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CLERK U S DISTRICT COURT DISTRICT OF ARIZONA	
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11 IN THE UNITED STATES DISTRICT COURT
12 FOR THE DISTRICT OF ARIZONA

13 United States of America,
14
15 Plaintiff,

16 vs.

- 17 1. Samuel Rappylee Bateman,
(Counts 1-11, 13-45, 47-53)
- 18 2. Naomi Bistline,
19 (Counts 47-50)
- 20 3. Donnae Barlow,
(Counts 47-50),
- 21 4. Moretta Rose Johnson,
22 (Counts 47-50)
- 23 5. Josephine Barlow Bistline,
24 (Counts 11, 13, 17, 26-28, 30-32,
54-56)
- 25 6. LaDell Bistline, Jr.,
(Counts 12, 13, 26-28, 30-32)
- 26 7. Brenda Barlow,
27 (Counts 13, 39-43, 46-50)
- 28 8. Marona Johnson,
(Count 13)

No. CR-22-08092-PCT-DGC

**REDACTED SECOND
SUPERSEDING
INDICTMENT**

- VIO: 18 U.S.C. § 371
(Conspiracy to Commit Persuasion
and Coercion)
Count 1
- 18 U.S.C. § 2423(e)
(Conspiracy to Commit
Transportation of a Minor for
Criminal Sexual Activity)
Count 2
- 18 U.S.C. § 2423(e)
(Conspiracy to Commit Interstate
Travel with the Intent to Engage in
Illicit Sexual Conduct with a Minor)
Count 3
- 18 U.S.C. §§ 2422(a) and 2
(Persuading or Coercing Travel to
Engage in Sexual Activity,
Aid and Abet)
Counts 4, 7, 14, 18, 21, 26, 30, 33

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9. Leia Bistline,
(Counts 17, 25)
10. Torrance Bistline, and
(Counts 25, 40-43)
11. Leilani Bistline,
(Counts 33-35)

Defendants.

18 U.S.C. §§ 2422(b) and 2
(Using a Means of Interstate
Commerce to Persuade or Coerce a
Minor to Engage in Sexual Activity,
Aid and Abet)
Counts 5, 8, 15, 17, 19, 22, 25, 27,
31, 34

18 U.S.C. §§ 2423(a) and 2
(Transportation of a Minor for
Criminal Sexual Activity,
Aid and Abet)
Counts 6, 9, 10, 16, 20, 23, 28, 29,
32, 35, 36, 38, 39

18 U.S.C. §§ 2251(a), (e), 2256,
and 2
(Production of Child Pornography,
Attempt and Aid and Abet)
Count 11

18 U.S.C. §§ 2252(a)(2), (b)(1),
and 2256
(Receipt of Child Pornography)
Count 12

18 U.S.C. §§ 1470 and 2
(Transfer of Obscene Material to a
Minor, Aid and Abet)
Count 13

18 U.S.C. §§ 2423(b) and 2
(Interstate Travel with Intent to
Engage in Illicit Sexual Conduct
with a Minor, Aid and Abet)
Counts 24, 37

18 U.S.C. §§ 1512(c)(1) and 2
(Destruction of Records in an
Official Proceeding, Aid and
Abet)
Counts 40, 46

18 U.S.C. § 1512(k)
(Conspiracy to Commit Destruction
of Records in an Official
Proceeding)
Count 41

18 U.S.C. §§ 1512(c)(2) and 2
(Tampering with an Official
Proceeding, Aid and Abet)
Counts 42, 47, 51, 56

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18 U.S.C. § 1512(k)
(Conspiracy to Commit Tampering
with an Official Proceeding)
Counts 43, 48, 52

18 U.S.C. §§ 1519 and 2
(Destruction of Records in a Federal
Investigation, Aid and Abet)
Count 44

18 U.S.C. §§ 1512(b)(1) and 2
(Tampering with a Witness,
Aid and Abet)
Counts 45, 53

18 U.S.C. §§ 1201(a)(1), (b), and 2
(Kidnapping and Aid and Abet)
Count 49

18 U.S.C. § 1201(c)
(Conspiracy to Commit Kidnapping)
Count 50

18 U.S.C. § 875(c)
(Interstate Threats)
Count 54

18 U.S.C. §§ 2261A(2) and 2261(b)
(Cyberstalking)
Count 55

18 U.S.C. §§ 981, 2253, and 2428;
21 U.S.C. § 853; and
28 U.S.C. § 2461(c)
(Forfeiture Allegation)

THE GRAND JURY CHARGES:

INTRODUCTION

1. Beginning in 2019 or earlier, defendant SAMUEL RAPPYLEE BATEMAN proclaimed himself to be the Prophet of the Fundamentalist Church of Jesus Christ of Latter-Day Saints (“FLDS”), a subset of the fundamentalist Mormon denominations whose members practice polygamy.
2. The FLDS church traces its origins to the 1950s in the Short Creek Community (now the twin cities of Hildale, Utah, and Colorado City, Arizona). Colorado

1 City has a population of approximately 2,500 people as of the 2020 census, and just over
2 nine (9) square miles.

3 3. Defendant BATEMAN proclaimed himself to be the successor of Warren
4 Jeffs, the former leader of the FLDS who is known to his followers as “Uncle Warren.”
5 Jeffs was reported to have up to 78 wives, including minors. Jeffs is currently serving a
6 life sentence for sexually assaulting some of his underage wives.

7 4. In 2019 and 2020, defendant BATEMAN began taking female adults and
8 children from his male followers and proclaiming them to be his “wives.” Defendant
9 BATEMAN amassed over 20 wives, including minor girls as young as nine (9) years old.
10 None of these “marriages” were legally recognized.

11 5. At times relevant to this Second Superseding Indictment, defendant
12 BATEMAN had followers residing in Lincoln, Nebraska; Cedar City, Utah; Monument,
13 Colorado; and Colorado City, Arizona. He traveled to and between these locations to
14 increase his following and claim wives, ten (10) of whom were under the age of 18. His
15 intent was to engage in sexual activity with minor girls, and he did so on a regular basis.
16 By March 2021, defendant BATEMAN had moved his followers to Colorado City,
17 Arizona, where he resided with his wives until September 13, 2022.

18 **COUNT 1**

19 6. The allegations contained in paragraphs 1 through 5 are realleged and
20 incorporated herein as if fully set forth in this paragraph.

21 7. Beginning at a time unknown, but at least from on or about September 4,
22 2019, through on or about September 13, 2022, in the District of Arizona and elsewhere,
23 the defendant, SAMUEL RAPPYLEE BATEMAN, and others known and unknown to the
24 grand jury, did knowingly and willfully conspire and agree together and with each other,
25 to commit the following offenses against the United States: Persuasion and Coercion, in
26 violation of Title 18, United States Code, Sections 2422(a) and (b), as alleged in Counts 4,
27 5, 7, 8, 14, 15, 17, 18, 19, 21, 22, 25, 26, 27, 30, 31, 33, and 34.

1 physical contact with his minor wives by hugging, kissing, and sleeping with them in the
2 same bed, before ultimately engaging in sexual intercourse with them at a later time.

3 13. Defendant BATEMAN originally resided in Colorado City, Arizona.
4 Traveling between Arizona, Nebraska, Colorado, and Utah, defendant BATEMAN and his
5 co-conspirators began bringing his wives, including minors, back to Colorado City,
6 Arizona. Defendant BATEMAN and his co-conspirators used cellular phones, other
7 electronic devices, electronic communications, the Internet, vehicles, interstate highways,
8 and hotels, to induce, persuade and encourage the minor victims to marry him, travel with
9 and to him, and to engage in sexual activity.

10 14. As part of the conspiracy, defendant BATEMAN and his co-conspirators
11 engaged in sexual activity in the presence of minors. Defendant BATEMAN and his co-
12 conspirators encouraged the minors to participate in the sexual activity and trained them to
13 do so. In one instance, defendant BATEMAN and his co-conspirators engaged in a group
14 sexual activity involving minors, using electronic devices and video communication to
15 facilitate the participation of other co-conspirators and a minor in different states.

16 15. Defendant BATEMAN controlled his followers by insisting they “bear
17 testimony” and make “confessions.” He also “rebuked” them and provided “corrections”
18 when his followers were not obedient to his will. Defendant BATEMAN, his co-
19 conspirators, and many of his followers documented their travel and daily activities in
20 journals, day-planners, and other documents.

21 Overt Acts

22 16. In furtherance of the conspiracy, and to effect the object of the conspiracy,
23 the following overt acts, among others, were committed in the District of Arizona and
24 elsewhere:

25 17. On or about September 4, 2019, defendant SAMUEL RAPPYLEE
26 BATEMAN traveled from Colorado City, Arizona, to Rifle, Colorado, to take the first of
27 M.J.’s adult daughters, defendant MARONA JOHNSON, as a wife. Defendant
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1 BATEMAN took defendant MARONA JOHNSON back to Colorado City, Arizona, where
2 he later impregnated her.

3 18. On or about October 26, 2019, after a trip from Colorado City, Arizona, to
4 Lincoln, Nebraska, defendant SAMUEL RAPPYLEE BATEMAN took the second of
5 M.J.'s adult daughters, S.J., as a wife. Defendant BATEMAN took S.J. back to Colorado
6 City, Arizona, where he later impregnated her.

7 19. On or about March 26, 2020, defendant SAMUEL RAPPYLEE BATEMAN
8 spoke to M.J. and told him that God gave M.J.'s daughter, Jane Doe 6 (then age 9), to
9 defendant BATEMAN. M.J. responded saying he knew defendant BATEMAN was going
10 to say that.

11 20. On or about May 3, 2020, defendant SAMUEL RAPPYLEE BATEMAN
12 traveled from Colorado City, Arizona, to Lincoln, Nebraska.

13 21. On or about May 3, 2020, at a hospital in Omaha, Nebraska, defendant
14 SAMUEL RAPPYLEE BATEMAN "rebuked" M.J. in front of his family.

15 22. On or about May 3, 2020, M.J. traveled from Omaha, Nebraska, to Lincoln,
16 Nebraska, and told his daughter, Jane Doe 6, that the Lord wanted her to go with defendant
17 SAMUEL RAPPYLEE BATEMAN.

18 23. On or between May 3 and May 5, 2020, defendant SAMUEL RAPPYLEE
19 BATEMAN, Jane Doe 6, and M.J. sat in a van together, and then M.J.'s family was told
20 Jane Doe 6 was going with defendant BATEMAN.

21 24. On or between May 3 and May 5, 2020, defendant SAMUEL RAPPYLEE
22 BATEMAN told M.J. he would be blessed for his loyalty.

23 25. On or about May 4, 2020, defendant SAMUEL RAPPYLEE BATEMAN
24 took Jane Doe 6 (then age 9) as a wife.

25 26. On or between May 4 and May 8, 2020, defendant SAMUEL RAPPYLEE
26 BATEMAN took Jane Doe 6 from Lincoln, Nebraska, to Colorado City, Arizona.

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1 27. On or about May 8, 2020, defendant SAMUEL RAPPYLEE BATEMAN
2 took Jane Doe 6 to St. George, Utah, and had her lay on his lap as he drove.

3 28. On or about May 15, 2020, defendant SAMUEL RAPPYLEE BATEMAN
4 took Jane Doe 6 for a walk to the airport, and they stopped and prayed. They discussed that
5 “the Devil doesn’t like what we are doing.”

6 29. On or about May 16, 2020, defendant SAMUEL RAPPYLEE BATEMAN
7 took Jane Doe 6 for a walk and they knelt and prayed.

8 30. On or between May 19 and August 9, 2020, defendant SAMUEL
9 RAPPYLEE BATEMAN had a video call with his daughter, Jane Doe 1, showed her Jane
10 Doe 6, and introduced Jane Doe 6 as Jane Doe 1’s “new mother.” Defendant BATEMAN
11 told Jane Doe 1 that Jane Doe 6 was nine (9) years old, and that he “married” Jane Doe 6
12 “in full consent of her father.”

13 31. On or between May 19 and August 9, 2020, defendant SAMUEL
14 RAPPYLEE BATEMAN had another video call with his daughter, Jane Doe 1, during
15 which he hugged and kissed Jane Doe 6.

16 32. On or about June 4, 2020, as recorded by defendant SAMUEL RAPPYLEE
17 BATEMAN, he chastened Jane Doe 6 “quite hard today because she wouldn’t obey
18 quickly, lingered and lingered until something had to change. After a while, she came
19 weeping and confessing.”

20 33. On or between June 6 and June 7, 2020, defendant SAMUEL RAPPYLEE
21 BATEMAN traveled with Jane Doe 6 from Colorado City, Arizona, to Lincoln, Nebraska.

