

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
SOUTHERN DIVISION

NO.7:20-CR-167-1M2  
NO.7:20-CR-167-2M2  
NO.7:20-CR-167-3M2  
NO.7:20-CR-167-4M2  
NO. 7:20-CR-167-5M2

UNITED STATES OF AMERICA )  
 )  
 v. )  
 )  
 LIAM MONTGOMERY COLLINS )  
 a/k/a "Disciple" )  
 PAUL JAMES KRYSOUK )  
 a/k/a "Deacon" )  
 JORDAN DUNCAN )  
 a/k/a "Soldier" )  
 JUSTIN WADE HERMANSON )  
 a/k/a "Sandman" )  
 JOSEPH MAURINO )  
 a/k/a "Bishop" )

INDICTMENT  
Third Superseding

The Grand Jury charges:

INTRODUCTION

1. From approximately March of 2011 – November of 2017, Iron March was an online message board platform used for communications and posts by neo-Nazi and White Supremacy Extremist (WSE) groups and those advocating WSE ideologies.
2. Beginning as early as 2016 and continuing into 2017, Defendant LIAM MONTGOMERY COLLINS, also known as "Disciple," used the name "Niezgoda," and posted frequently on Iron March. COLLINS was born in Sweden but attended high school in New Jersey, which is where he was living at the time of these posts. In 2017, COLLINS entered the Marines and was stationed at Camp LeJeune, NC, until

his separation from the military in September 2020.

3. Defendant PAUL JAMES KRYSCUK, also known as “DEACON,” lived in New York until early 2020, when he moved to Boise, Idaho. He has utilized the alias “Pauly Harker” in the past, and currently uses the alias of “Shaun Corcoran” by way of a false Idaho driver’s license and altered bank records. Under the user name “Visions\_from\_Patmos,” KRYSCUK also frequently posted on Iron March.

4. Defendant JORDAN DUNCAN, also known as “Soldier,” from North Carolina, previously served in the Marine Corps from 2013 – 2018, and was assigned to Camp LeJeune, North Carolina while on active duty. After separating from the military, he worked as a contractor for the U.S. Air Force at Lackland Air Force Base (AFB) in San Antonio, Texas and in September 2020, began working as a contractor for the U.S. Navy in or near Boise, Idaho.

5. Defendant JUSTIN WADE HERMANSON, also known as “Sandman,” from North Carolina, joined the U.S. Marines in March of 2017, and was a member of the same unit to which COLLINS was last assigned.

6. Using the Iron March platform, COLLINS discussed recruitment for a group he described as “a modern day SS” located in the northeastern region of the United States. In 2016, COLLINS posted that he was organizing a legitimate Paramilitary/ Defense force. He described it in this way:

...everyone [in the group] is going to be required to have served in a nation’s military, whether US, UK, or Poland . . . Its (sic) a goal for the long-term. I’ll be in the USMC for 4 years while my comrades work on the groups physical formation. . . .It will take years to gather all the experience and intelligence that we need to utilize – but that’s what makes it fun. It takes a man’s willpower and heart to make a

commitment like this . . . .

COLLINS went on to explain that he was giving four years to the Marines “for the cause” and that most of his revenue goes into equipment for himself and his group.

7. In early 2017, COLLINS (user name “Niezgoda”) communicated via Iron March with KRYSCUK (user name “Visions\_from\_Patmos”) about COLLINS’ paramilitary group. In February 2017, KRYSCUK set forth the steps necessary to achieving change in the U.S. in accord with his ideology:

First order of business is knocking down The System, mounting it and smashing it’s face until it has been beaten past the point of death . . . eventually we will have to bring the rifles out and go to work. . . .We will have to hit the streets and strike as many blows to the remaining power structure as we can to keep it on the ropes . . .forget the pawns and go for the knights, kings, and queens. . .

Second order of business . . . is the seizing of territory and the Balkanization of North America. Buying property in remote areas that are already predominantly white and right leaning, networking with locals, training, farming, and stockpiling. Essentially we are laying the framework for a guerilla organization and a takeover of local government and industry.

