

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**  
v. : Honorable Michael A. Hammer  
KEITH RICHTER, : Mag. No. 21-10099  
a/k/a "Conan" :

I, Cyril Pereira, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

*Cyril Pereira*  
\_\_\_\_\_  
Cyril Pereira, Special Agent  
Bureau of Alcohol, Tobacco, Firearms, and Explosives

Special Agent Pereira attested to this Complaint by telephone pursuant to F.R.C.P. 4.1

02/25/2021  
Date

at District of New Jersey  
County and State

HONORABLE MICHAEL A. HAMMER  
UNITED STATES MAGISTRATE JUDGE

*Michael A. Hammer*  
\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

**(Possession of a Firearm and Ammunition by a Convicted Felon)**

On or about February 21, 2021, in the District of New Jersey and elsewhere, the defendant,

**KEITH RICHTER,  
a/k/a "Conan,"**

knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm in and affecting commerce, namely, a Ruger P345 .45 caliber handgun, bearing serial number 664-28083, loaded with at least one (1) round of .45 caliber ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

## **ATTACHMENT B**

I, Cyril Pereira, am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and photographs of the evidence. Where statements of others are related herein, they are related in substance and part. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. The Pagan's Motorcycle Club (the "Pagans") is an outlaw motorcycle gang known by law enforcement to engage in criminal activity, including drug trafficking, weapons trafficking, and violent crimes. Through investigative techniques including, but not limited to, surveillance, public records searches, and sources of law enforcement intelligence, law enforcement has confirmed that Keith Richter, a/k/a "Conan" ("RICHTER"), currently serves as the Pagans' national president.

2. On or about February 20, 2021, the Pagans hosted a party in Lancaster, Pennsylvania. At approximately 7:00 a.m. on that date, RICHTER left his residence in Bay Shore, New York in a white GMC (the "GMC"). He arrived at the party sometime around noon. At approximately 11:10 p.m., RICHTER left the Pagans' party as the passenger in the GMC while another member of the Pagans ("Individual-1") drove. While the party was ongoing, law enforcement learned that RICHTER was in possession of a firearm. As a result of that information, law enforcement performed a motor vehicle stop on the GMC after it left the party. At approximately 1:30 a.m. on or about February 21, 2021, law enforcement pulled the GMC over in or around East Windsor, New Jersey. During the stop, law enforcement searched the GMC and recovered a firearm from a hollowed-out compartment underneath the cupholder in the front-seat center console. The firearm was identified as a Ruger P345 .45 caliber handgun, bearing serial number 664-28083 (the "Firearm") and was loaded with at least one round of .45 caliber ammunition (the "Ammunition").

3. After seizing the Firearm and the Ammunition, law enforcement advised RICHTER and Individual-1 that they were free to leave. As RICHTER and Individual-1 re-entered the GMC, a Special Agent for the Bureau of Alcohol, Tobacco, Firearms, and Explosives heard RICHTER say, in sum and substance, "I guess they didn't find it."

4. The Firearm and the Ammunition were manufactured outside the State of New Jersey, and thus necessarily traveled in interstate commerce prior to February 21, 2021. In addition, RICHTER himself traveled across state lines

with the Firearm and Ammunition from Lancaster, Pennsylvania to East Windsor, New Jersey.

5. On or about September 4, 1998, RICHTER was convicted in the United States District Court for the Eastern District of New York of felony offenses, including one count of conspiracy to commit murder in aid of racketeering and two counts of attempted assault with a dangerous weapon in aid of racketeering, all in violation of 18 U.S.C. § 1959. RICHTER was sentenced to a sixteen-year term of imprisonment for those offenses, from which he was released on or about March 1, 2012.