22 34. On or about June 20, 2020, as recorded by defendant SAMUEL RAPPYLEE
23 BATEMAN, M.J. had been “laboring” with defendant MORETTA ROSE JOHNSON
24 (then age 17), and she voiced “she wants to do Heavenly Father’s will and asked her father
25 [M.J.] to help her.”

26 35. On or about June 28, 2020, defendant SAMUEL RAPPYLEE BATEMAN
27 returned from Lincoln, Nebraska, to Colorado City, Arizona, with Jane Doe 6.

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1 36. On or about June 28, 2020, defendant SAMUEL RAPPYLEE BATEMAN
2 told S.J. he did not want to see J.J. (defendant MORETTA ROSE JOHNSON’s mother) or
3 defendant MORETTA ROSE JOHNSON.

4 37. On or about June 30, 2020, defendant SAMUEL RAPPYLEE BATEMAN
5 sent a lengthy email to M.J. stating in relevant part: “[m]y heart is offended greatly at [J.J.]
6 and [defendant MORETTA ROSE JOHNSON] for thinking evil of me, thinking I am doing
7 my own thing. They need an example and don’t have one. . . God is so offended at you for
8 the way you have trampled over top of me that He gave me [defendant BRENDA
9 BARLOW] and [defendant DONNAE BARLOW] You can all reject it if you want,
10 see if I care. Your children will fall by the dozens unless you repent in sackcloth and
11 ashes.”

12 38. On or about July 1, 2020, defendant SAMUEL RAPPYLEE BATEMAN
13 wrote in his journal “God seems to whisper ‘[Jane Doe 3]’” (referring to Jane Doe 3, then
14 age 14).

15 39. On or about July 2, 2020, M.J. told defendant SAMUEL RAPPYLEE
16 BATEMAN that “the Lord” told M.J. to give defendant BATEMAN his Toyota van.

17 40. On or about July 4, 2020, defendants BRENDA BARLOW, DONNAE
18 BARLOW, and MORETTA ROSE JOHNSON traveled in M.J.’s Toyota van from
19 Lincoln, Nebraska, to Colorado City, Arizona, to be with defendant SAMUEL
20 RAPPYLEE BATEMAN.

21 41. On or between July 3 and July 4, 2020, defendant SAMUEL RAPPYLEE
22 BATEMAN slept in the same bed with Jane Doe 6, and complained that she wet the bed.

23 42. On or about July 5, 2020, defendant SAMUEL RAPPYLEE BATEMAN
24 introduced his six (6) wives, including Jane Doe 6, to his former wife, L.B.2. He also
25 introduced them to defendant LADELL BISTLINE, JR.

26 43. When, on or about July 13, 2020, Arizona Department of Child Safety
27 (hereinafter “AZ DCS”) personnel visited defendant SAMUEL RAPPYLEE BATEMAN’s
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1 home, defendant BATEMAN initially refused to allow them inside. Defendant
2 BATEMAN was also present when AZ DCS personnel spoke to Jane Doe 6, and he
3 gestured to her whether or not to answer their questions.

4 44. On or about July 14, 2020, AZ DCS contacted Jane Doe 6's mother, A.B.,
5 who was still residing in Lincoln, Nebraska. A.B. justified Jane Doe 6 living with
6 defendant SAMUEL RAPPYLEE BATEMAN in Colorado City, Arizona, by saying Jane
7 Doe 6 (still 9 years of age) was helping care for her sister's baby.

8 45. On or about July 14, 2020, defendant SAMUEL RAPPYLEE BATEMAN
9 took his six wives, including Jane Doe 6, to Jan's Canyon, Utah, where, as recorded by
10 defendant BATEMAN, they had "an amazing experience and lesson that they will
11 remember forever!"

12 46. On or about August 8, 2020, defendant SAMUEL RAPPYLEE BATEMAN
13 traveled to Cedar City, Utah, to meet defendants LADELL BISTLINE, JR. and
14 JOSEPHINE BARLOW BISTLINE and their three (3) children, including Jane Doe 8 (then
15 age 9) and Jane Doe 9 (then age 10). They all traveled from Cedar City, Utah, to Lincoln,
16 Nebraska.

17 47. On or about August 10, 2020, defendant SAMUEL RAPPYLEE BATEMAN
18 conducted training on "the Prayer pamphlet" to M.J.'s family, defendants LADELL
19 BISTLINE, JR. and JOSEPHINE BARLOW BISTLINE, and their three (3) children,
20 including Jane Doe 8 and Jane Doe 9.

21 48. On or between July 1 and August 14, 2020, M.J. encouraged his daughter,
22 Jane Doe 3 (then age 14) to marry defendant SAMUEL RAPPYLEE BATEMAN.

23 49. On or about August 13, 2020, defendant SAMUEL RAPPYLEE BATEMAN
24 met with Jane Doe 3 and listened to her "testimony" of "Uncle Warren coming to her."

25 50. On or between August 13 and August 14, 2020, defendant SAMUEL
26 RAPPYLEE BATEMAN took Jane Doe 3 (then age 14) as a wife.

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1 51. On or about August 17, 2020, defendant SAMUEL RAPPYLEE BATEMAN
2 told M.J. that God told him that M.J.'s daughter, Jane Doe 5 (then age 13), belonged to
3 him (meaning defendant BATEMAN).

4 52. On or about August 18, 2020, M.J. told defendant SAMUEL RAPPYLEE
5 BATEMAN that Jane Doe 5 was ready whenever defendant BATEMAN was.

6 53. On or between August 22 and August 23, 2020, as recorded by defendant
7 SAMUEL RAPPYLEE BATEMAN, he "slept with Angel Mother [Jane Doe 3] tonight!"

8 54. On or between August 18 and August 31, 2020, defendant SAMUEL
9 RAPPYLEE BATEMAN took Jane Doe 5 (then age 13) as a wife.

10 55. On or about September 5, 2020, defendant SAMUEL RAPPYLEE
11 BATEMAN and M.J. agreed that defendant BATEMAN would move into M.J.'s house in
12 Lincoln, Nebraska, with all his wives and take M.J.'s bedroom.

13 56. On or about September 25, 2020, as recorded by defendant SAMUEL
14 RAPPYLEE BATEMAN, he "got after" Jane Doe 3 and Jane Doe 5 "quite firmly for
15 saying they wanted to be single again," until they both confessed to his satisfaction.

16 57. On or about September 27, 2020, as recorded by defendant SAMUEL
17 RAPPYLEE BATEMAN, he told M.J. that God told defendant BATEMAN that M.J.'s
18 daughter, Jane Doe 4 (then age 10), "should be by my side."

19 58. On or about September 29, 2020, defendant SAMUEL RAPPYLEE
20 BATEMAN took Jane Doe 4 (then age 10) as a wife.

21 59. On or about September 29, 2020, defendant SAMUEL RAPPYLEE
22 BATEMAN drove with M.J., J.J. and their daughter, Jane Doe 4, and defendant
23 BATEMAN kissed Jane Doe 4.

24 60. On or between September 29, 2020 and January 31, 2021, defendant
25 SAMUEL RAPPYLEE BATEMAN was "intimate" with someone else in front of Jane
26 Doe 4 (then age 10 or 11).

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1 61. On or between September 29, 2020 and January 31, 2021, in M.J.'s bedroom
2 that had been given to defendant SAMUEL RAPPYLEE BATEMAN, defendant
3 BATEMAN was first "intimate" with Jane Doe 4 in an encounter she described as
4 "definitely terrifying"; there was another girl present.

5 62. On or between September 29, 2020 and March 18, 2021, defendant
6 SAMUEL RAPPYLEE BATEMAN touched Jane Doe 4's (then age 10 to 11) breasts, in
7 front of her mother, J.J., in a vehicle.

8 63. On or about October 24, 2020, in Omaha, Nebraska, M.J. took Jane Doe 7
9 (then age 11) for a drive and asked if she was having bad feelings against defendant
10 SAMUEL RAPPYLEE BATEMAN because she thought she had to marry him. When
11 Jane Doe 7 confirmed this, M.J. assured her not to fear because she was not going to marry
12 defendant BATEMAN. M.J. told Jane Doe 7 that defendant BATEMAN was a prophet
13 and she should pray for forgiveness and not hold bad feelings against defendant
14 BATEMAN anymore.

15 64. On or about October 25, 2020, as recorded by Jane Doe 7, defendant
16 SAMUEL RAPPYLEE BATEMAN sent text messages to his wife, S.J., during Sunday
17 School, about Jane Doe 7, saying "show [Jane Doe 7] this text" and "I see [Jane Doe 7] has
18 made a great effort of improvement," which S.J. showed to Jane Doe 7.

19 65. On or about October 29, 2020, defendant SAMUEL RAPPYLEE
20 BATEMAN took M.J.'s wife, A.B., mother of Jane Doe 5 and Jane Doe 6, as a wife.

21 66. On or about October 29, 2020, as recorded by defendant SAMUEL
22 RAPPYLEE BATEMAN, he "rebuked" one of M.J.'s sons, in front of others, and told him
23 "if he stood up to harm me I would throw him through the wall. And that he had lost an
24 eternal blessing in [Jane Doe 7]. God was going to give her to him but he spit in The Lord's
25 face so He gave her to me."

26 67. On or about October 29, 2020, defendant SAMUEL RAPPYLEE
27 BATEMAN took Jane Doe 7 (then age 11) as a wife.

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1 68. On or about October 29, 2020, as recorded by defendant SAMUEL
2 RAPPYLEE BATEMAN, he took Jane Doe 7 from Lincoln to Omaha, Nebraska, and
3 “rebuked her strongly” when she would not speak. Defendant BATEMAN told Jane Doe
4 7 if she didn’t “want this I would take her back this instant. She repented quickly.”

5 69. On or between October 29, 2020 and January 15, 2021, in Lincoln, Nebraska,
6 defendant SAMUEL RAPPYLEE BATEMAN was “intimate” with Jane Doe 7 (then age
7 11 or 12).

8 70. On or about October 31, 2020, as recorded by defendant SAMUEL
9 RAPPYLEE BATEMAN, he gave defendant BRENDA BARLOW “sacred ordinance (A)
10 training,” the same training received by defendant MARONA JOHNSON “many months
11 ago.”

12 71. On or about November 7, 2020, defendants JOSEPHINE BARLOW
13 BISTLINE and NAOMI BISTLINE married defendant SAMUEL RAPPYLEE
14 BATEMAN.

15 72. On or about November 7, 2020, defendant LADELL BISTLINE, JR. spoke
16 to defendant SAMUEL RAPPYLEE BATEMAN on the phone and told defendant
17 BATEMAN that “The Spirit” told defendant BISTLINE, JR. that he would be “sealed” to
18 defendant BATEMAN.

19 73. On or about November 7, 2020, after defendant SAMUEL RAPPYLEE
20 BATEMAN spoke with defendant LADELL BISTLINE, JR. on the phone, M.J. told
21 defendant BATEMAN that God told M.J. he belonged to defendant BATEMAN as well.

22 74. On or about November 7, 2020, defendant SAMUEL RAPPYLEE
23 BATEMAN called defendants BRENDA BARLOW and MARONA JOHNSON, and M.J.
24 called his wife, J.J., and they all met at a hotel room. Defendant BATEMAN directed
25 everyone to get naked and told M.J. and J.J. to perform sex acts in front of defendants
26 BRENDA BARLOW and MARONA JOHNSON, so that they could learn how to sexually
27 please defendant BATEMAN.

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1 75. On or about November 9, 2020, defendant SAMUEL RAPPYLEE
2 BATEMAN coordinated a “sacred ordinance” to emulate the “Washing of the Feet” in a
3 hotel room in Lincoln, Nebraska. Defendant BATEMAN told everyone to get naked,
4 washed the feet of M.J. and defendant LADELL BISTLINE, Jr., and then claimed he
5 needed to have sex with M.J. to bond with him. When defendant BATEMAN had difficulty
6 getting an erection, he demanded the women and girls assist. J.J. and defendants BRENDA
7 BARLOW and DONNAE BARLOW were there participating, as well as some of the minor
8 wives, including Jane Doe 3.

9 76. On or about November 11, 2020, defendants LADELL BISTLINE, JR. and
10 JOSEPHINE BARLOW BISTLINE visited M.B., mother of Jane Doe 10, in Monument,
11 Colorado, and tried to convince her that defendant SAMUEL RAPPYLEE BATEMAN
12 was doing the will of Warren Jeffs. Defendant BATEMAN then called, and M.B. listened
13 to defendant BATEMAN’s “testimony” that day.

14 77. On or about November 14, 2020, defendants LADELL BISTLINE, JR. and
15 JOSEPHINE BARLOW BISTLINE traveled to Utah, and purchased a white Yukon for
16 defendant SAMUEL RAPPYLEE BATEMAN.