Start buying property now in the types of regions mentioned above and get to work on building your own group. . . .As time goes on in this conflict, we will expand our territories and slowly take back the land that is rightfully ours. . . .As we build our forces and our numbers, we will move into the urban areas and clear them out. This will be a ground war very reminiscent of Iraq as we will essentially be facing an insurgent force made up of criminals and gang members.

8. In August 2017, COLLINS reported he had a “tightknit crew” of ex-military and security. COLLINS noted they do hikes, gym sessions, live firing exercises, and “eventually plan to buy a lot of land.” This crew went camping together in the summer of 2017.

9. COLLINS and KRYSCUK, in their posts on IronMarch and elsewhere, encouraged the use of an encrypted messaging application as an alternate means of communication outside of the forum, particularly for “serious” discussions.

10. Defendant JORDAN DUNCAN, also known as “Soldier,” while stationed at Camp LeJeune, became a member of COLLINS’ crew, and is later photographed with COLLINS and KRSYCUK in December 2018.

11. In January of 2019, an individual known to the Grand Jury paid KRYSCUK for a “tool.” That payment was for a 9mm pistol manufactured by KRYSCUK for this individual.

12. In May of 2019, another individual known to the Grand Jury paid KRYSCUK for a “build” and a “lower.” This money was for KRYSCUK to construct an assault rifle for the individual.

13. In June of 2019, KRYSCUK received payments from the two persons known to the Grand Jury in paragraphs 10 and 11, as well as from Defendant DUNCAN, for “legos,” a “tool,” and a “jig.” After receiving these funds, KRYSCUK then made purchases in approximately the same amount from a company that sells one of the tools, an AR15 jig, which would assist to manufacture lower receivers into assault-type rifles. By November 2019, KRYSCUK reported he had “milled an 80,” and that he had obtained a jig to do AR-10s.

14. Defendant PAUL JAMES KRYSCUK, also known as “DEACON,” moved from New York to Boise, Idaho in or about February 2020. He conversed with the members of the group about the possibility of converting solvent traps into silencers

in March 2020<sup>1</sup>. He also noted that he felt the “final frontier is real life violence;” that he had been “acquiring some serious skills,” and that he had become “pretty lethal.”

15. In July 2020, DUNCAN, KRYSCUK, JOSEPH MAURINO, also known as “Bishop,” and one other individual known to the Grand Jury met in Boise, Idaho for what appeared to be live-fire weapons training. MAURINO, a resident of New Jersey and a member of the Army National Guard, New Jersey, was known to investigating agents because he had transferred money over an online payment account to KRYSCUK’s account in September 2018. In the two weeks prior to the training, payments were sent by COLLINS, MAURINO, and the other individual known to the Grand Jury to defendant JORDAN DUNCAN, also known as “Soldier,” while DUNCAN was in San Antonio, Texas. DUNCAN then drove his vehicle from Texas to Idaho, and was seen offloading boxes, some heavy, at KRYSCUK’s residence the weekend of the live-fire training. The participants in the training made a compilation video of the live footage from that training and distributed it amongst themselves and showed it to others. This video depicts KRYSCUK, MAURINO, and another individual firing short barrel rifles and each of the participants firing assault-style rifles. The end of the video shows the four participants outfitted in AtomWaffen<sup>2</sup> masks giving the “Heil Hitler” sign, beneath the image of a black sun.

---

<sup>1</sup> A solvent trap is a device designed to be affixed to the end of the barrel of a firearm, to capture any solvent that passes through the barrel during cleaning. Solvent traps can be easily modified using a drill press to make working silencers, requiring compliance with the NFA. 26 U.S.C. §§ 5801-5872.

<sup>2</sup> Atomwaffen, or Atomwaffen Division, is a neo-Nazi group that emerged in 2015-

The last frame of the video displays the statement, "Come home white man."

16. By August 2020, DUNCAN and KRYSCUK were praising the efforts of COLLINS, who they claimed had "sacrificed the most for the cause," had gotten them "tons of gear and training," and had added three Marines to the group.

