are re-alleged and incorporated by reference as though fully set forth herein, including its leaders, members, and associates, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact, which was engaged in, and the activities of which affected, interstate and foreign commerce. The UAB constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objective of the enterprise.

2. At all times relevant to this Indictment, the above-described enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, multiple offenses involving (a) drug trafficking, in violation of Title 21, United States Code, Sections 841, 843, and 846; (b) acts involving murder, kidnapping, and robbery in violation of Oklahoma state law; and (c) acts indictable under Title 18, United States Code, Section 1956 (money laundering).

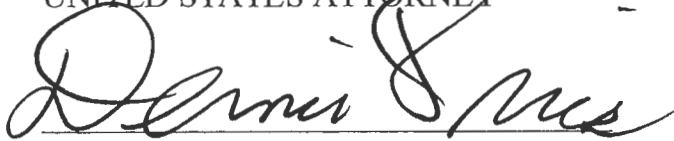
3. On or about October 26, 2014, in the Northern District of Oklahoma, the defendants, **CHARLES M. McCULLEY**, a/k/a “Mark McCulley,” **EDDIE L. FUNKHOUSER**, **RANDY L. SEATON**, and **BRANDON R. ZIMMERLEE**, and others known and unknown to the Grand Jury, aiding and abetting each other, for the purpose of

increasing position in the UAB, kidnapped E.F. and E.S., persons known to the Grand Jury,  
in violation of Title 21, Oklahoma Statutes, Section 741.

All in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

R. TRENT SHORES  
UNITED STATES ATTORNEY

A TRUE BILL



DENNIS A. FRIES  
Assistant United States Attorney

/s/Grand Jury Foreperson

Grand Jury Foreperson