17 78. On or about November 15, 2020, defendant LEILANI BISTLINE allowed
18 her daughter, Jane Doe 11 (then age 14), to listen to defendant SAMUEL RAPPYLEE
19 BATEMAN’s teachings.

20 79. On or between November 17 and November 19, 2020, M.B. sent an
21 electronic communication to her sisters stating that defendant SAMUEL RAPPYLEE
22 BATEMAN is doing “Uncle Warren[’]s will.”

23 80. On or about November 20, 2020, defendants SAMUEL RAPPYLEE
24 BATEMAN and NAOMI BISTLINE left Lincoln, Nebraska, with Jane Doe 3 and others.

25 81. On or about November 21, 2020, defendant SAMUEL RAPPYLEE
26 BATEMAN and his wives stopped in Monument, Colorado, to provide lessons to the
27 Bistline family, including Jane Doe 11.

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1 82. On or about November 23, 2020, defendant LADELL BISTLINE, JR. told a
2 law enforcement officer it was just a rumor that defendant SAMUEL RAPPYLEE
3 BATEMAN married his daughter, Jane Doe 9. During this interaction, defendant
4 BATEMAN's wives were hiding.

5 83. On or about November 23, 2020, in the evening, in Colorado City, Arizona,
6 defendant SAMUEL RAPPYLEE BATEMAN gave Jane Doe 3, and some of his other
7 wives, to defendant LADELL BISTLINE, JR. to comfort him since defendant BATEMAN
8 had taken defendant BISTLINE, JR.'s wife. Defendant BATEMAN also called some of
9 his wives who were in Lincoln, Nebraska to tell them what he had done. Within hours,
10 defendant BATEMAN sent his followers a group text message taking back all of his wives.

11 84. On or about November 24, 2020, defendant LADELL BISTLINE, JR. told
12 law enforcement that he knew defendants JOSEPHINE BARLOW BISTLINE and
13 SAMUEL RAPPYLEE BATEMAN were taking his children, Jane Doe 8 and Jane Doe 9,
14 and that defendants BARLOW BISTLINE and BATEMAN were not married.

15 85. On or about November 24, 2020, defendants SAMUEL RAPPYLEE
16 BATEMAN, NAOMI BISTLINE, and JOSEPHINE BARLOW BISTLINE, took
17 defendant JOSEPHINE BARLOW BISTLINE's daughters, Jane Doe 8 and Jane Doe 9,
18 along with defendant MORETTA ROSE JOHNSON (then age 17) and Jane Doe 3, to
19 Cedar City, Utah, where they were stopped by law enforcement.

20 86. On or about November 24, 2020, LADELL BISTLINE, JR. told law
21 enforcement that he approved of his daughters, Jane Doe 8 and Jane Doe 9, traveling with
22 defendants SAMUEL RAPPYLEE BATEMAN and JOSEPHINE BARLOW BISTLINE.

23 87. On or about November 24, 2020, as recorded by Jane Doe 8, after the law
24 enforcement contact, and when they returned to Colorado City, Arizona, defendant
25 SAMUEL RAPPYLEE BATEMAN held Jane Doe 8's hand and said, "did you know that
26 you belong to me?"

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1 88. On or between November 24, 2020 and August 27, 2022, defendant
2 SAMUEL RAPPYLEE BATEMAN took Jane Doe 8 (then age 9 or 10) as a wife.

3 89. On or about November 24, 2020, after returning to Colorado City, Arizona,
4 defendant SAMUEL RAPPYLEE BATEMAN told defendant NAOMI BISTLINE, Z.B.,
5 and Jane Doe 3 to comfort defendant LADELL BISTLINE, JR. in a vehicle.

6 90. On or between November 25 and November 27, 2020, defendant SAMUEL
7 RAPPYLEE BATEMAN coordinated group sexual activity in a hotel room in Colorado
8 Springs, Colorado, with some individuals participating via video call. Defendant
9 BATEMAN told M.J. to have sex with defendant JOSEPHINE BARLOW BISTLINE
10 while defendant BATEMAN had sex with Z.B., who was M.J.'s wife. Defendants NAOMI
11 BISTLINE, MORETTA ROSE JOHNSON (then age 17) and Jane Doe 3 were also present
12 and naked. M.J. initiated a video call with his wives J.J. and P.B. Defendant BATEMAN
13 initiated a video call with defendants MARONA JOHNSON and BRENDA BARLOW,
14 and Jane Doe 6 also participated in the video call. Defendant BATEMAN also initiated a
15 video call with defendant LADELL BISTLINE, JR., who was in Colorado City, Arizona.
16 Defendant BATEMAN told everyone to be undressed so they could be part of it. The video
17 participants, including Jane Doe 6, were naked.

18 91. On or between November 25 and November 27, 2020, in the hotel room in
19 Colorado, Z.B. taught Jane Doe 3 and defendants NAOMI BISTLINE and MORETTA
20 ROSE JOHNSON (then age 17) to "bless" defendant SAMUEL RAPPYLEE BATEMAN
21 and prepare him for sex.

22 92. On or between November 21 and November 28, 2020, defendant SAMUEL
23 RAPPYLEE BATEMAN sent an email to defendant LEIA BISTLINE saying God told
24 him she had something to tell him.

25 93. On or about November 28, 2020, defendant SAMUEL RAPPYLEE
26 BATEMAN sent a group text message informing everyone that defendant LEIA
27 BISTLINE said God told her she belonged in defendant BATEMAN's family.

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1 94. On or between December 3 and December 6, 2020, defendant SAMUEL
2 RAPPYLEE BATEMAN picked up defendant LEIA BISTLINE from Monument,
3 Colorado, to take her back to Lincoln, Nebraska.

4 95. On or about December 5, 2020, defendant SAMUAL RAPPYLEE
5 BATEMAN took defendant LEIA BISTLINE as a wife.

6 96. On or about December 9, 2020, defendant LEILANI BISTLINE brought her
7 daughter, Jane Doe 11, from Monument, Colorado, to Colorado City, Arizona.

8 97. On or between December 20, 2020 and January 1, 2021, defendant SAMUEL
9 RAPPYLEE BATEMAN coordinated another group sexual activity, in a hotel in Lincoln,
10 Nebraska. M.J., J.J., Z.B., G.B., and defendants DONNAE BARLOW, LADELL
11 BISTLINE, JR., MARONA JOHNSON, and BRENDA BARLOW were present, as well
12 as some of the minors. Defendant BATEMAN brought wine and told everyone to get
13 naked. Defendant BATEMAN had sex with M.J., while the women and girls assisted
14 defendant BATEMAN in getting an erection.

15 98. On or about December 21, 2020, defendant SAMUEL RAPPYLEE
16 BATEMAN told M.B.2 (then age 18) she would be banished from eternal salvation if she
17 would not follow him.

18 99. On or about December 25, 2020, defendant SAMUEL RAPPYLEE
19 BATEMAN touched Jane Doe 3's vagina in Lincoln, Nebraska, in her father M.J.'s
20 bedroom that he gave to defendant BATEMAN.

21 100. On or between December 31, 2020 and January 1, 2021, defendant SAMUEL
22 RAPPYLEE BATEMAN "rebuked" his wives and told them to factory reset their phones.

23 101. On or between January 1, 2021 and September 12, 2022, defendant
24 SAMUEL RAPPYLEE BATEMAN was "intimate" with Jane Doe 7 (then age 12 or 13),
25 in Colorado City, Arizona.

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1 102. On or between January 1 and January 17, 2021, defendant SAMUEL
2 RAPPYLEE BATEMAN started moving his wives from Lincoln, Nebraska, to Colorado
3 City, Arizona.

4 103. On or about January 15, 2021, Jane Doe 7 was transported from Lincoln,
5 Nebraska, and arrived in Colorado City, Arizona on January 16, 2021.

6 104. On or about January 18, 2021, defendant SAMUEL RAPPYLEE
7 BATEMAN, with some of his wives and followers, traveled to Lincoln, Nebraska, from
8 Colorado City, Arizona.

9 105. On or between January 1 and March 1, 2021, M.B. and her daughter, Jane
10 Doe 10 (then age 14), moved from Monument, Colorado, to Colorado City, Arizona,
11 around the same time defendant SAMUEL RAPPYLEE BATEMAN and his wives were
12 also moving back to Colorado City, Arizona.

13 106. On or between January 1 and April 30, 2021, defendant SAMUEL
14 RAPPYLEE BATEMAN slept with Jane Doe 10 and multiple wives, including defendants
15 NAOMI BISTLINE and LEIA BISTLINE. Defendant Bateman ordered everyone to take
16 their clothes off and had sex with defendant LEIA BISTLINE in front of and next to Jane
17 Doe 10.

18 107. On or between January 1 and November 1, 2021, defendant SAMUEL
19 RAPPYLEE BATEMAN called M.J. and told him to come over to his house in Colorado
20 City, Arizona. M.J. arrived with his wife, P.B. Defendant JOSEPHINE BARLOW
21 BISTLINE answered the door and took them to defendant BATEMAN's bedroom.
22 Defendants LEIA BISTLINE and JOSEPHINE BARLOW BISTLINE, and Jane Doe 5
23 were all there with defendant BATEMAN and they were all naked. Defendant BATEMAN
24 said the Lord was requiring him to conduct a "sacred ordinance." Defendant BATEMAN
25 said "[defendant LEIA BISTLINE] is with child and the Lord wants you [M.J.] to be with
26 her, and I will be with [P.B.]." Defendant BATEMAN performed sex acts with defendant
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1 LEIA BISTLINE and Jane Doe 5. Defendant BATEMAN touched Jane Doe 5's breasts
2 and vagina.

3 108. On or between January 28 and November 5, 2021, defendant SAMUEL
4 RAPPYLEE BATEMAN took Jane Doe 9 (then age 11) as a wife.

5 109. On or between February 1 and February 13, 2021, defendant SAMUEL
6 RAPPYLEE BATEMAN, moved with his wives and followers to Colorado City, Arizona.

7 110. On or between January 1, 2021 and August 27, 2022, in Colorado City,
8 Arizona, defendant SAMUEL RAPPYLEE BATEMAN had sex with defendant
9 MARONA JOHNSON in front of some of the minor girls, including Jane Doe 11, while
10 some of the girls were touching him.

11 111. On or between January 1, 2021 and August 27, 2022, in the green house, in
12 Colorado City, Arizona, defendant SAMUEL RAPPYLEE BATEMAN engaged in group
13 sexual activity with Jane Doe 3, Jane Doe 4, Jane Doe 7, and Jane Doe 10, and defendants
14 NAOMI BISTLINE, BRENDA BARLOW and LEIA BISTLINE.

15 112. On or about February 21, 2021, M.J. and defendant LADELL BISTLINE,
16 JR. committed to defendant SAMUEL RAPPYLEE BATEMAN on a group call that they
17 had given everything to defendant BATEMAN, whom they referenced as "President
18 Samuel R. Bateman," to include their wives and their children. The call was audio recorded
19 and uploaded to YouTube.

20 113. On or about March 2, 2021, M.J. contacted defendant LEILANI BISTLINE
21 by cell phone, telling her Jane Doe 11 was to receive "training" from defendant LEILANI
22 BISTLINE. As recorded by Jane Doe 11, she went upstairs to defendant SAMUEL
23 RAPPYLEE BATEMAN with defendant LEILANI BISTLINE to dedicate her life to
24 "Father" (defendant SAMUEL RAPPYLEE BATEMAN) and got a "severe correction."

25 114. On or about March 3, 2021, as recorded by Jane Doe 11, she married
26 defendant SAMUEL RAPPYLEE BATEMAN and had "an extreme trying experience."
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1 115. On or about March 4, 2021, as recorded by Jane Doe 11, defendant LEIA
2 BISTLINE took Jane Doe 11 to defendant SAMUEL RAPPYLEE BATEMAN and had a
3 “most dear and precious experience.”

4 116. On or about March 8, 2021, defendant SAMUEL RAPPYLEE BATEMAN
5 asked Jane Doe 10 if she had a testimony of where she was supposed to be.

6 117. On or between March 12 and March 13, 2021, defendant SAMUEL
7 RAPPYLEE BATEMAN took Jane Doe 3, Jane Doe 4, Jane Doe 7, Jane Doe 9, Jane Doe
8 11, defendant NAOMI BISTLINE, and others, back to Lincoln, Nebraska, to pick up Jane
9 Doe 5 and the rest of defendant BATEMAN’s wives and their babies.

10 118. On or about March 15, 2021, in separate vehicles, defendant SAMUEL
11 RAPPYLEE BATEMAN and his wives started traveling back to Colorado City, Arizona,
12 from Lincoln, Nebraska.