17. A screenshot of a message from KRYSCUK ("Deacon") in the Wire application dated August 4, 2020, was recovered from MAURINO's phone. The screenshot is of a photo of a United States Postal Service receipt for two packages shipped from Boise, Idaho to New Jersey. One package was intercepted and searched pursuant to a federal warrant issued by the District of New Jersey; on this package, KRYSCUK used his true name and address, and the package contained various gear such as boots and a sleeping bag. It also contained an upper receiver to a short-barreled rifle. The fore-grip, handguards, and optic on that receiver appear to be identical to the short-barrel rifle used by MAURINO in the training video from July 2020.

18. Also recovered from MAURINO's phone was a May 2020 text message inquiry from an individual using the moniker "Gentile" about purchasing guns. Maurino responds in part that for \$600, he could provide an 80% and provide it in a week, and it would be an untraceable Glock. "Gentile" responds by arranging to meet MAURINO in person. There was also a screenshot of communications between

---

2016, created by members of Iron March. Atomwaffen distinguishes itself by its extreme rhetoric, influenced by the writings of a neo-Nazi of an earlier generation, James Mason, who admired Charles Manson and supported the idea of lone wolf violence. Atomwaffen members are associated with the wearing of a skull mask.

KRYSCUK and MAURINO from September 2020 containing an image of a \$449.98 receipt for the purchase of three 80% lowers for assault-type rifles and a jig with which to complete them. \$585 was transferred from MAURINO to KRYSCUK the day previous; MAURINO in turn had received payments of \$185 and \$225 from two other individuals known to the Grand Jury, which he put with an additional \$180 to comprise the funds he sent to KRYSCUK.

19. DUNCAN moved from San Antonio to Boise on or about September 8, 2020; COLLINS was released from the Marines on September 20, 2020 and moved to Boise on or about October 4, 2020. In October 2020, the group had in their possessions at least three 9mm pistols with suppressors, at least 4 lightweight, semi-automatic rifles with a detachable magazine based on the ArmaLite AR-15 design, some with suppressors, and at least two short barrel rifles, all manufactured by KRYSCUK. One of the short-barrel rifles recovered was in the possession of MAURINO in New Jersey.

20. By early 2020, defendant JUSTIN WADE HERMANSON, also known as "Sandman," possessed videos, images, and communications consistent with the ideology expressed by KRYSCUK and Atomwaffen and was communicating directly with KRYSCUK to coordinate some of the above-mentioned firearm and silencer purchases. He paid KRYSCUK for a pistol with a suppressor in April 2020, which KRYSCUK manufactured and shipped from Boise, Idaho to North Carolina. He also began coordinating others' payments to KRYSCUK, by receiving the funds and passing them on to KRYSCUK. HERMANSON also communicated with other

Marines from the Camp Lejeune, North Carolina area, regarding coordinating additional illegal firearms sales through KRYSCUK and building fully automatic rifles. Additionally, KRYSCUK has viewed manuals regarding car bombs, remote detonators, and other explosives. In October 2020, HERMANSON recruited and assisted in vetting at least one other person into the group.

### COUNT ONE

21. Paragraphs 1 through 20 are realleged and incorporated as if stated herein.

22. Beginning in or about June 2019, and continuing to the present, in the Eastern District of North Carolina and elsewhere, the defendants, LIAM MONTGOMERY COLLINS, also known as “Disciple,” PAUL JAMES KRYSCUK, also known as “Deacon,” JORDAN DUNCAN, also known as “Soldier,” JUSTIN WADE HERMANSON, also known as “Sandman,” and JOSEPH MAURINO, also known as “Bishop” did conspire, confederate, and agree with others, both known and unknown to the Grand Jury, to commit offenses against the United States in violation of Title 18, United States Code, Section 922(a)(1)(A), by willfully and knowingly without licensure, engage in the business of manufacturing firearms and in the course of such business to ship, transport, and receive any firearm in interstate commerce.

### **PURPOSE OF THE CONSPIRACY**

23. It was the purpose of the conspiracy for the defendants, LIAM MONTGOMERY COLLINS, also known as “Disciple,” PAUL JAMES KRYSCUK,



also known as “Deacon,” JORDAN DUNCAN, also known as “Soldier,” JUSTIN WADE HERMANSON, also known as “Sandman” and JOSEPH MAURINO, also known as “Bishop,” to regularly and repetitively manufacture and transport firearms and firearm parts, to include suppressors, in a manner that the government would not know the recipients had them, for criminal purposes, to wit, with the intention they be used unlawfully in furtherance of a civil disorder, in violation of 18 U.S.C. § 231(a)(2).

