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**UNITED STATES DISTRICT COURT**  
**District of Kansas**  
(Wichita Docket)

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**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**Case No. 6:20-cr-10077-JWB**

**ALLEN E. STANDISH,**

**Defendant.**

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**SUPERSEDING INDICTMENT**

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**THE GRAND JURY CHARGES:**

**COUNT 1**

**UNLAWFUL USER IN POSSESSION OF A FIREARM**  
[18 U.S.C. § 922(g)(3) and § 924(a)(2)]

On or about the 27th day of October, 2020, in the District of Kansas, the defendant,

**ALLEN E. STANDISH,**

knowing that he was an unlawful user of a controlled substance, as defined in 21 U.S.C. § 802, did knowingly possess a firearm, that is a, Spikes Tactical, model ST15, .223 caliber, rifle bearing serial number NSL-120501, which had been modified to function as a machinegun, said firearm having been shipped and transported in interstate commerce.

The above act was in violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(2).

**COUNTS 2 THROUGH 7**

**UNLAWFUL POSSESSION OF A MACHINE GUN  
[18 U.S.C. § 922(o) and § 924(a)(2)]**

On or about the 27th day of October, 2020, in the District of Kansas, the defendant,

**ALLEN E. STANDISH,**

did knowingly possess a machinegun, as described below:

<b>Count</b>	<b>Description</b>	<b>Serial Number</b>
2	Spikes Tactical, model ST 15, M16 type operable machine gun	NSL-120501
3	G3 type, 7.62x51mm caliber, privately made operable machine gun	none
4	Fabrique Nationale Herstal, model Scar 17S, 7.62x51mm, a firearm incorporating a combination of parts designed to convert it into a machine gun	HC43698
5	RPB Industries, model SM11-A1, .380 ACP, an operable machine gun	SAP380198
6	M16 type lower assembly incorporating Joe Bob Outfitters, model ML-9 receiver	KS904412
7	Romarm SA/Cugir, model GP/Wasr10/63 with Slide Fire Solutions, Inc. bump stock-type device, incorporating a combination of parts designed to convert it into a machine gun	1984PF5231

The above acts were in violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

## COUNTS 8 THROUGH 14

### UNLAWFUL POSSESSION OF AN UNREGISTERED FIREARM [26 U.S.C. §§ 5841, 5861(d), and 5871]

On or about the 27th day of October, 2020, in the District of Kansas, the defendant,

**ALLEN E. STANDISH,**

knowingly received and possessed a firearm silencer, as set forth below, which was not registered to him in the National Firearms Registration and Transfer Record:

<b>Count</b>	<b>Description</b>	<b>Serial Number</b>
8	Black metal cylindrical device approximately 6- 7/8” in length & 1-1/2” attached to machinegun described in Count 2	None
9	Black metal cylindrical device approximately 8-3/4” in length & 1-3/4 inches in diameter attached to machinegun described in Count 5	None
10	Black metal cylindrical device approximately 5-1/2” in length and 1” in diameter	None
11	Silver metal cylindrical device approximately 6” in length and 1” in diameter	None
12	Black metal cylindrical device approximately 6-1/4” in length and 1-1/2” in diameter	None
13	Black metal cylindrical device approximately 7-1/4” in length and 1-1/2” in diameter	None
14	Silver metal cylindrical device approximately 6” in length and 1” in diameter	None

The above acts were in violation of Title 26, United States Code, Sections 5841, 5861(d), and 5871.

**COUNTS 15 THROUGH 16**

**UNLAWFUL POSSESSION OF AN UNREGISTERED FIREARM  
[26 U.S.C. §§ 5841, 5861(d), and 5871]**

On or about the 27th day of October, 2020, in the District of Kansas, the defendant,

**ALLEN E. STANDISH,**

knowingly received and possessed a firearm, a short barreled shotgun having a barrel of less than 18 inches in length and/or a short barreled rifle having a barrel less than 16 inches in length, as described below, which was not registered to him in the National Firearms Registration and Transfer Record:

<b>Count</b>	<b>Description</b>	<b>Serial Number</b>
15	Spikes Tactical, model ST15, short barreled rifle (machine gun)	NSL-120501
16	Carl Walther, model HK416, short barreled rifle	WH011442

The above acts being in violation of Title 26, United States Code, §§ 5841, 5861(d), and 5871.