13 119. On or about March 16, 2021, defendant BRENDA BARLOW and others
14 decorated the room for S.B. and Jane Doe 10, who were recently married to defendant
15 SAMUEL RAPPYLEE BATEMAN. Defendant BATEMAN arrived in Colorado City,
16 Arizona that night.

17 120. On or about March 17, 2021, defendant SAMUEL RAPPYLEE BATEMAN
18 asked Jane Doe 10 to come to his room. Defendant LEIA BISTLINE brought her into the
19 room where defendant BATEMAN was with some of his other adult wives. The other
20 wives left, but defendant LEIA BISTLINE stayed. Defendant BATEMAN asked if Jane
21 Doe 10 felt left out when she saw other girls touching him. Jane Doe 10 said no, and
22 defendant BATEMAN said she was lying because he could see it in her eyes. Defendant
23 BATEMAN then asked if she wanted to come to him, and she said yes. They hugged and
24 kissed, and defendant BATEMAN told her she kissed just like defendant LEIA BISTLINE.
25 Defendant BATEMAN and Jane Doe 10 laid together and she held his hand, touched his
26 hair, and “touched him” all night long. Jane Doe 10 believed another girl was in bed with
27 them.

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1 121. On or about March 18, 2021, defendant SAMUEL RAPPYLEE BATEMAN
2 woke up Jane Doe 10 by kissing her face all over.

3 122. On or about March 18, 2021, Jane Doe 11, and the people with whom she
4 was traveling, returned to Colorado City, Arizona.

5 123. On or between April 1 and April 30, 2021, defendant SAMUEL RAPPYLEE
6 BATEMAN had sex with Jane Doe 10, while defendant NAOMI BISTLINE, Jane Doe 5,
7 and possibly Jane Doe 7, were present. Jane Doe 5 held Jane Doe 10's hand while defendant
8 BATEMAN was having sex with Jane Doe 10.

9 124. On or between April 1, 2021 and September 12, 2022, defendant SAMUEL
10 RAPPYLEE BATEMAN had anal sex with Jane Doe 10 (then age 14 or 15).

11 125. On or between May 8 and May 11, 2021, defendant SAMUEL RAPPYLEE
12 BATEMAN and his wives moved into the green house in Colorado City, Arizona.

13 126. On or about May 9, 2021, defendant SAMUEL RAPPYLEE BATEMAN
14 married Jane Doe 11's mother, defendant LEILANI BISTLINE.

15 127. On or about May 17, 2021, AZ DCS personnel interviewed defendant
16 LADELL BISTLINE, JR. Defendant BISTLINE, JR. denied there were any concerns
17 regarding his children and sexual abuse. M.J. was present for the interview and interrupted
18 the AZ DCS personnel conducting the interview.

19 128. On or about May 17, 2021, AZ DCS personnel visited defendant
20 JOSEPHINE BARLOW BISTLINE and interviewed her regarding allegations involving
21 her daughters. She denied the allegations and said she did not want to talk to AZ DCS or
22 answer their questions. While AZ DCS was present in the home, they encountered many
23 of defendant SAMUEL RAPPYLEE BATEMAN's wives, many of whom also refused to
24 talk to AZ DCS. AZ DCS personnel also attempted to speak with Jane Doe 8 and Jane
25 Doe 9, but the mothers would not allow AZ DCS personnel to speak alone with the girls
26 and would not allow them to ask certain questions.

1 129. On or about June 21, 2021, defendant SAMUEL RAPPYLEE BATEMAN
2 sent a group message to his wives and followers that he would not go to the blue house
3 until J.J. stops “bitching.”

4 130. On or about June 29, 2021, as recorded by Jane Doe 10, defendant SAMUEL
5 RAPPYLEE BATEMAN took Jane Doe 10 for a ride to the creek, where they “worshipped
6 our God in an unexpressable way” and had “holy sex.”

7 131. On or about August 1, 2021, defendant SAMUEL RAPPYLEE BATEMAN
8 made J.J. and Jane Doe 6 watch defendant BATEMAN have sex with J.J.’s daughters,
9 defendant MARONA JOHNSON and S.J., so Jane Doe 6 could learn how to have sex.

10 132. On or between August 1, 2021 and August 9, 2022, in the green house in
11 Colorado City, Arizona, defendant SAMUEL RAPPYLEE BATEMAN first had sex with
12 Jane Doe 6 (then between ages 10 and 12), in front of Jane Doe 10 (then between ages 14
13 and 15), and it looked painful.

14 133. On or between August 1, 2021 and September 12, 2022, defendant SAMUEL
15 RAPPYLEE BATEMAN admitted to M.J. that he had anal sex with M.J.’s daughter, Jane
16 Doe 6 (then between ages 10 and 12).

17 134. On or between August 1 and August 31, 2021, defendant SAMUEL
18 RAPPYLEE BATEMAN took Jane Doe 3 (then age 15) to Pigeon Canyon, Arizona, for
19 their anniversary. They had sex, and she described that defendant BATEMAN would put
20 his penis inside of her and then pull it out because he didn’t want to get her pregnant.

21 135. On or about September 7, 2021, as recorded by Jane Doe 10, defendant
22 SAMUEL RAPPYLEE BATEMAN “slept” with Jane Doe 10 (then age 15).

23 136. On or between October 18 and October 19, 2021, defendant TORRANCE
24 BISTLINE purchased a Bentley for defendant BATEMAN.

25 137. On or about November 1, 2021, defendant SAMUEL RAPPYLEE
26 BATEMAN gave Jane Doe 7 (then age 12) to defendant TORRANCE BISTLINE and
27 watched him have anal sex with her. Defendant BATEMAN also gave defendant LEIA
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1 BISTLINE to M.J. and watched them have sex. Defendant BATEMAN gave defendant
2 NAOMI BISTLINE to defendant LADELL BISTLINE, JR. and watched them have sex.
3 Later, defendant BATEMAN announced what happened to all of his followers and
4 explained that it was an “atonement” requiring him to sacrifice his most precious
5 possessions.

6 138. On or about November 5, 2021, defendants SAMUEL RAPPYLEE
7 BATEMAN, NAOMI BISTLINE and TORRANCE BISTLINE went to Salt Lake City,
8 Utah, to pick up the second Bentley defendant TORRANCE BISTLINE purchased for
9 defendant BATEMAN.

10 139. On or about November 13, 2021, defendant SAMUEL RAPPYLEE
11 BATEMAN and other(s) went to Salt Lake City, Utah, to pick up two Range Rovers, one
12 of which was purchased by defendant LADELL BISTLINE, JR.

13 140. On or about January 29, 2022, defendant SAMUEL RAPPYLEE
14 BATEMAN took M.B.2, S.B., defendant LEIA BISTLINE, and Jane Doe 10 (then age 15)
15 to a hotel room in Colorado. Defendant BATEMAN wanted M.B.2 to sleep with him, but
16 she refused. He slept with Jane Doe 10 under a blanket and touched her vagina. Jane Doe
17 10 said it was not sex, but it kind of felt like it.

18 141. On or about February 16, 2022, as recorded by Jane Doe 9, defendant
19 SAMUEL RAPPYLEE BATEMAN traveled with Jane Doe 9 (then age 12) and others to
20 Las Vegas, Nevada, where they stayed in a hotel. Defendant BATEMAN “slept” with Jane
21 Doe 9.

22 142. On or about April 15, 2022, defendant SAMUEL RAPPYLEE BATEMAN
23 told M.B.2 to move her office to the blue house (John’s) and not come to the green house
24 (Roy’s) because defendant BATEMAN needed to teach and train his family.

25 143. On or between July 1 and September 12, 2022, defendant SAMUEL
26 RAPPYLEE BATEMAN had sex with Jane Doe 3 (then age 16), at campsites they visited
27 that summer, including one in Apple Valley, Utah.

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1 144. On or about August 28, 2022, defendant SAMUEL RAPPYLEE BATEMAN
2 was driving on the highway in Arizona with Jane Doe 4, Jane Doe 7, and Jane Doe 8 in an
3 attached box trailer. Defendants BATEMAN, NAOMI BISTLINE, and MARONA
4 JOHNSON, and Jane Doe 9 and Jane Doe 10 (sitting in the passenger compartment) were
5 pulled over by Arizona Department of Public Safety. Defendant BATEMAN was arrested
6 and his cell phone was seized.

7 145. On or about August 28, 2022, defendant SAMUEL RAPPYLEE BATEMAN
8 called defendant TORRANCE BISTLINE from custody and told him to delete his Signal
9 account, after defendant BATEMAN's phone was seized by law enforcement.

10 146. On or about August 28, 2022, defendant SAMUEL RAPPYLEE BATEMAN
11 called his wives and instructed defendant BRENDA BARLOW to delete his Signal account
12 and every message "right now," which the wives confirmed they were doing "right now."

13 147. On or about September 2, 2022, after defendant SAMUEL RAPPYLEE
14 BATEMAN was released on bond from state custody, defendant BATEMAN inquired how
15 he could factory reset his phone.

16 148. On or between September 2 and September 12, 2022, as described by Jane
17 Doe 10, defendant SAMUEL RAPPYLEE BATEMAN had sex with Jane Doe 5 (then age
18 15) in front of Jane Doe 10 (then age 15), and this was the first time Jane Doe 10 saw
19 defendant BATEMAN use a condom.

20 149. On or about September 12, 2022, in a trailer in Utah, defendant SAMUEL
21 RAPPYLEE BATEMAN had sex with Jane Doe 10, while defendant BRENDA BARLOW
22 helped by touching defendant BATEMAN.

23 150. On the morning of September 13, 2022, defendant BRENDA BARLOW,
24 Jane Doe 10, and Jane Doe 9 (then age 12) went back to the trailer in Utah, where defendant
25 SAMUEL RAPPYLEE BATEMAN had stayed the night before with Jane Doe 10 and
26 defendant BRENDA BARLOW. When they learned the FBI was in Colorado City,
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1 Arizona, defendant BRENDA BARLOW hid defendant SAMUEL RAPPYLEE
2 BATEMAN's tablet and computer, as well as the keys to the trailer.

3 151. On or about September 13, 2022, defendant NAOMI BISTLINE threw a
4 backpack full of condoms, digital devices, and other items out a window in an attempt to
5 hide it during execution of a federal search warrant at their home.

6 152. Beginning on a date unknown through December 1, 2022, defendant
7 SAMUEL RAPPYLEE BATEMAN instructed his minor wives what to say if they were
8 ever interviewed.

9 153. All in violation of Title 18, United States Code, Section 371.

10 **COUNT 2**

11 154. The allegations contained in all preceding paragraphs are realleged and
12 incorporated herein as if fully set forth in this paragraph.

13 155. Beginning at a time unknown, but at least from on or about September 4,
14 2019 through on or about September 13, 2022, in the District of Arizona and elsewhere,
15 the defendant, SAMUEL RAPPYLEE BATEMAN, and others known and unknown to the
16 grand jury, did knowingly and willfully conspire and agree together and with each other,
17 to knowingly transport, and cause to be transported, an individual who had not attained the
18 age of 18 years, to wit: Jane Doe 6, Jane Doe 3, Jane Doe 5, Jane Doe 4, Jane Doe 7, Jane
19 Doe 9, Jane Doe 8, Jane Doe 11, and Jane Doe 10, in interstate commerce, with the intent
20 that such individual engage in sexual activity for which any person can be charged with a
21 criminal offense, in violation of Title 18, United States Code, Sections 2423(a) and 2.

22 156. All in violation of Title 18, United States Code, Section 2423(e).

23 **COUNT 3**

24 157. The allegations contained in all preceding paragraphs are realleged and
25 incorporated herein as if fully set forth in this paragraph.

26 158. Beginning at a time unknown, but at least from on or about September 4,
27 2019 through on or about September 13, 2022, in the District of Arizona and elsewhere,
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1 the defendant SAMUEL RAPPYLEE BATEMAN, and others known and unknown to the
2 grand jury, did knowingly and willfully conspire and agree together and with each other,
3 to knowingly travel in interstate commerce for the purpose of engaging in any illicit sexual
4 conduct, as defined in Title 18, United States Code, Section 2423(f), with another person,
5 to wit: Jane Doe 3, Jane Doe 4, Jane Doe 5, Jane Doe 7, and Jane Doe 10, in violation of
6 Title 18, United States Code, Sections 2423(b) and 2.

7 159. All in violation of Title 18, United States Code, Section 2423(e).

8 **COUNT 4**

9 160. The allegations contained in all preceding paragraphs are realleged and
10 incorporated herein as if fully set forth in this paragraph.

