

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

UNITED STATES OF AMERICA	)	
	)	No. 26-cr-46-PB-TSM-01/02
v.	)	
	)	Count 1: Conspiracy to Interfere with
	)	Commerce by Robbery
	)	(18 U.S.C. § 1951(a))
JAMES FERGUSON, and	)	
RICHARD CONNER	)	
	)	
Defendants	)	

INDICTMENT

The Grand Jury charges:

Count One

[Conspiracy to Interfere With Commerce by Robbery]
[18 U.S.C. § 1951(a)]

By at least on or about March 15, 2026, in the District of New Hampshire, and elsewhere,
the defendants,

JAMES FERGUSON, and RICHARD CONNER,

did knowingly and willfully combine, conspire, confederate, and agree together and with each other, and with other persons known and unknown to the Grand Jury to unlawfully obstruct, delay, and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that the defendants conspired to take and obtain property, including cigarettes, from in the presence of an employee of T-Bird Mini Marts Global Partners, LP, located in Hinsdale, New Hampshire, a commercial enterprise engaged in the sale of items which traveled in and affected interstate commerce, against the will of the employee by means of actual and threatened force,

violence, and fear of injury, immediate and future, to the person of the employee.

In violation of Title 18, United States Code, Section 1951(a).

FORFEITURE ALLEGATION

The allegations of Count One of this Indictment are hereby re-alleged as if fully set forth herein and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C), 18 U.S.C. § 924, and 28 U.S.C. § 2461.

Upon conviction of the offense alleged in Count One of this Indictment, the defendants, JAMES FERGUSON and RICHARD CONNER, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C), and 28 U.S.C. § 2461, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the charged offenses.

The defendants shall also forfeit, pursuant to 18 U.S.C. § 924 and 28 U.S.C. § 2461(c) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the charged offenses.

Date: June 17, 2026

A TRUE BILL

/s/ Foreperson

Foreperson of the Grand Jury

ERIN CREEGAN
United States Attorney

By: /s/ Christopher Marin
Christopher Marin
Special Assistant United States Attorney

/s/ Charles DeJoie
Charles DeJoie
Assistant U.S. Attorney