**FORFEITURE NOTICE**

1. The allegations contained in Counts 1-16 of this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d), Title 26, United States Code, Section 5872(a) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of one or more of the offenses set forth in Counts 1-16 of this Superseding Indictment, the defendant, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section

2461(c), any firearms or ammunition involved in the commission of the offenses, including, but not limited to:

A. Spikes Tactical, model ST15, .233 caliber firearm bearing serial number NSL-120501;

B. G3 type, 7.62x51mm caliber, privately made operable machine gun, serial number: none;

C. Fabrique Nationale Herstal, model Scar 17S, 7.62x51mm, a firearm incorporating a combination of parts designed to convert it into a machine gun serial number HC43698;

D. RPB Industries, model SM11-A1, .380 ACP, an operable machine gun, serial number SAP380198;

E. M16 type lower assembly incorporating Joe Bob Outfitters, model ML-9 receiver, serial number KS904412;

F. AR type, .410 caliber with Anderson Manufacturing, model AM-15 M16 type receiver, an operable machine gun serial number 18267208;

G. Romarm SA/Cugir, model GP/Wasr10/63 with Slide Fire Solutions, Inc. bump stock-type device, incorporating a combination of parts designed to convert it into a machine gun, serial number 1984PF5231;

H. Black metal cylindrical device approximately 6- 7/8" in length & 1-1/2" attached to machinegun described in Count 2;

I. Black metal cylindrical device approximately 8-3/4" in length & 1-3/4 inches in diameter attached to machinegun described in Count 5;

J. Black metal cylindrical device approximately 5-1/2" in length and 1" in diameter;

K. Silver metal cylindrical device approximately 6" in length and 1" in diameter;

L. Black metal cylindrical device approximately 6-1/4" in length and 1-1/2" in diameter;

M. Black metal cylindrical device approximately 7-1/4" in length and 1-1/2" in diameter;

N. Silver metal cylindrical device approximately 6" in length and 1" in diameter;

O. .410 caliber firearm, Anderson Manufacturing, model AM-15, M16 type short barreled shotgun;

P. Carl Walther, model HK416, short barreled rifle; and

Q. Ammunition recovered during investigation.

3. Upon conviction of one or more of the offenses set forth in Counts 8-16 of this Superseding Indictment, the defendant, shall forfeit to the United States pursuant to Title 26, United States Code, Section 5872(a) and Title 28, United States Code, Section 2461(c), all firearms involved in the offenses, including, but not limited to:

A. Black metal cylindrical device approximately 6- 7/8" in length & 1-1/2" attached to machinegun described in Count 2;

B. Black metal cylindrical device approximately 8-3/4" in length & 1-3/4 inches in diameter attached to machinegun described in Count 5;

C. Black metal cylindrical device approximately 5-1/2" in length and 1" in diameter;

D. Silver metal cylindrical device approximately 6" in length and 1" in diameter;

E. Black metal cylindrical device approximately 6-1/4” in length and 1-1/2” in diameter;

F. Black metal cylindrical device approximately 7-1/4” in length and 1-1/2” in diameter;

G. Silver metal cylindrical device approximately 6” in length and 1” in diameter;

H. Spikes Tactical, model ST15, multicaliber firearm bearing serial number NSL-120501;

I. .410 caliber firearm, Anderson Manufacturing, model AM-15, M16 type short barreled shotgun; and

J. Carl Walther, model HK416, short barreled rifle.

**A TRUE BILL**

March 23, 2021  
DATE

s/Foreperson  
FOREPERSON OF THE GRAND JURY

DUSTON J. SLINKARD  
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IT IS REQUESTED THAT THE TRIAL BE HELD IN WICHITA, KANSAS

## **PENALTIES**

### **Count 1**

- Punishable by a term of imprisonment of not more than ten (10) years. 18 U.S.C. 924(a)(2).
- A term of supervised release of not more than three (3) years. 18 U.S.C. 3583(b)(2).
- A fine not to exceed \$250,000.00. 18 U.S.C. 3571(b)(3).
- A mandatory special assessment of \$100.00. 18 U.S.C. § 3013(a)(2)(A).

### **Counts 2 – 7**

- Punishable by a term of imprisonment of not more than ten (10) years. 18 U.S.C. § 924(a)(2)
- A term of supervised release of not more than three (3) years. 18 U.S.C. 3583(b)(2).
- A fine not to exceed \$250,000.00. 18 U.S.C. 3571(b)(3).
- A mandatory special assessment of \$100.00. 18 U.S.C. § 3013(a)(2)(A).

### **Counts 8 - 14**

- Punishable by a term of imprisonment of not more than ten (10) years. 26 U.S.C. § 5871.
- A term of supervised release of not more than three (3) years. 18 U.S.C. 3583(b)(2).
- A fine not to exceed \$10,000.00. 18 U.S.C. 3571(b)(3).
- A mandatory special assessment of \$100.00. 18 U.S.C. § 3013(a)(2)(A).

### **Counts 15 - 16**

- Punishable by a term of imprisonment of not more than ten (10) years. 26 U.S.C. § 5871.



- A term of supervised release of not more than three (3) years. 18 U.S.C. 3583(b)(2).
- A fine not to exceed \$10,000.00. 18 U.S.C. 3571(b)(3).
- A mandatory special assessment of \$100.00. 18 U.S.C. § 3013(a)(2)(A).