11 161. On or between March 26 and May 8, 2020, in the District of Arizona, and
12 elsewhere, the defendant, SAMUEL RAPPYLEE BATEMAN, and others known and
13 unknown to the grand jury, did knowingly persuade, induce, entice, and coerce Jane Doe
14 6 to travel in interstate commerce, from Nebraska to Arizona, to engage in sexual activity
15 for which any person can be charged with a criminal offense, namely, Sexual Conduct with
16 a Minor, which was a criminal offense under Arizona Revised Statute 13-1405;
17 Molestation of a Child, which was a criminal offense under Arizona Revised Statute 13-
18 1410; and Sexual Abuse, which was a criminal offense under Arizona Revised Statute 13-
19 1404.

20 162. In violation of Title 18, United States Code, Sections 2422(a) and 2.

21 **COUNT 5**

22 163. The allegations contained in all preceding paragraphs are realleged and
23 incorporated herein as if fully set forth in this paragraph.

24 164. On or between March 26, 2020 and September 13, 2022, in the District of
25 Arizona and elsewhere, the defendant, SAMUEL RAPPYLEE BATEMAN, and others
26 known and unknown to the grand jury, did use a facility and means of interstate commerce
27 to knowingly persuade, induce, entice, and coerce Jane Doe 6, who had not attained the
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1 age of 18 years, to engage in sexual activity for which any person can be charged with a
2 criminal offense, namely, Sexual Conduct with a Minor, which was a criminal offense
3 under Arizona Revised Statute 13-1405; Molestation of a Child, which was a criminal
4 offense under Arizona Revised Statute 13-1410; and Sexual Abuse, which was a criminal
5 offense under Arizona Revised Statute 13-1404.

6 165. In violation of Title 18, United States Code, Sections 2422(b) and 2.

7 **COUNT 6**

8 166. The allegations contained in all preceding paragraphs are realleged and
9 incorporated herein as if fully set forth in this paragraph.

10 167. On or between May 5 and May 8, 2020, in the District of Arizona and
11 elsewhere, the defendant, SAMUEL RAPPYLEE BATEMAN, and others known and
12 unknown to the grand jury, did knowingly transport, from Nebraska to Arizona, Jane Doe
13 6, who had not attained the age of 18 years, in interstate commerce, with the intent that
14 such individual engage in sexual activity for which any person can be charged with a
15 criminal offense, namely, Sexual Conduct with a Minor, which was a criminal offense
16 under Arizona Revised Statute 13-1405; Molestation of a Child, which was a criminal
17 offense under Arizona Revised Statute 13-1410; and Sexual Abuse, which was a criminal
18 offense under Arizona Revised Statute 13-1404.

19 168. In violation of Title 18, United States Code, Sections 2423(a) and 2.

20 **COUNT 7**

21 169. The allegations contained in all preceding paragraphs are realleged and
22 incorporated herein as if fully set forth in this paragraph.

23 170. On or between July 1, 2020 and March 18, 2021, in the District of Arizona
24 and elsewhere, the defendant, SAMUEL RAPPYLEE BATEMAN, and others known and
25 unknown to the grand jury, did knowingly persuade, induce, entice, and coerce Jane Doe
26 3 to travel in interstate commerce, back and forth from Nebraska to Arizona, to engage in
27 sexual activity for which any person can be charged with a criminal offense, namely,
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1 Sexual Assault of a Child in the Third Degree, which was a criminal offense under
2 Nebraska Revised Statute 28-320.01; Sexual Conduct with a Minor, which was a criminal
3 offense under Arizona Revised Statute 13-1405; Molestation of a Child, which was a
4 criminal offense under Arizona Revised Statute 13-1410 (through April 14, 2021); Sexual
5 Abuse, which was a criminal offense under Arizona Revised Statute 13-1404 (through
6 April 14, 2021); Production of Child Pornography, which was a criminal offense under
7 Title 18, United States Code, Section 2251(a); Sexual Abuse of a Minor in the First Degree,
8 which was a criminal offense under Wyoming Statute 6-2-314(a)(iii); Sexual Abuse of a
9 Minor in the Second Degree, which was a criminal offense under Wyoming Statute 6-2-
10 315(a)(i) and (iv); and Sexual Abuse of a Minor in the Third Degree, which was a criminal
11 offense under Wyoming Statute 6-2-316(a)(i) and (iv).

12 171. In violation of Title 18, United States Code, Sections 2422(a) and 2.

13 **COUNT 8**

14 172. The allegations contained in all preceding paragraphs are realleged and
15 incorporated herein as if fully set forth in this paragraph.

16 173. On or between July 1, 2020 and September 13, 2022, in the District of
17 Arizona and elsewhere, the defendant, SAMUEL RAPPYLEE BATEMAN, and others
18 known and unknown to the grand jury, did use a facility and means of interstate commerce
19 to knowingly persuade, induce, entice, and coerce Jane Doe 3, who had not attained the
20 age of 18 years, to engage in sexual activity for which any person can be charged with a
21 criminal offense, namely, Sexual Assault of a Child in the Third Degree, which was a
22 criminal offense under Nebraska Revised Statute 28-320.01 (through April 14, 2021);
23 Sexual Conduct with a Minor, which was a criminal offense under Arizona Revised Statute
24 13-1405; Molestation of a Child, which was a criminal offense under Arizona Revised
25 Statute 13-1410 (through April 14, 2021); Sexual Abuse, which was a criminal offense
26 under Arizona Revised Statute 13-1404 (through April 14, 2021); Production of Child
27 Pornography, which was a criminal offense under Title 18, United States Code, Section
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1 2251(a); Sexual Abuse of a Minor in the First Degree, which was a criminal offense under
2 Wyoming Statute 6-2-314(a)(iii) (through April 14, 2022); Sexual Abuse of a Minor in the
3 Second Degree, which was a criminal offense under Wyoming Statute 6-2-315(a)(i) and
4 (iv) (through April 14, 2022); and Sexual Abuse of a Minor in the Third Degree, which
5 was a criminal offense under Wyoming Statute 6-2-316(a)(i) (through April 14, 2022) and
6 (iv).

7 174. In violation of Title 18, United States Code, Sections 2422(b) and 2.

8 **COUNT 9**

9 175. The allegations contained in all preceding paragraphs are realleged and
10 incorporated herein as if fully set forth in this paragraph.

11 176. On or between November 20, 2020 and March 18, 2021, in the District of
12 Arizona and elsewhere, the defendant, SAMUEL RAPPYLEE BATEMAN, and others
13 known and unknown to the grand jury, did knowingly transport, and cause to be
14 transported, Jane Doe 3, who had not attained the age of 18 years, in interstate commerce,
15 back and forth from Nebraska to Arizona, with the intent that Jane Doe 3 engage in sexual
16 activity for which any person can be charged with a criminal offense, namely, Sexual
17 Assault of a Child in the Third Degree, which was a criminal offense under Nebraska
18 Revised Statute 28-320.01; Sexual Conduct with a Minor, which was a criminal offense
19 under Arizona Revised Statute 13-1405; Molestation of a Child, which was a criminal
20 offense under Arizona Revised Statute 13-1410 (through April 14, 2021); Sexual Abuse,
21 which was a criminal offense under Arizona Revised Statute 13-1404 (through April 14,
22 2021); Production of Child Pornography, which was a criminal offense under Title 18,
23 United States Code, Section 2251(a); Sexual Abuse of a Minor in the First Degree, which
24 was a criminal offense under Wyoming Statute 6-2-314(a)(iii) (through April 14, 2022);
25 Sexual Abuse of a Minor in the Second Degree, which was a criminal offense under
26 Wyoming Statute 6-2-315(a)(i) and (iv) (through April 14, 2022); and Sexual Abuse of a
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1 Minor in the Third Degree, which was a criminal offense under Wyoming Statute 6-2-
2 316(a)(i) (through April 14, 2022) and (iv).

3 177. In violation of Title 18, United States Code, Sections 2423(a) and 2.

4 **COUNT 10**

5 178. The allegations contained in all preceding paragraphs are realleged and
6 incorporated herein as if fully set forth in this paragraph.

7 179. On or between July 1 and September 12, 2022, in the District of Arizona and
8 elsewhere, the defendant, SAMUEL RAPPYLEE BATEMAN, and others known and
9 unknown to the grand jury, did knowingly transport, and caused to be transported, Jane
10 Doe 3, who had not attained the age of 18 years, in interstate commerce, from Arizona to
11 Utah, with the intent that Jane Doe 3 engage in sexual activity for which any person can be
12 charged with a criminal offense, namely, Unlawful Sexual Conduct with a 16 or 17 Year
13 Old, which was a criminal offense under Utah Code 76-5-401.2.

14 180. In violation of Title 18, United States Code, Sections 2423(a) and 2.

15 **COUNT 11**

16 181. The allegations contained in all preceding paragraphs are realleged and
17 incorporated herein as if fully set forth in this paragraph.

18 182. On or between November 25 and November 27, 2020, in the District of
19 Arizona and elsewhere, the defendants, SAMUEL RAPPYLEE BATEMAN and
20 JOSEPHINE BARLOW BISTLINE, and others known and unknown to the grand jury, did
21 employ, use, persuade, entice, induce and coerce a minor, and did attempt to do so, to
22 engage in any sexually explicit conduct for the purpose of producing any visual depiction
23 of such conduct and for the purpose of transmitting a live visual depiction of such conduct,
24 knowing or having reason to know that the visual depiction would be transported and
25 transmitted using any means and facility of interstate commerce, and in and affecting
26 interstate commerce, and that the visual depiction would be produced and transmitted using
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1 materials that had been mailed, shipped, and transported in and affecting interstate
2 commerce by any means, including by computer.

3 183. In violation of Title 18, United States Code, Sections 2251(a), (e), 2256,
4 and 2.

5 **COUNT 12**

6 184. The allegations contained in all preceding paragraphs are realleged and
7 incorporated herein as if fully set forth in this paragraph.

8 185. On or about November 25 and November 27, 2020, in the District of Arizona
9 and elsewhere, the defendant, LADELL BISTLINE, JR., did knowingly receive and
10 attempt to receive visual depictions that were produced with the use of a minor engaging
11 in sexually explicit conduct and such visual depictions were of such conduct. The visual
12 depictions were in the form of live transmissions that that were distributed using any means
13 or facility of interstate commerce; had been mailed, shipped and transported in and
14 affecting interstate commerce; and contained materials which had been mailed, shipped,
15 and transported, by any means including by computer, in and affecting interstate and
16 foreign commerce.

17 186. In violation of Title 18, United States Code, Sections 2252(a)(2), (b)(1), and
18 2256.

19 **COUNT 13**

20 187. The allegations contained in all preceding paragraphs are realleged and
21 incorporated herein as if fully set forth in this paragraph.

22 188. On or between November 25 and November 27, 2020, in the District of
23 Arizona and elsewhere, the defendants, SAMUEL RAPPYLEE BATEMAN, JOSEPHINE
24 BARLOW BISTLINE, LADELL BISTLINE, JR., BRENDA BARLOW, and MARONA
25 JOHNSON, and others known and unknown to the grand jury, did, by means of interstate
26 commerce, knowingly transfer, and attempt to transfer, obscene matter to another
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1 individual who had not attained the age of 16 years, knowing that the other individual had
2 not attained the age of 16 years.

3 189. In violation of Title 18, United States Code, Sections 1470 and 2.

4 **COUNT 14**

5 190. The allegations contained in all preceding paragraphs are realleged and
6 incorporated herein as if fully set forth in this paragraph.

7 191. On or between August 17, 2020 and March 18, 2021, in the District of
8 Arizona and elsewhere, the defendant, SAMUEL RAPPYLEE BATEMAN, and others
9 known and unknown to the grand jury, did knowingly persuade, induce, entice, and coerce
10 Jane Doe 5 to travel in interstate commerce, from Nebraska to Arizona, to engage in sexual
11 activity for which any person can be charged with a criminal offense, namely, Sexual
12 Conduct with a Minor, which was a criminal offense under Arizona Revised Statute 13-
13 1405; Molestation of a Child, which was a criminal offense under Arizona Revised Statute
14 13-1410 (through May 23, 2022); and Sexual Abuse, which was a criminal offense under
15 Arizona Revised Statute 13-1404 (through May 23, 2022).

16 192. In violation of Title 18, United States Code, Sections 2422(a) and 2.

17 **COUNT 15**

18 193. The allegations contained in all preceding paragraphs are realleged and
19 incorporated herein as if fully set forth in this paragraph.