### OVERT ACTS

24. In furtherance of the conspiracy and to achieve the object thereof, at least one of the following overt acts, among others, were committed by the defendants LIAM MONTGOMERY COLLINS, also known as “Disciple,” PAUL JAMES KRYSCUK, also known as “Deacon,” JORDAN DUNCAN, also known as “Soldier,” JUSTIN WADE HERMANSON, also known as “Sandman,” and JOSEPH MAURINO, also known as “Bishop” in the Eastern District of North Carolina and elsewhere, between May 2019 and the present:

- A. On April 24, 2020, defendant LIAM MONTGOMERY COLLINS, also known as “Disciple,” accepted \$1,500 transferred to his personal bank account in payment for a 9mm pistol and suppressor which were to be manufactured by defendant KRYSCUK.
- B. COLLINS then transferred the majority of the \$1,500 to the bank account of JUSTIN WADE HERMANSON, also known as “Sandman,” who then sent the money by Venmo to KRYSCUK.

- C. Defendant PAUL JAMES KRYSCUK, also known as “Deacon,” having received the monies in his VENMO account, transferred them to his personal bank account, and made purchases from vendors known to sell solvent traps.
- D. In May 2020, MAURINO offered to sell an “untraceable” Glock to an individual known to the Grand Jury for \$600.
- E. Using the alias “Shaun Corcoran,” defendant PAUL JAMES KRYSCUK, also known as “Deacon,” then mailed the resulting pistol and suppressor from Idaho to Jacksonville, North Carolina on or about June 17, 2020.
- F. On July 19, 2020, KRYSCUK told DUNCAN in an Instagram chat to “follow BLM Boise,” [referencing Black Lives Matter, an organization that describes itself as having been formed to eradicate white supremacy] as KRYSCUK was getting a lot of intel from their social media.
- G. On July 21, 2020, BLM held a rally on the campus of Boise State University. Surveillance confirmed KRYSCUK was present within eyesight of the rally, first sitting in his parked vehicle then driving around the rally area slowly, for a total of approximately 20 minutes.
- H. On August 18, 2020, BLM held a rally/protest at a park in downtown Boise. The rally had a last-minute location change to the park, to avoid anti-protestors. KRYSCUK’s vehicle was in the area of the rally for 5 to 6 minutes.
- I. In September 2020, MAURINO gathered funds from two other individuals

known to the Grand Jury and sent a total of \$585 to KRYSCUK, who then purchased three 80% lower receivers for AR-style rifles, with a jig needed to complete them.

J. On October 1, 2020, KRYSCUK and DUNCAN discussed their group, which they call the "BSN," shooting protestors in Boise:

- 1) DUNCAN- "How the BSNs finna be pulling up to chipotle after hitting legs"
- 2) KRYSCUK- "Death squad"
- 3) KRYSCUK - "Assassins creed hoodies and suppressed 22 pistols"
- 4) DUNCAN - "People freaking tf out"
- 5) KRYSCUK - "About what"
- 6) DUNCAN - "'The end of democracy'"
- 7) KRYSCUK - "One can hope"

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

## COUNT TWO

25. On or about June 9, 2020, in the Eastern District of North Carolina and elsewhere, the defendants, JUSTIN WADE HERMANSON, also known as "Sandman" and PAUL JAMES KRYSCUK, also known as "Deacon," aiding and abetting one another, not being a licensed importer, manufacturer, dealer, and collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, willfully did transport into the State of North Carolina, where JUSTIN WADE HERMANSON, also known as "Sandman," then resided, a 9mm pistol with suppressor, said firearm having been manufactured and obtained by the defendants outside the State of North Carolina, in violation of Title 18, United States Code, Sections 922(a)(3) and 924(a)(1)(D) and 2.

