

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

GARY M. RESTAINO
United States Attorney
District of Arizona

DIMITRA H. SAMPSON
Assistant United States Attorney
Arizona State Bar No. 019133
Two Renaissance Square
40 N. Central Ave., Suite 1800
Phoenix, Arizona 85004
Telephone: 602-514-7500
Email: dimitra.sampson@usdoj.gov
Attorneys for Plaintiff

<input checked="" type="checkbox"/> FILED	<input type="checkbox"/> LODGED
<input type="checkbox"/> RECEIVED	<input type="checkbox"/> COPY
SEP 06 2022	
CLERK U S DISTRICT COURT DISTRICT OF ARIZONA	
BY <u>NIS</u>	DEPUTY

SEALED

REDACTED FOR
PUBLIC DISCLOSURE

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,
Plaintiff,

vs.

Samuel Rappylee Bateman,
Defendant.

No. CR-22-08092-PCT-DGC (ESW)

INDICTMENT

VIO: 18 U.S.C. § 1512(c)(1) and 2
(Destruction of Records in an
Official Proceeding and Aid and
Abet)
Count 1

18 U.S.C. § 1512(c)(2)
(Tampering with an Official
Proceeding)
Count 2

18 U.S.C. § 1519 and 2
(Destruction of Records in a Federal
Investigation and Aid and Abet)
Count 3

THE GRAND JURY CHARGES:

COUNT 1

On or about August 28, 2022, in the District of Arizona, the defendant, SAMUEL RAPPYLEE BATEMAN, and others known and unknown to the grand jury, did corruptly alter, destroy, mutilate, and conceal a record, and attempted to do so, with the intent to impair its integrity and availability for use in a foreseeable criminal proceeding before a Court of the United States, an official proceeding, that is, by deleting and attempting to delete electronic communications associated with Signal accounts.

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

2 **COUNT 2**

3 On or about August 28, 2022, in the District of Arizona, the defendant, SAMUEL
4 RAPPYLEE BATEMAN, did corruptly obstruct, influence, and impede a foreseeable
5 prosecution before a Court of the United States, an official proceeding, and attempted to
6 do so, by directing others known and unknown to the grand jury to destroy records, that is,
7 by deleting and attempting to delete electronic communications associated with Signal
8 accounts.

9 In violation of Title 18, United States Code, Section 1512(c)(2).

10 **COUNT 3**

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

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

19 A TRUE BILL

20 *S/*

21 FOREPERSON OF THE GRAND JURY
Date: September 6, 2022

22 GARY M. RESTAINO
23 United States Attorney
District of Arizona

24 *S/*

25 DIMITRA H. SAMPSON
26 Assistant U.S. Attorney

27

28