20 194. On or between January 1, 2021 and September 13, 2022, in the District of
21 Arizona and elsewhere, the defendant, SAMUEL RAPPYLEE BATEMAN, and others
22 known and unknown to the grand jury, did use a facility and means of interstate commerce
23 to knowingly persuade, induce, entice, and coerce Jane Doe 5, who had not attained the
24 age of 18 years, to engage in sexual activity for which any person can be charged with a
25 criminal offense, namely, Sexual Assault of a Child in the Third Degree, which was a
26 criminal offense under Nebraska Revised Statute 28-320.01 (through May 23, 2022);
27 Sexual Conduct with a Minor, which was a criminal offense under Arizona Revised Statute
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1 13-1405; Molestation of a Child, which was a criminal offense under Arizona Revised
2 Statute 13-1410 (through May 23, 2022); and Sexual Abuse, which was a criminal offense
3 under Arizona Revised Statute 13-1404 (through May 23, 2022).

4 195. In violation of Title 18, United States Code, Sections 2422(b) and 2.

5 **COUNT 16**

6 196. The allegations contained in all preceding paragraphs are realleged and
7 incorporated herein as if fully set forth in this paragraph.

8 197. On or between January 1 and March 18, 2021, in the District of Arizona and
9 elsewhere, the defendant, SAMUEL RAPPYLEE BATEMAN, and others known and
10 unknown to the grand jury, did knowingly transport, and cause to be transported, Jane Doe
11 5, who had not attained the age of 18 years, in interstate commerce, from Nebraska to
12 Arizona, with the intent that Jane Doe 5 engage in sexual activity for which any person can
13 be charged with a criminal offense, namely, Sexual Conduct with a Minor, which was a
14 criminal offense under Arizona Revised Statute 13-1405; Molestation of a Child, which
15 was a criminal offense under Arizona Revised Statute 13-1410 (through May 23, 2022);
16 and Sexual Abuse, which was a criminal offense under Arizona Revised Statute 13-1404
17 (through May 23, 2022).

18 198. In violation of Title 18, United States Code, Sections 2423(a) and 2.

19 **COUNT 17**

20 199. The allegations contained in all preceding paragraphs are realleged and
21 incorporated herein as if fully set forth in this paragraph.

22 200. On or between January 1, 2021 and May 23, 2022, in the District of Arizona
23 and elsewhere, the defendants, SAMUEL RAPPYLEE BATEMAN, JOSEPHINE
24 BARLOW BISTLINE, and LEIA BISTLINE, and others known and unknown to the grand
25 jury, did use a facility and means of interstate commerce to knowingly persuade, induce,
26 entice, and coerce Jane Doe 5, who had not attained the age of 18 years, to engage in sexual
27 activity for which any person can be charged with a criminal offense, namely, Molestation
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1 of a Child, which was a criminal offense under Arizona Revised Statute 13-1410; and
2 Sexual Abuse, which was a criminal offense under Arizona Revised Statute 13-1404.

3 201. In violation of Title 18, United States Code, Sections 2422(b) and 2.

4 **COUNT 18**

5 202. The allegations contained in all preceding paragraphs are realleged and
6 incorporated herein as if fully set forth in this paragraph.

7 203. On or between September 27, 2020 and March 18, 2021, in the District of
8 Arizona and elsewhere, the defendant, SAMUEL RAPPYLEE BATEMAN, and others
9 known and unknown to the grand jury, did knowingly persuade, induce, entice, and coerce
10 Jane Doe 4 to travel in interstate commerce, back and forth from Nebraska to Arizona, to
11 engage in sexual activity for which any person can be charged with a criminal offense,
12 namely, Sexual Assault of a Child in the First Degree, which was a criminal offense under
13 Nebraska Revised Statute 28-319.01; Sexual Assault of a Child in the Third Degree, which
14 was a criminal offense under Nebraska Revised Statute 28-320.01; Sexual Conduct with a
15 Minor, which was a criminal offense under Arizona Revised Statute 13-1405; Molestation
16 of a Child, which was a criminal offense under Arizona Revised Statute 13-1410; and
17 Sexual Abuse, which was a criminal offense under Arizona Revised Statute 13-1404.

18 204. In violation of Title 18, United States Code, Sections 2422(a) and 2.

19 **COUNT 19**

20 205. The allegations contained in all preceding paragraphs are realleged and
21 incorporated herein as if fully set forth in this paragraph.

22 206. On or between September 29, 2020 and September 13, 2022, in the District
23 of Arizona and elsewhere, the defendant, SAMUEL RAPPYLEE BATEMAN, and others
24 known and unknown to the grand jury, did use a facility and means of interstate commerce
25 to knowingly persuade, induce, entice, and coerce Jane Doe 4, who had not attained the
26 age of 18 years, to engage in sexual activity for which any person can be charged with a
27 criminal offense, namely, Sexual Assault of a Child in the First Degree, which was a
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1 criminal offense under Nebraska Revised Statute 28-319.01; Sexual Assault of a Child in
2 the Third Degree, which was a criminal offense under Nebraska Revised Statute 28-320.01;
3 Sexual Conduct with a Minor, which was a criminal offense under Arizona Revised Statute
4 13-1405; Molestation of a Child, which was a criminal offense under Arizona Revised
5 Statute 13-1410; and Sexual Abuse, which was a criminal offense under Arizona Revised
6 Statute 13-1404.

7 207. In violation of Title 18, United States Code, Sections 2422(b) and 2.

8 **COUNT 20**

9 208. The allegations contained in all preceding paragraphs are realleged and
10 incorporated herein as if fully set forth in this paragraph.

11 209. On or between January 15 and March 18, 2021, in the District of Arizona and
12 elsewhere, the defendant, SAMUEL RAPPYLEE BATEMAN, and others known and
13 unknown to the grand jury, did knowingly transport, and cause to be transported, Jane Doe
14 4, who had not attained the age of 18 years, in interstate commerce, back and forth from
15 Nebraska to Arizona, with the intent that Jane Doe 4 engage in sexual activity for which
16 any person can be charged with a criminal offense, namely, Sexual Assault of a Child in
17 the First Degree, which was a criminal offense under Nebraska Revised Statute 28-319.01;
18 Sexual Assault of a Child in the Third Degree, which was a criminal offense under
19 Nebraska Revised Statute 28-320.01; Sexual Conduct with a Minor, which was a criminal
20 offense under Arizona Revised Statute 13-1405; Molestation of a Child, which was a
21 criminal offense under Arizona Revised Statute 13-1410; and Sexual Abuse, which was a
22 criminal offense under Arizona Revised Statute 13-1404.

23 210. In violation of Title 18, United States Code, Sections 2423(a) and 2.

24 **COUNT 21**

25 211. The allegations contained in all preceding paragraphs are realleged and
26 incorporated herein as if fully set forth in this paragraph.

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COUNT 23

217. The allegations contained in all preceding paragraphs are realleged and incorporated herein as if fully set forth in this paragraph.

218. On or between January 15 and March 18, 2021, in the District of Arizona and elsewhere, the defendant, SAMUEL RAPPYLEE BATEMAN, and others known and unknown to the grand jury, did knowingly transport, and cause to be transported, Jane Doe 7, who had not attained the age of 18 years, in interstate commerce, back and forth from Nebraska to Arizona, with the intent that Jane Doe 7 engage in sexual activity for which any person can be charged with a criminal offense, namely, Sexual Assault of a Child in the Third Degree, which was a criminal offense under Nebraska Revised Statute 28-320.01; Sexual Conduct with a Minor, which was a criminal offense under Arizona Revised Statute 13-1405; Molestation of a Child, which was a criminal offense under Arizona Revised Statute 13-1410; and Sexual Abuse, which was a criminal offense under Arizona Revised Statute 13-1404.

219. In violation of Title 18, United States Code, Sections 2423(a) and 2.

COUNT 24

220. The allegations contained in all preceding paragraphs are realleged and incorporated herein as if fully set forth in this paragraph.

221. On or between August 8 and August 9, 2020, in the District of Arizona and elsewhere, the defendant SAMUEL RAPPYLEE BATEMAN, and others known and unknown to the grand jury, did knowingly travel in interstate commerce, from Arizona to Nebraska, for the purpose of engaging in any illicit sexual conduct, as defined in Title 18, United States Code, Section 2423(f), with Jane Doe 3, Jane Doe 4, Jane Doe 5, and Jane Doe 7.

222. In violation of Title 18, United States Code, Sections 2423(b) and 2.

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COUNT 25

223. The allegations contained in all preceding paragraphs are realleged and incorporated herein as if fully set forth in this paragraph.

224. On or about November 1, 2021, in the District of Arizona and elsewhere, the defendants, SAMUEL RAPPYLEE BATEMAN, LEIA BISTLINE, and TORRANCE BISTLINE, and others known and unknown to the grand jury, did use a facility and means of interstate commerce to knowingly persuade, induce, entice, and coerce Jane Doe 7, who had not attained the age of 18 years, to engage in sexual activity for which any person can be charged with a criminal offense, namely, Sexual Conduct with a Minor, which was a criminal offense under Arizona Revised Statute 13-1405; Molestation of a Child, which was a criminal offense under Arizona Revised Statute 13-1410; and Sexual Abuse, which was a criminal offense under Arizona Revised Statute 13-1404.

225. In violation of Title 18, United States Code, Sections 2422(b) and 2.

COUNT 26

226. The allegations contained in all preceding paragraphs are realleged and incorporated herein as if fully set forth in this paragraph.

227. On or between August 8, 2020 and March 18, 2021, in the District of Arizona and elsewhere, the defendants, SAMUEL RAPPYLEE BATEMAN, JOSEPHINE BARLOW BISTLINE, and LADELL BISTLINE, JR., and others known and unknown to the grand jury, did knowingly persuade, induce, entice, and coerce Jane Doe 9 to travel in interstate commerce, back and forth between Arizona, Utah, and Nebraska, to engage in sexual activity for which any person can be charged with a criminal offense, namely, Sexual Conduct with a Minor, which was a criminal offense under Arizona Revised Statute 13-1405; Molestation of a Child, which was a criminal offense under Arizona Revised Statute 13-1410; and Sexual Abuse, which was a criminal offense under Arizona Revised Statute 13-1404.

228. In violation of Title 18, United States Code, Sections 2422(a) and 2.

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COUNT 27

229. The allegations contained in all preceding paragraphs are realleged and incorporated herein as if fully set forth in this paragraph.

230. On or between August 8, 2020 and September 13, 2022, in the District of Arizona and elsewhere, the defendants, SAMUEL RAPPYLEE BATEMAN, JOSEPHINE BARLOW BISTLINE, and LADELL BISTLINE, JR., and others known and unknown to the grand jury, did use a facility and means of interstate commerce to knowingly persuade, induce, entice, and coerce Jane Doe 9, who had not attained the age of 18 years, to engage in sexual activity for which any person can be charged with a criminal offense, namely, Sexual Conduct with a Minor, which was a criminal offense under Arizona Revised Statute 13-1405; Molestation of a Child, which was a criminal offense under Arizona Revised Statute 13-1410; and Sexual Abuse, which was a criminal offense under Arizona Revised Statute 13-1404.

231. In violation of Title 18, United States Code, Sections 2422(b) and 2.

COUNT 28

232. The allegations contained in all preceding paragraphs are realleged and incorporated herein as if fully set forth in this paragraph.

233. On or between August 8, 2020 and March 18, 2021, in the District of Arizona and elsewhere, the defendants, SAMUEL RAPPYLEE BATEMAN, JOSEPHINE BARLOW BISTLINE, and LADELL BISTLINE, JR., and others known and unknown to the grand jury, did knowingly transport, and cause to be transported, Jane Doe 9, who had not attained the age of 18 years, in interstate commerce, back and forth between Arizona, Utah, and Nebraska, with the intent that Jane Doe 9 engage in sexual activity for which any person can be charged with a criminal offense, namely, Sexual Conduct with a Minor, which was a criminal offense under Arizona Revised Statute 13-1405; Molestation of a

1 Child, which was a criminal offense under Arizona Revised Statute 13-1410; and Sexual
2 Abuse, which was a criminal offense under Arizona Revised Statute 13-1404.

3 234. In violation of Title 18, United States Code, Sections 2423(a) and 2.

4 **COUNT 29**

5 235. The allegations contained in all preceding paragraphs are realleged and
6 incorporated herein as if fully set forth in this paragraph.

7 236. On or about February 16, 2022, in the District of Arizona and elsewhere, the
8 defendant, SAMUEL RAPPYLEE BATEMAN, and others known and unknown to the
9 grand jury, did knowingly transport, and cause to be transported, Jane Doe 9, who had not
10 attained the age of 18 years, in interstate commerce, from Arizona to Nevada, with the
11 intent that Jane Doe 9 engage in sexual activity for which any person can be charged with
12 a criminal offense, namely, Sexual Assault, which was a criminal offense under Nevada
13 Revised Statute 200.366; and Lewdness with a Child, which was a criminal offense under
14 Nevada Revised Statute 201.230.

