

Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington.

August 14 2024  
By Ravi Subramanian, Clerk  
[Signature] Deputy

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

UNITED STATES OF AMERICA,  
Plaintiff

NO. **CR 24 - 138 RSM**

**INDICTMENT**

v.

KEVIN THISSEL (aka: "Unc," "Uncle," "Jefe," "Big Jefe,"), and  
CHRISTOPHER JOHNSON,  
Defendants.

The Grand Jury charges that:

**INTRODUCTION**

At all times relevant to this Indictment, unless otherwise indicated:

**A. The Enterprise**

1. The defendants, KEVIN THISSEL, CHRISTOPHER JOHNSON, and others known and unknown to the Grand Jury, were members and associates of a criminal organization, which was engaged in, among other things, acts of violence, robbery, kidnapping, murder, and burglary, and which operated in the states of Washington, Arizona, and elsewhere.

1           2.     The organization, including its leaders, members, and associates,  
2 constituted an “enterprise” as defined in Title 18, United States Code, Section 1961(4),  
3 that is, a group of individuals associated in fact that engaged in, and the activities of  
4 which affected, interstate and foreign commerce (the Enterprise). The Enterprise  
5 constituted an ongoing organization whose members and associates functioned as a  
6 continuing unit for a common purpose of achieving the objectives of the enterprise. The  
7 Enterprise operated in the Western District of Washington and elsewhere.

8           3.     Enterprise members and associates identified robbery and burglary targets  
9 throughout the Western District of Washington, then gathered together to commit each  
10 robbery or burglary. These robbery crews often consisted of at least three to four  
11 Enterprise members.

12           4.     The Enterprise often targeted Asian families and victims for robbery and  
13 burglary.

14           5.     The Enterprise utilized a common *modus operandi* for the robberies.  
15 Enterprise members wore dark clothing, masks, and gloves to conceal their identities and  
16 to leave limited trace evidence. They commonly carried firearms. They conducted their  
17 robberies late at night and in the early morning hours (usually between 2:00 am and 5:00  
18 am), when they knew or had reason to believe victims would be present in the targeted  
19 residences. An Enterprise member usually disabled any apparent security cameras. One  
20 member of the Enterprise forced entry into the residence, usually by kicking in an entry  
21 door. Enterprise members often falsely announced themselves as police. Once Enterprise  
22 members made entry into the home of their intended victims, they corralled the victims,  
23 including minor children. The members restrained victims, including minor children, and  
24 virtually always did so with zip ties.

1           6.     KEVIN THISSEL was the oldest member of the Enterprise. He was known  
2 as, and referred to himself as, “Jefe” and “Big Jefe,” which are terms denoting leadership.  
3 Other members of the Enterprise referred to him as “Uncle,” or “Unc.”

4           7.     Enterprise members and associates were assigned the following roles  
5 during their commission of robberies and burglaries, with the same member(s) or  
6 associate(s) often taking on multiple roles during a particular robbery or burglary:

7           (a)    An Enterprise member selected and targeted victims for robbery and  
8 burglary;

9           (b)    One Enterprise member was the driver;

10          (c)    One Enterprise member was responsible for gaining entry into the home,  
11 usually by kicking in a door;

12          (d)    One or two Enterprise members were responsible for controlling victims by  
13 zip-tying victims;

14          (e)    One or two Enterprise members were responsible for controlling victims by  
15 holding victims at gunpoint;

16          (f)    Once the victims were secured, Enterprise members were responsible for  
17 ransacking homes and finding items of value for theft and robbery;

18          (g)    Certain juveniles, known to the Grand Jury, assisted the Enterprise by  
19 taking possession of property stolen by the Enterprise, including stolen motor vehicles,  
20 and by conveying messages for Enterprise members.

21          (h)    Other associates assisted the Enterprise by allowing their residences to be  
22 used to store firearms for, and property stolen by, the Enterprise, and for planning  
23 robberies and burglaries by Enterprise members.

1           8.     The Enterprise members and associates stole money, jewelry, identity  
2 documents, luxury handbags and purses, motor vehicles, clothing, and other items of  
3 potential value, during the robberies.

4 **B.     Purposes of the Enterprise**

5           9.     The purposes of the Enterprise included, but were not limited to, the  
6 following:

7           (a)    Enriching the leaders, members, and associates of the Enterprise through,  
8 among other things, acts of robbery, theft, and burglary; and

9           (b)    Instilling fear in victims, and seeking to intimidate victims through acts of  
10 murder, kidnapping, and other acts and threats of violence to facilitate the commission of  
11 robberies and threats of violence in order to keep victims from reporting the Enterprise's  
12 illegal activities to law enforcement.