### **COUNT THREE**

26. On or about June 17, 2020, in the Eastern District of North Carolina and elsewhere, the defendants, LIAM MONTGOMERY COLLINS, also known as “Disciple” and PAUL JAMES KRYSCUK, also known as “Deacon,” aiding and abetting one another, not being a licensed importer, manufacturer, dealer, and collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, willfully did transport into the State of North Carolina, where LIAM MONTGOMERY COLLINS, also known as “Disciple,” then resided, a 9mm pistol with suppressor, said firearm having been manufactured and obtained by the defendants outside the State of North Carolina, in violation of Title 18, United States Code, Sections 922(a)(3) and 924(a)(1)(D) and 2.

### **COUNT FOUR**

27. On or about September 11, 2020, in the Eastern District of North Carolina and elsewhere, the defendants, LIAM MONTGOMERY COLLINS, also known as “Disciple,” and PAUL JAMES KRYSCUK, also known as “Deacon,” aiding and abetting one another, knowingly transported and delivered from Idaho to Pennsylvania, in interstate commerce, a firearm, specifically, a weapon made from a rifle modified to have an overall length of less than 26 inches or a barrel or barrels of less than 16 inches in length, not registered as required by Chapter 53 of Title 26, in violation of Title 26, United States Code, Sections 5841, 5861(j), and 5871, and 18 U.S.C. § 2.

### **COUNT FIVE**

28. Paragraphs 1 through 20 are realleged and incorporated as if stated

herein.

29. Beginning in or about June 2019, and continuing to the present, in the Eastern District of North Carolina and elsewhere, the defendants, LIAM MONTGOMERY COLLINS, also known as “Disciple,” PAUL JAMES KRYSCUK, also known as “Deacon,” JORDAN DUNCAN, also known as “Soldier,” and JOSEPH MAURINO, also known as “Bishop” willfully and knowingly conspired and agreed to willfully and knowingly damage and attempt to damage the property of an energy facility of the United States involved in the transmission and distribution of electricity, in an amount exceeding or which would have exceeded \$100,000, in violation of Title 18, United States Code, Section 1366(a).

#### **PURPOSE OF THE CONSPIRACY**

30. It was the purpose of the conspiracy for the defendants, LIAM MONTGOMERY COLLINS, also known as “Disciple,” PAUL JAMES KRYSCUK, also known as “Deacon,” JORDAN DUNCAN, also known as “Soldier,” and JOSEPH MAURINO, also known as “Bishop,” to attack the power grid both for the purpose of creating general chaos and to provide cover and ease of escape in those areas in which they planned to undertake assassinations and other desired operations to further their goal of creating a white ethno-state.

#### **OVERT ACTS**

31. In furtherance of the conspiracy and to achieve the object thereof, at least one of the following overt acts, among others, were committed by the defendants LIAM MONTGOMERY COLLINS, also known as “Disciple,” PAUL JAMES

KRYSCUK, also known as “Deacon,” JORDAN DUNCAN, also known as “Soldier,” and/or JOSEPH MAURINO, also known as “Bishop” in the Eastern District of North Carolina and elsewhere, between 2017 and the present:

A. In 2017, Defendant LIAM MONTGOMERY COLLINS, also known as “Disciple,” entered the U.S. Marines for the “experience and training,” to benefit his stated long-range plan for the group and COLLINS was stationed at Camp LeJeune, North Carolina.

B. In or about 2017, Defendant PAUL JAMES KRYSCUK, also known as “DEACON,” began manufacturing firearms and firearm accessories.

C. In 2018, LIAM MONTGOMERY COLLINS, also known as “Disciple,” recruited JORDAN DUNCAN, also known as “Soldier,” who was then stationed at Camp LeJeune, North Carolina, as a member of the group with experience in communications.

D. Between on or about November 2017 and August 2020, while aboard Camp LeJeune, North Carolina, COLLINS stole military gear, to include body armor and magazines for assault-type rifles, and had them delivered to other members of the group.

E. In or about February 2020 defendant PAUL JAMES KRYSCUK, also known as “DEACON,” moved from New York to Boise, Idaho.

F. Between on or about 2017 and 2018, while serving in the Marine Corps and assigned to 2d Radio Battalion, II MEF, Camp LeJeune, North Carolina, JORDAN DUNCAN, also known as “Soldier,” gathered a library of

information, some military-owned and some publicly available, regarding various weaponry, to include firearms, explosives, and even nerve toxins. From that time to October of 2020, he maintained and shared that information with co-conspirators, to include LIAM MONTGOMERY COLLINS, also known as “Disciple” and PAUL JAMES KRYSCUK, also known as “Deacon.”