15 237. In violation of Title 18, United States Code, Sections 2423(a) and 2.

16 **COUNT 30**

17 238. The allegations contained in all preceding paragraphs are realleged and
18 incorporated herein as if fully set forth in this paragraph.

19 239. On or between August 8, 2020 and March 18, 2021, in the District of Arizona
20 and elsewhere, the defendants, SAMUEL RAPPYLEE BATEMAN, JOSEPHINE
21 BARLOW BISTLINE, and LADELL BISTLINE, JR., and others known and unknown to
22 the grand jury, did knowingly persuade, induce, entice, and coerce Jane Doe 8 to travel in
23 interstate commerce, back and forth between Arizona, Utah, and Nebraska, to engage in
24 sexual activity for which any person can be charged with a criminal offense, namely,
25 Sexual Conduct with a Minor, which was a criminal offense under Arizona Revised Statute
26 13-1405; Molestation of a Child, which was a criminal offense under Arizona Revised
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1 Statute 13-1410; and Sexual Abuse, which was a criminal offense under Arizona Revised
2 Statute 13-1404.

3 240. In violation of Title 18, United States Code, Sections 2422(a) and 2.

4 **COUNT 31**

5 241. The allegations contained in all preceding paragraphs are realleged and
6 incorporated herein as if fully set forth in this paragraph.

7 242. On or between August 8, 2020 and September 13, 2022, in the District of
8 Arizona and elsewhere, the defendants, SAMUEL RAPPYLEE BATEMAN, JOSEPHINE
9 BARLOW BISTLINE, and LADELL BISTLINE, JR., and others known and unknown to
10 the grand jury, did use a facility and means of interstate commerce to knowingly persuade,
11 induce, entice, and coerce Jane Doe 8, who had not attained the age of 18 years, to engage
12 in sexual activity for which any person can be charged with a criminal offense, namely,
13 Sexual Conduct with a Minor, which was a criminal offense under Arizona Revised Statute
14 13-1405; Molestation of a Child, which was a criminal offense under Arizona Revised
15 Statute 13-1410; and Sexual Abuse, which was a criminal offense under Arizona Revised
16 Statute 13-1404.

17 243. In violation of Title 18, United States Code, Sections 2422(b) and 2.

18 **COUNT 32**

19 244. The allegations contained in all preceding paragraphs are realleged and
20 incorporated herein as if fully set forth in this paragraph.

21 245. On or between August 8, 2020 and March 18, 2021, in the District of Arizona
22 and elsewhere, the defendants, SAMUEL RAPPYLEE BATEMAN, JOSEPHINE
23 BARLOW BISTLINE, and LADELL BISTLINE, JR., and others known and unknown to
24 the grand jury, did knowingly transport, and cause to be transported, Jane Doe 8, who had
25 not attained the age of 18 years, in interstate commerce, back and forth between Arizona,
26 Utah, and Nebraska, with the intent that Jane Doe 8 engage in sexual activity for which
27 any person can be charged with a criminal offense, namely, Sexual Conduct with a Minor,
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1 which was a criminal offense under Arizona Revised Statute 13-1405; Molestation of a
2 Child, which was a criminal offense under Arizona Revised Statute 13-1410; and Sexual
3 Abuse, which was a criminal offense under Arizona Revised Statute 13-1404.

4 246. In violation of Title 18, United States Code, Sections 2423(a) and 2.

5 **COUNT 33**

6 247. The allegations contained in all preceding paragraphs are realleged and
7 incorporated herein as if fully set forth in this paragraph.

8 248. On or between November 15, 2020 and March 2, 2021, in the District of
9 Arizona and elsewhere, the defendants, SAMUEL RAPPYLEE BATEMAN and LEILANI
10 BISTLINE, and others known and unknown to the grand jury, did knowingly persuade,
11 induce, entice, and coerce Jane Doe 11 to travel in interstate commerce, from Colorado to
12 Arizona, to engage in sexual activity for which any person can be charged with a criminal
13 offense, namely; Sexual Conduct with a Minor, which was a criminal offense under
14 Arizona Revised Statute 13-1405; Molestation of a Child, which was a criminal offense
15 under Arizona Revised Statute 13-1410 (through October 1, 2021); and Sexual Abuse,
16 which was a criminal offense under Arizona Revised Statute 13-1404 (through October 1,
17 2021).

18 249. In violation of Title 18, United States Code, Sections 2422(a) and 2.

19 **COUNT 34**

20 250. The allegations contained in all preceding paragraphs are realleged and
21 incorporated herein as if fully set forth in this paragraph.

22 251. On or between November 15, 2020 and September 13, 2022, in the District
23 of Arizona and elsewhere, the defendants, SAMUEL RAPPYLEE BATEMAN and
24 LEILANI BISTLINE, and others known and unknown to the grand jury, did use a facility
25 and means of interstate commerce to knowingly persuade, induce, entice, and coerce Jane
26 Doe 11, who had not attained the age of 18 years, to engage in sexual activity for which
27 any person can be charged with a criminal offense, namely, Sexual Conduct with a Minor,
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1 which was a criminal offense under Arizona Revised Statute 13-1405; Molestation of a
2 Child, which was a criminal offense under Arizona Revised Statute 13-1410 (through
3 October 1, 2021); Sexual Abuse, which was a criminal offense under Arizona Revised
4 Statute 13-1404 (through October 1, 2021); Sexual Abuse of a Minor in the First Degree,
5 which was a criminal offense under Wyoming Statute 6-2-314(a)(iii); Sexual Abuse of a
6 Minor in the Second Degree, which was a criminal offense under Wyoming Statute 6-2-
7 315(a)(i) and (iv); and Sexual Abuse of a Minor in the Third Degree, which was a criminal
8 offense under Wyoming Statute 6-2-316(a)(i) and (iv).

9 252. In violation of Title 18, United States Code, Sections 2422(b) and 2.

10 **COUNT 35**

11 253. The allegations contained in all preceding paragraphs are realleged and
12 incorporated herein as if fully set forth in this paragraph.

13 254. On or between November 15, 2020 and March 2, 2021, in the District of
14 Arizona and elsewhere, the defendants, SAMUEL RAPPYLEE BATEMAN and LEILANI
15 BISTLINE, and others known and unknown to the grand jury, did knowingly transport,
16 and cause to be transported, Jane Doe 11, who had not attained the age of 18 years, in
17 interstate commerce, from Colorado to Arizona, with the intent that Jane Doe 11 engage in
18 sexual activity for which any person can be charged with a criminal offense, namely,
19 Sexual Conduct with a Minor, which was a criminal offense under Arizona Revised Statute
20 13-1405; Molestation of a Child, which was a criminal offense under Arizona Revised
21 Statute 13-1410 (through October 1, 2021); and Sexual Abuse, which was a criminal
22 offense under Arizona Revised Statute 13-1404 (through October 1, 2021).

23 255. In violation of Title 18, United States Code, Sections 2423(a) and 2.

24 **COUNT 36**

25 256. The allegations contained in all preceding paragraphs are realleged and
26 incorporated herein as if fully set forth in this paragraph.

1 intent that Jane Doe 10 engage in sexual activity for which any person can be charged with
2 a criminal offense, namely, Sexual Assault, which was a criminal offense under Colorado
3 Revised Statute 18-3-402(1)(e); and Unlawful Sexual Contact, which was a criminal
4 offense under Colorado Revised Statute 18-3-404(1.5).

5 264. In violation of Title 18, United States Code, Sections 2423(a) and 2.

6 **COUNT 39**

7 265. The allegations contained in all preceding paragraphs are realleged and
8 incorporated herein as if fully set forth in this paragraph.

9 266. On or between September 12 and 13, 2022, in the District of Arizona and
10 elsewhere, the defendants, SAMUEL RAPPYLEE BATEMAN and BRENDA BARLOW,
11 and others known and unknown to the grand jury, did knowingly transport, and cause to be
12 transported, Jane Doe 10, who had not attained the age of 18 years, in interstate commerce,
13 from Arizona to Utah, with the intent that Jane Doe 10 engage in sexual activity for which
14 any person can be charged with a criminal offense, namely, Unlawful Sexual Conduct with
15 a 16 or 17 Year Old, which was a criminal offense under Utah Code 76-5-401.2.

16 267. In violation of Title 18, United States Code, Sections 2423(a) and 2.

17 **COUNT 40**

18 268. The allegations contained in all preceding paragraphs are realleged and
19 incorporated herein as if fully set forth in this paragraph.

20 269. On or about August 28, 2022, in the District of Arizona, the defendants,
21 SAMUEL RAPPYLEE BATEMAN, BRENDA BARLOW, and TORRANCE BISTLINE,
22 and others known and unknown to the grand jury, did corruptly alter, destroy, mutilate, and
23 conceal a record, and attempted to do so, with the intent to impair its integrity and
24 availability for use in a foreseeable prosecution before a Court of the United States, an
25 official proceeding, that is, by deleting and attempting to delete electronic communications
26 associated with Signal accounts.

27 270. In violation of Title 18, United States Code, Sections 1512(c)(1) and 2.
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COUNT 41

271. The allegations contained in all preceding paragraphs are realleged and incorporated herein as if fully set forth in this paragraph.

272. On or about August 28, 2022, in the District of Arizona, the defendants, SAMUEL RAPPYLEE BATEMAN, BRENDA BARLOW, and TORRANCE BISTLINE, and others known and unknown to the grand jury, did knowingly and willfully conspire and agree together and with each other, to corruptly alter, destroy, mutilate, and conceal a record, with the intent to impair its integrity and availability for use in a foreseeable prosecution before a Court of the United States, an official proceeding, that is, by deleting and attempting to delete electronic communications associated with Signal accounts, in violation of Title 18, United States Code, Sections 1512(c)(1) and 2.

273. All in violation of Title 18, United States Code, Section 1512(k).

COUNT 42

274. The allegations contained in all preceding paragraphs are realleged and incorporated herein as if fully set forth in this paragraph.

275. On or about August 28, 2022, in the District of Arizona, the defendants, SAMUEL RAPPYLEE BATEMAN, BRENDA BARLOW, TORRANCE BISTLINE, and others known and unknown to the grand jury, did corruptly obstruct, influence, and impede a foreseeable prosecution before a Court of the United States, an official proceeding, and attempted to do so, by deleting, attempting to delete, and directing others to delete, electronic communications associated with Signal accounts.

276. In violation of Title 18, United States Code, Sections 1512(c)(2) and 2.

COUNT 43

277. The allegations contained in all preceding paragraphs are realleged and incorporated herein as if fully set forth in this paragraph.

278. On or about August 28, 2022, in the District of Arizona, the defendants, SAMUEL RAPPYLEE BATEMAN, BRENDA BARLOW, and TORRANCE BISTLINE,

1 and others known and unknown to the grand jury, did knowingly and willfully conspire
2 and agree together and with each other, to corruptly obstruct, influence, and impede a
3 foreseeable prosecution before a Court of the United States, an official proceeding, by
4 deleting, attempting to delete, and directing others to delete, electronic communications
5 associated with Signal accounts, in violation of Title 18, United States Code, Sections
6 1512(c)(2) and 2.

7 279. All in violation of Title 18, United States Code, Section 1512(k).

8 **COUNT 44**

9 280. The allegations contained in all preceding paragraphs are realleged and
10 incorporated herein as if fully set forth in this paragraph.

11 281. On or about August 28, 2022, in the District of Arizona, the defendant,
12 SAMUEL RAPPYLEE BATEMAN, and others known and unknown to the grand jury,
13 did knowingly alter, destroy, mutilate, and conceal records, that is, electronic
14 communications associated with Signal accounts, with the intent to impede, obstruct, and
15 influence the investigation and proper administration of a matter that the defendant
16 contemplated was within the jurisdiction of the Federal Bureau of Investigation, a
17 department and agency of the United States.

18 282. In violation of Title 18, United States Code, Sections 1519 and 2.

19 **COUNT 45**

20 283. The allegations contained in all preceding paragraphs are realleged and
21 incorporated herein as if fully set forth in this paragraph.

22 284. Beginning on a date unknown, but at least between May 5, 2020 and
23 December 1, 2022, in the District of Arizona and elsewhere, the defendant, SAMUEL
24 RAPPYLEE BATEMAN, and others known and unknown to the grand jury, did knowingly
25 intimidate, threaten, corruptly persuade, and engage in misleading conduct toward Jane
26 Doe 3, Jane Doe 4, Jane Doe 5, Jane Doe 6, Jane Doe 7, Jane Doe 8, Jane Doe 9, Jane Doe
27 10, Jane Doe 11, and others, and attempted to so, by instructing them what to say if and
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1 when they were ever interviewed by a government agency, with the intent to influence,
2 delay, and prevent the testimony of Jane Doe 3, Jane Doe 4, Jane Doe 5, Jane Doe 6, Jane
3 Doe 7, Jane Doe 8, Jane Doe 9, Jane Doe 10, Jane Doe 11, and others, in a foreseeable
4 prosecution before a Court of the United States, an official proceeding.