13 **C.     Means and Methods of the Enterprise**

14           10.    The means and methods by which members and associates of the Enterprise  
15 conducted and participated in the conduct of the affairs of the Enterprise included, but  
16 were not limited to, the following:

17           (a)    Enterprise members often targeted Asian victims for robberies because  
18 Enterprise members perceived Asian victims to be “weaker;”

19           (b)    Enterprise members and their associates identified victims and their  
20 residential addresses in the Western District of Washington, sometimes doing so  
21 through research on social media;

22           (c)    Once the victims were identified, enterprise members organized plans to  
23 rob the victims of cash, jewelry, identity documents, and other property of  
24 perceived value from the victims’ residences;

25           (d)    Enterprise members conducted surveillance of some of the victim  
26 residences before the robberies, and examined suitable entries to the homes;

27

1 (e) In preparation for each robbery, Enterprise members donned dark clothing  
2 and masks, and armed themselves with firearms (to which flashlights were often  
3 affixed) and zip ties;

4 (f) Enterprise members and their associates chose the late hours of the night  
5 and early morning hours to commit their robberies in order to increase the  
6 likelihood victims would be present, in order maximize fear in their victims, and  
7 so victims could help Enterprise members locate property and valuables inside the  
8 residences;

9 (g) Enterprise members and their associates forcibly entered the residences of  
10 the victims, typically by kicking in an entrance door to the residence;

11 (h) Enterprise members and their associates used violence, threats of violence,  
12 and weapons, including firearms, to commit the predicate acts specified below;

13 (i) Enterprise members committed acts of kidnapping to achieve the purposes  
14 of the Enterprise;

15 (j) Enterprise members took one victim, using force and threats of force, to  
16 ATM machines, operated by banks conducting business in interstate commerce, in  
17 an effort to steal funds from the victim;

18 (k) Enterprise members committed an act of murder to achieve the purposes of  
19 the Enterprise;

20 (l) Enterprise members and their associates often used mobile phones, with  
21 service provided by companies operating in interstate commerce, to communicate  
22 with one another before, during, and after the robberies.

23 (m) Enterprise members and their associates used vehicles rented from a  
24 company operating in interstate commerce, as well as personal vehicles, to commit  
25 the robberies.

1 **COUNT ONE**

2 **(Racketeering)**

3 11. The allegations contained in paragraphs 1 through 10 of this Indictment are  
4 re-alleged and incorporated as if fully set forth herein.

5 12. Beginning on a date unknown, but at least from in or about March 2022 and  
6 in or about December 2022, both dates being approximate and inclusive, in Skagit, King,  
7 and Snohomish Counties, within the Western District of Washington, and elsewhere,  
8 KEVIN THISSEL, CHRISTOPHER JOHNSON, and others known and unknown to the  
9 Grand Jury, each being a person employed by and associated with the Enterprise  
10 described above, and which Enterprise engaged in, and the activities of which affected,  
11 interstate commerce, did knowingly and intentionally conduct and participate, directly  
12 and indirectly, in the conduct of the affairs of the Enterprise through a pattern of  
13 racketeering activity, as that term is defined in Title 18, United States Code, Sections  
14 1961(1) and 1961(5), consisting of the racketeering acts set forth below.

15 **Racketeering Act 1: Robbery of D.N., H.T., L.T., and A.T.**

16 13. On or about May 24, 2022, in Mount Vernon, Skagit County, within the  
17 Western District of Washington, KEVIN THISSEL, CHRISTOPHER JOHNSON, and  
18 others known and unknown to the Grand Jury, each aided and abetted by the other,  
19 knowingly, intentionally, and unlawfully did take personal property from the person of  
20 another, and in the presence of said person, to wit: D.N., H.T., L.T., and A.T., against  
21 their will by the use and threatened use of immediate force, violence, and fear of injury to  
22 that person and their property, and during the commission of said robbery and in  
23 immediate flight therefrom, KEVIN THISSEL, CHRISTOPHER JOHNSON, and others  
24 known and unknown to the Grand Jury, were armed with a deadly weapon, and displayed  
25 what appeared to be a firearm or other deadly weapon, in violation of Revised Code of  
26 Washington 9A.56.190, 9A.56.200(1)(a)(i) and (ii), and 9A.08.020.

1           **Racketeering Act 2:           Kidnapping of A.T.**

2           14.    On or about May 24, 2022, in Mount Vernon, Skagit County, within the  
3 Western District of Washington, KEVIN THISSEL, CHRISTOPHER JOHNSON, and  
4 others known and unknown to the Grand Jury, each aided and abetted by the other, did  
5 intentionally abduct A.T., a minor child, with the intent to facilitate the commission of a  
6 felony, that is: the robbery of D.N., H.T., L.T., and A.T, as set forth in Racketeering  
7 Act 1, in violation of Revised Code of Washington 9A.40.020(1)(b) and 9A.08.020.

