

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

UNDER SEAL

UNITED STATES OF AMERICA

3:16-CR-00051-BR

v.

AMMON BUNDY,
JON RITZHEIMER,
JOSEPH O'SHAUGHNESSY,
RYAN PAYNE,
RYAN BUNDY,
BRIAN CAVALIER,
SHAWNA COX,
PETER SANTILLI,
JASON PATRICK,
DUANE LEO EHMER,
DYLAN ANDERSON,
SEAN ANDERSON,
DAVID LEE FRY,
JEFF WAYNE BANTA,
SANDRA LYNN ANDERSON,
KENNETH MEDENBACH,
BLAINE COOPER,
WESLEY KJAR,
COREY LEQUIEU,
NEIL WAMPLER,
JASON CHARLES BLOMGREN,
DARRYL WILLIAM THORN,
GEOFFREY STANEK,
TRAVIS COX,
ERIC LEE FLORES, and
JAKE RYAN,

SUPERSEDING INDICTMENT

18 U.S.C. § 372
18 U.S.C. § 930(b)
18 U.S.C. § 924(c)(1)(A)
18 U.S.C. § 641
18 U.S.C. § 1361
18 U.S.C. § 2

UNDER SEAL

Defendants.

THE GRAND JURY CHARGES:

COUNT 1
(Conspiracy to Impede Officers of the United States)
(18 U.S.C. § 372)

On or about November 5, 2015, and continuing through February 12, 2016, in the District of Oregon, defendants **AMMON BUNDY, JON RITZHEIMER, JOSEPH O'SHAUGHNESSY, RYAN PAYNE, RYAN BUNDY, BRIAN CAVALIER, SHAWNA COX, PETER SANTILLI, JASON PATRICK, DUANE LEO EHMER, DYLAN ANDERSON, SEAN ANDERSON, DAVID LEE FRY, JEFF WAYNE BANTA, SANDRA LYNN ANDERSON, KENNETH MEDENBACH, BLAINE COOPER, WESLEY KJAR, COREY LEQUIEU, NEIL WAMPLER, JASON CHARLES BLOMGREN, DARRYL WILLIAM THORN, GEOFFREY STANEK, TRAVIS COX, ERIC LEE FLORES,** and **JAKE RYAN** did knowingly and willfully conspire and agree together and with each other and with persons known and unknown to the Grand Jury to prevent by force, intimidation, and threats, officers and employees of the United States Fish and Wildlife Service and the Bureau of Land Management, agencies within the United States Department of the Interior, from discharging the duties of their office at the Malheur National Wildlife Refuge and other locations in Harney County, Oregon, in violation of Title 18, United States Code, Section 372.

In furtherance of the conspiracy and to effect the illegal objects thereof, one or more of the defendants and one or more of the conspirators performed the following overt acts in the District of Oregon and elsewhere, including but not limited to the following:

- a. On or about November 5, 2015, Ammon Bundy and Ryan Payne traveled to Harney County, Oregon, to warn the Harney County sheriff of "extreme civil unrest" if certain demands were not met.

b. Beginning in or about November 2015, defendants and conspirators recruited and encouraged other individuals, known and unknown to the grand jury, in person and through social media and other means of communication, to participate and assist in the above-described conspiracy.

c. In or about November 2015 continuing through January 26, 2016, defendants and conspirators traveled to Harney County, Oregon, to intimidate and coerce the population of Harney County, Oregon, in order to effectuate the goals of the conspiracy.

d. Beginning on December 15, 2015, defendants and conspirators brandished and carried firearms throughout Harney County, Oregon, in order to effectuate the goals of the conspiracy.

e. Beginning on January 2, 2016, defendants and conspirators occupied the Malheur National Wildlife Refuge by force while using and carrying firearms.

f. Beginning on January 2, 2016, defendants and conspirators brandished and carried firearms on the premises of the Malheur National Wildlife Refuge and prevented federal officials from performing their official duties by force, threats, and intimidation.

g. Beginning on January 2, 2016, defendants and conspirators refused to leave the Malheur National Wildlife Refuge and allow federal officials to return to their official duties.

h. Beginning on January 2, 2016, defendants and conspirators threatened violence against anybody who attempted to remove them from the Malheur National Wildlife Refuge.