5 285. In violation of Title 18, United States Code, Sections 1512(b)(1) and 2.

6 **COUNT 46**

7 286. The allegations contained in all preceding paragraphs are realleged and
8 incorporated herein as if fully set forth in this paragraph.

9 287. On or about September 13, 2022, in the District of Arizona and elsewhere,
10 the defendant, BRENDA BARLOW, and others known and unknown to the grand jury,
11 did corruptly alter, destroy, mutilate, and conceal a record, and other object, and attempted
12 to do so, with the intent to impair its integrity and availability for use in a foreseeable
13 criminal proceeding before a Court of the United States, an official proceeding, that is, by
14 hiding potential evidence.

15 288. In violation of Title 18, United States Code, Sections 1512(c)(1) and 2.

16 **COUNT 47**

17 289. The allegations contained in all preceding paragraphs are realleged and
18 incorporated herein as if fully set forth in this paragraph.

19 290. On or between November 27 and December 1, 2022, in the District of
20 Arizona and elsewhere, the defendants, SAMUEL RAPPYLEE BATEMAN, NAOMI
21 BISTLINE, DONNAE BARLOW, MORETTA ROSE JOHNSON, BRENDA BARLOW,
22 and others known and unknown to the grand jury, did corruptly obstruct, influence, and
23 impede a foreseeable prosecution before a Court of the United States, an official
24 proceeding, and attempted to do so, by aiding minors to escape Arizona Department of
25 Child Safety custody and evade law enforcement.

26 291. In violation of Title 18, United States Code, Sections 1512(c)(2) and 2.
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COUNT 48

292. The allegations contained in all preceding paragraphs are realleged and incorporated herein as if fully set forth in this paragraph.

293. Beginning at a time unknown, but at least on or between November 26 and December 1, 2022, in the District of Arizona and elsewhere, the defendants, SAMUEL RAPPYLEE BATEMAN, NAOMI BISTLINE, DONNAE BARLOW, MORETTA ROSE JOHNSON, BRENDA BARLOW, and others known and unknown to the grand jury, did knowingly and willfully conspire and agree together and with each other, to corruptly obstruct, influence, and impede a foreseeable prosecution before a Court of the United States, an official proceeding, by aiding minors to escape Arizona Department of Child Safety custody and evade law enforcement, in violation of Title 18, United States Code, Sections 1512(c)(2) and 2.

294. All in violation of Title 18, United States Code, Section 1512(k).

COUNT 49

295. The allegations contained in all preceding paragraphs are realleged and incorporated herein as if fully set forth in this paragraph.

296. On or between November 27 and December 1, 2022, in the District of Arizona and elsewhere, the defendants, SAMUEL RAPPYLEE BATEMAN, NAOMI BISTLINE, DONNAE BARLOW, MORETTA ROSE JOHNSON, BRENDA BARLOW, and others known and unknown to the grand jury, did unlawfully seize, confine, inveigle, decoy, kidnap, abduct, and carry away Jane Doe 4, Jane Doe 8, and Jane Doe 9, and held them for a purpose (to wit: to take them out of Arizona Department of Child Safety custody and evade law enforcement), and in committing and in furtherance of their commission of the offense, the defendants did travel in and willfully transported the victims in interstate commerce from Arizona to Washington, and used a means, facility, and instrumentality of interstate commerce.

297. In violation of Title 18, United States Code, Sections 1201(a)(1), (b), and 2.

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COUNT 50

298. The allegations contained in all preceding paragraphs are realleged and incorporated herein as if fully set forth in this paragraph.

299. Beginning at a time unknown, but at least on or between November 26 and December 1, 2022, in the District of Arizona and elsewhere, the defendants, SAMUEL RAPPYLEE BATEMAN, NAOMI BISTLINE, DONNAE BARLOW, MORETTA ROSE JOHNSON, BRENDA BARLOW, and others known and unknown to the grand jury, did knowingly and willfully conspire and agree together and with each other, to unlawfully seize, confine, inveigle, decoy, kidnap, abduct, and carry away Jane Doe 4, Jane Doe 8, and Jane Doe 9, and held them for a purpose (to wit: to take them out of Arizona Department of Child Safety custody and evade law enforcement), and in committing and in furtherance of their commission of the offense, the defendants did travel in and willfully transported the victims in interstate commerce from Arizona to Washington, and used a means, facility, and instrumentality of interstate commerce, in violation of Title 18, United States Code, Sections 1201(a)(1), (b), and 2.

Overt Acts

300. In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the District of Arizona and elsewhere:

301. On or about November 26, 2022, defendant BRENDA BARLOW messaged Jane Doe 7 on behalf of defendant SAMUEL RAPPYLEE BATEMAN to ask Jane Doe 7 to pass a message to the other minor female victims reminding them that defendant BATEMAN was still in custody and not to give up on him.

302. On or about November 27, 2022, defendant BRENDA BARLOW communicated with defendant SAMUEL RAPPYLEE BATEMAN and many of his followers about the plan to assist the minor female victims in leaving AZ DCS custody. At

1 the time, defendant BRENDA BARLOW was attempting to ascertain Jane Doe 6's
2 location.

3 303. Later, on or about November 27, 2022, defendants NAOMI BISTLINE,
4 DONNAE BARLOW, and MORETTA ROSE JOHNSON, assisted eight of the nine minor
5 female victims (three of them under the age of 14) to leave the custody of the AZ DCS
6 group homes in which they were staying pending delinquency proceedings following the
7 September 13, 2022 arrest of defendant SAMUEL RAPPYLEE BATEMAN, and their
8 Court Authorized Removals.

9 304. Specifically, defendants NAOMI BISTLINE and DONNAE BARLOW
10 picked up minor victims, Jane Doe 8, Jane Doe 9, and Jane Doe 7, after they left AZ DCS
11 custody on or about November 27, 2022.

12 305. Defendant MORETTA ROSE JOHNSON picked up minor victims, Jane
13 Doe 3, Jane Doe 4, Jane Doe 5, Jane Doe 10, and Jane Doe 11, after they left AZ DCS
14 custody on or about November 27, 2022.

15 306. On the evening of November 27, 2022, defendant SAMUEL RAPPYLEE
16 BATEMAN made a recorded video call from the Core Civic/Central Arizona Florence
17 Correctional Complex ("CAFCC"), where he was in federal custody, to defendant
18 DONNAE BARLOW. During the video call, defendant DONNAE BARLOW was driving
19 a vehicle and defendant NAOMI BISTLINE was the front-seat passenger. Defendant
20 NAOMI BISTLINE informed defendant BATEMAN that they had Jane Doe 8 and Jane
21 Doe 9, referenced by code names.

22 307. On or between November 27, 2022 and December 1, 2022, defendant
23 BRENDA BARLOW communicated with and between defendant SAMUEL RAPPYLEE
24 BATEMAN and others to ascertain the status of the minor female victims and provide
25 updates to defendant BATEMAN.

26 308. On the morning of November 28, 2022, defendant SAMUEL RAPPYLEE
27 BATEMAN made a video call from CAFCC to defendant NAOMI BISTLINE, who
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1 appeared to be in a hotel room. In response to defendant BATEMAN's questioning about
2 who was with them, defendant NAOMI BISTLINE told defendant BATEMAN that "W2"
3 (a reference to Jane Doe 6, the one of nine girls to have not escaped from AZ DCS custody)
4 was the only one not with them, but that they had tried and ran for their lives after police
5 were called. Defendant BATEMAN told them they needed to get W2. The video panned
6 to all eight minors taken from AZ DCS custody.

7 309. In the following days, defendant SAMUEL RAPPYLEE BATEMAN made
8 numerous video calls to defendant NAOMI BISTLINE and the missing girls. At one point,
9 defendant BATEMAN asked if they were in "our state" and they stated that they were not.

10 310. On or about November 28, 2022, defendant SAMUEL RAPPYLEE
11 BATEMAN made video calls to defendant MORETTA ROSE JOHNSON's phone, where
12 he spoke with defendant MARONA JOHNSON, who appeared to be in a hotel room with
13 a baby and at least one other adult wife of defendant BATEMAN. They talked about being
14 a long way away. Defendant MARONA JOHNSON told defendant BATEMAN that "we
15 are helping you." Defendant BATEMAN encouraged defendant MARONA JOHNSON to
16 stay strong.

17 311. After discussions about needing more vehicles, on another call on or about
18 the evening of November 28, 2022, defendant LEILANI BISTLINE reported to defendant
19 SAMUEL RAPPYLEE BATEMAN that she had cleaned out one of the vehicles and she
20 and defendant JOSEPHINE BARLOW BISTLINE were able to swap out vehicles with the
21 other wives of defendant BATEMAN.

22 312. In the days following the girls' disappearance, defendant BRENDA
23 BARLOW was communicating with defendant SAMUEL RAPPYLEE BATEMAN and
24 all of his followers, coordinating and reporting everybody's whereabouts.

25 313. On or about November 29, 2022, defendant TORRANCE BISTLINE offered
26 to help the defendants and others to evade law enforcement.

1 and unknown to the grand jury to harass and threaten known cooperating government
2 witnesses, in violation of Title 18, United States Code, Sections 1512(c)(2) and 2.

3 321. All in violation of Title 18, United States Code, Section 1512(k).

4 **COUNT 53**

5 322. The allegations contained in all preceding paragraphs are realleged and
6 incorporated herein as if fully set forth in this paragraph.

7 323. On or between March 15 and March 24, 2023, in the District of Arizona and
8 elsewhere, the defendant, SAMUEL RAPPYLEE BATEMAN, and others known and
9 unknown to the grand jury, did knowingly attempt to intimidate, and corruptly persuade
10 Jane Doe 3, Jane Doe 4, Jane Doe 5, Jane Doe 6, Jane Doe 7, Jane Doe 8, Jane Doe 9, Jane
11 Doe 10, Jane Doe 11, and others, by instructing them, and having them instructed, not to
12 speak with anyone about a pending federal investigation and prosecution, with the intent
13 to influence, delay, and prevent the testimony of Jane Doe 3, Jane Doe 4, Jane Doe 5, Jane
14 Doe 6, Jane Doe 7, Jane Doe 8, Jane Doe 9, Jane Doe 10, Jane Doe 11, and others, in a
15 criminal proceeding before a Court of the United States, an official proceeding.

16 324. In violation of Title 18, United States Code, Sections 1512(b)(1) and 2.

17 **COUNT 54**

18 325. The allegations contained in all preceding paragraphs are realleged and
19 incorporated herein as if fully set forth in this paragraph.

20 326. On or about March 24, 2023, in the District of Arizona and elsewhere, the
21 defendant, JOSEPHINE BARLOW BISTLINE, did knowingly and willfully transmit in
22 interstate and foreign commerce a threat to injure the person of another: to wit, the
23 defendant sent an electronic mail communication threatening to injure and harm C.B.

24 327. In violation of Title 18, United States Code, Section 875(c).

25 **COUNT 55**

26 328. The allegations contained in all preceding paragraphs are realleged and
27 incorporated herein as if fully set forth in this paragraph.

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1 right, title, and interest in (a) any property constituting, or derived from, any proceeds the
2 persons obtained, directly or indirectly, as the result of the offense, and (b) any of the
3 defendant's property used, or intended to be used, in any manner or part, to commit, or to
4 facilitate the commission of, such offense as to which property the defendants is liable. If
5 any forfeitable property, as a result of any act or omission of the defendant:

- 6 (1) cannot be located upon the exercise of due diligence,
- 7 (2) has been transferred or sold to, or deposited with, a third party,
- 8 (3) has been placed beyond the jurisdiction of the court,
- 9 (4) has been substantially diminished in value, or
- 10 (5) has been commingled with other property which cannot be divided without
11 difficulty,

12 it is the intent of the United States to seek forfeiture of any other property of said defendant
13 up to the value of the above-described forfeitable property, pursuant to 21 U.S.C. § 853(p).

14 337. All in accordance with 18 U.S.C. §§ 981, 2253, and 2428, 21 U.S.C. § 853,
15 28 U.S.C. § 2461(c), and Rule 32.2, Federal Rules of Criminal Procedure.

16
17 A TRUE BILL

18 /S

19 FOREPERSON OF THE GRAND JURY
Date: May 18, 2023

20
21 GARY M. RESTAINO
United States Attorney
District of Arizona

22 /S

23 _____
24 DIMITRA H. SAMPSON
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