G. PAUL JAMES KRYSCUK, also known as “Deacon,” between February and July of 2020, further distributed that information to T.C., and encouraged T.C. in the practice and use of building explosive devices in particular.

H. LIAM MONTGOMERY COLLINS, also known as “Disciple,” PAUL JAMES KRYSCUK, also known as “Deacon,” JORDAN DUNCAN, also known as “Soldier,” and JOSEPH MAURINO, also known as “Bishop,” researched, discussed and critically reviewed at length a previous attack on the power grid by an unknown group. That group used assault-style rifles in an attempt to explode a power substation.

I. JUSTIN HERMANSON, a/k/a “Sandman,” showed M.W. an animated re-enactment of that attack, and told M.W. that if his group would manage to blow up one of these substations, it would take down the entire regional or coastal power grid and cause chaos for the country.

J. LIAM MONTGOMERY COLLINS, also known as “Disciple,” PAUL JAMES KRYSCUK, also known as “Deacon,” JORDAN DUNCAN, also known as “Soldier,” and JOSEPH MAURINO, also known as “Bishop,” discussed using

homemade thermite to burn through and destroy power transformers. Thermite is a combination of metal powder and metal oxide which burns at temperatures over 4000° Fahrenheit.

K. Between on or about July 2020 through October 2020, COLLINS asked HERMANSON and M.W. each to purchase 50 pounds of Tannerite for the group. Tannerite is a binary explosive containing aluminum powder and oxidizers, and can be used to make Thermite.

L. Between on or about October 4, 2020 and October 9, 2020, LIAM MONTGOMERY COLLINS, also known as “Disciple,” PAUL JAMES KRYSCUK, also known as “Deacon,” and JORDAN DUNCAN, also known as “Soldier,” discussed their plans to take out the power grid.

M. A handwritten list of approximately one dozen intersections and places in Idaho and surrounding states was possessed by KRYSCUK on October 20, 2020. Each listed intersection and/or place contained a transformer, substation, or other component of the power grid for the northwest United States, that if destroyed could cause damage exceeding \$100,000 to the power grid.

All in violation of Title 18, United States Code, Section 1366(a).



## FORFEITURE NOTICE

Notice is hereby given that all right, title and interest in the property described herein is subject to forfeiture.

Upon conviction of any Federal crime of terrorism (as defined in section 2332b(g)(5)), the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(G), as made applicable by 28 U.S.C. § 2461(c), all assets, foreign or domestic: (i) of any individual, entity or organization engaged in planning or perpetrating the said offense, or affording any person a source of influence over any such entity or organization; (ii) acquired or maintained with the intent and for the purpose of supporting, planning, conducting, or concealing the said offense; and (iii) derived from, involved in, or used or intended to be used to commit the said offense.

Upon conviction of any violation of the Gun Control Act, the National Firearms Act, or any other offense charged herein that involved or was perpetrated in whole or in part by the use of firearms or ammunition, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and/or 26 U.S.C. § 5872, as made applicable by 28 U.S.C. § 2461(c), any and all firearms and ammunition that were involved in or used in a knowing or willful commission of the offense, or, pursuant to 18 U.S.C. § 3665, that were found in the possession or under the immediate control of the defendant at the time of arrest.

The forfeitable property includes, but is not limited to, the following:

Personal Property:

- a) One 9mm pistol and suppressor, not serialized, seized on June 18, 2020

from JUSTIN WADE HERMANSON, also known as "Sandman" and any and all associated ammunition.

If any of the above-described forfeitable property, as a result of any act or omission of a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

A TRUE BILL

**REDACTED VERSION**

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

~~FOREPERSON~~

8/18/2021  
DATE

G. NORMAN ACKER, III  
Acting United States Attorney

Barbara D. Kocher  
BY: BARBARA D. KOCHER  
Assistant United States Attorney