COUNT 2
(Possession of Firearms and Dangerous Weapons in Federal Facilities)
(18 U.S.C. §§ 930(b) and 2)

On or about January 2, 2016, and continuing through February 12, 2016, in the District of Oregon, defendants **AMMON BUNDY, JON RITZHEIMER, RYAN PAYNE, RYAN BUNDY, BRIAN CAVALIER, SHAWNA COX, JASON PATRICK, DYLAN ANDERSON, SEAN ANDERSON, DAVID LEE FRY, JEFF WAYNE BANTA, SANDRA LYNN ANDERSON, WESLEY KJAR, COREY LEQUIEU, JASON CHARLES BLOMGREN, DARRYL WILLIAM THORN, GEOFFREY STANEK, TRAVIS COX, ERIC LEE FLORES, and JAKE RYAN**, aided and abetted by each other and by others known and unknown to the grand jury, did knowingly possess or cause to be present a firearm or dangerous weapon in a federal facility located at the Malheur National Wildlife Refuge, and counseled, commanded, induced and procured the commission thereof, with the intent that the firearm or dangerous weapon be used in the commission of a crime, to wit: 18 U.S.C. § 372, Conspiracy to Impede Officers of the United States, in violation of Title 18, United States Code, Sections 930(b) and 2.

COUNT 3
(Use and Carry of a Firearm in Relation to a Crime of Violence)
(18 U.S.C. §§ 924(c)(1)(A) and 2)

On or about January 2, 2016, and continuing through February 12, 2016, in the District of Oregon, defendants **AMMON BUNDY, JON RITZHEIMER, RYAN PAYNE, RYAN BUNDY, BRIAN CAVALIER, JASON PATRICK, SEAN ANDERSON, DAVID LEE FRY, and COREY LEQUIEU**, aided and abetted by each other and by others known and unknown to the grand jury, did knowingly use and carry firearms during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is,

Conspiracy to Impede Officers of the United States, in violation of 18 U.S.C. § 372, and counseled, commanded, induced each other and procured the commission thereof, in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT 4
(Theft of Government Property)
(18 U.S.C. § 641)

On or about January 15, 2016, in the District of Oregon, defendant **KENNETH MEDENBACH**, willfully and knowingly, did steal, convert, purloin, and convert for his own use a 2012 Ford F-350 Truck, license plate I581021, the value of which exceeded \$1000, which is property of the United States government, United States Fish and Wildlife Service, in violation of Title 18, United States Code, Section 641.

COUNT 5
(Theft of Government Property)
(18 U.S.C. § 641)

On or about January 15, 2016, in the District of Oregon, defendants **JON RITZHEIMER** and **RYAN BUNDY**, willfully and knowingly, did steal, purloin, and convert to their use and the use of another cameras and related equipment, the value of which exceeded \$1000, which is property of the United States government, in violation of Title 18, United States Code, Section 641.

COUNT 6
(Depredation of Government Property)
(18 U.S.C. §§ 1361 and 2)

On or about January 27, 2016, in the District of Oregon, defendants **SEAN ANDERSON** and **JAKE RYAN**, aided and abetted by each other, did willfully and by means of excavation and the use of heavy equipment on lands of the Malheur National Wildlife Refuge, property of the United States, injure and commit a depredation against such property, specifically, an

archaeological site considered sacred to the Burns Paiute Tribe, resulting in damage in an amount exceeding \$1000, in violation of Title 18, United States Code, Sections 1361 and 2.

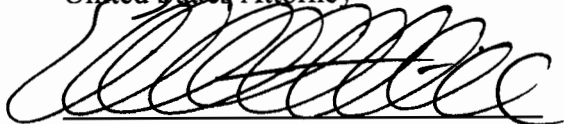
Dated this 8 day of March 2016.

A TRUE BILL.

OFFICIATING FOREPERSON

Presented by:

BILLY J. WILLIAMS
United States Attorney



ETHAN D. KNIGHT
GEOFFREY A. BARROW
CRAIG J. GABRIEL
Assistant United States Attorneys