8           **Racketeering Act 3:           Robbery of K.M. and F.P.-D.**

9           15.    On or about July 14, 2022, in Burien, King County, within the Western  
10 District of Washington, CHRISTOPHER JOHNSON, and others known and unknown to  
11 the Grand Jury, each aided and abetted by the other, knowingly, intentionally, and  
12 unlawfully did take personal property from the person of another, and in the presence of  
13 said person, to wit: K.M. and F.P.-D., against their will by the use and threatened use of  
14 immediate force, violence, and fear of injury to that person and their property, and during  
15 the commission of said robbery and in immediate flight therefrom, CHRISTOPHER  
16 JOHNSON, and others known and unknown to the Grand Jury, were armed with a deadly  
17 weapon, and displayed what appeared to be a firearm or other deadly weapon, in  
18 violation of Revised Code of Washington 9A.56.190, 9A.56.200(1)(a)(i) and (ii), and  
19 9A.08.020.

20           **Racketeering Act 4:           Robbery of Q.L.**

21           16.    On or about July 28, 2022, in Kent, King County, within the Western  
22 District of Washington, KEVIN THISSEL, CHRISTOPHER JOHNSON, and others  
23 known and unknown to the Grand Jury, each aided and abetted by the other, knowingly,  
24 intentionally, and unlawfully did take personal property from the person of another, and  
25 in the presence of said person, to wit: Q.L., against her will, by the use and threatened use  
26 of immediate force, violence, and fear of injury to that person and her property, and  
27

1 during the commission of said robbery and in immediate flight therefrom, KEVIN  
2 THISSEL, CHRISTOPHER JOHNSON, and others known and unknown to the Grand  
3 Jury, were armed with a deadly weapon, and displayed what appeared to be a firearm or  
4 other deadly weapon, in violation of Revised Code of Washington 9A.56.190,  
5 9A.56.200(1)(a)(i) and (ii), and 9A.08.020.

6 **Racketeering Act 5: Kidnapping of Q.L.**

7 17. On or about July 28, 2022, in Kent, King County, within the Western  
8 District of Washington, and elsewhere, KEVIN THISSEL, CHRISTOPHER JOHNSON,  
9 and others known and unknown to the Grand Jury, each aided and abetted by the other,  
10 did intentionally abduct Q.L., with the intent to facilitate the commission of a felony, that  
11 is: the robbery of Q.L. as set forth in Racketeering Act 4, above, in violation of Revised  
12 Code of Washington 9A.40.020(1)(b) and 9A.08.020.

13 **Racketeering Act 6: Robbery of M.S. and G.S.**

14 18. On or about August 19, 2022, in Everett, Snohomish County, within the  
15 Western District of Washington, KEVIN THISSEL, CHRISTOPHER JOHNSON, and  
16 others known and unknown to the Grand Jury, each aided and abetted by the other,  
17 knowingly, intentionally, and unlawfully did take personal property from the person of  
18 another, and in the presence of said person, to wit: M.S. and G.S., against their will by the  
19 use and threatened use of immediate force, violence, and fear of injury to that person and  
20 their property, and during the commission of said robbery and in immediate flight  
21 therefrom, KEVIN THISSEL, CHRISTOPHER JOHNSON, and others known and  
22 unknown to the Grand Jury, were armed with a deadly weapon, and displayed what  
23 appeared to be a firearm or other deadly weapon, in violation of Revised Code of  
24 Washington 9A.56.190, 9A.56.200(1)(a)(i) and (ii), and 9A.08.020.



**Racketeering Act 7: Murder of Irah Marcelo Sok**

19. On or about August 19, 2022, in Everett, Snohomish County, within the Western District of Washington, KEVIN THISSEL, CHRISTOPHER JOHNSON, and others known and unknown to the Grand Jury, each aided and abetted by the other, during the commission of robbery in the first degree, to wit: the robbery of M.S. and G.S., as set forth in Racketeering Act 6, above, and in the course of and in furtherance of such crime, did cause the death of a person other than one of the participants in the crime, that is: Irah Marcelo Sok, in violation of Revised Code of Washington 9A.32.030(1)(c)(1), 9A.56.200(1)(a)(i) and (ii), and 9A.08.020.

All in violation of Title 18, United States Code, Sections 1962(c) and 1963.

**COUNT 2**

**(Conspiracy to Commit RICO)**

20. The allegations contained in paragraphs 1 through 10 of this Indictment are hereby re-alleged and incorporated as if fully set forth herein.

21. Beginning on a date unknown, but at least from in or about March 2022 and continuing until in or around December 2022, both dates being approximate and inclusive, within the Western District of Washington and elsewhere, the defendants, KEVIN THISSEL, CHRISTOPHER JOHNSON, and others known and unknown to the Grand Jury, each being a person employed by and associated with the Enterprise described above, an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, did knowingly and intentionally combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate directly and indirectly, in the conduct of the affairs of the Enterprise, through a pattern of racketeering activity, as defined in Title 18, United States Code, Section 1961(1) and (5), which pattern of racketeering activity consisted of racketeering acts set forth in paragraphs 13 through 19 of Count One of this

1 Indictment, as Racketeering Acts 1 through 7, which are realleged and incorporated as if  
2 fully set forth in this paragraph.

3 22. It was further part of the conspiracy that each defendant agreed that a  
4 conspirator would commit at least two acts of racketeering activity in the conduct of the  
5 affairs of the Enterprise.

6 **Special Sentencing Factor as to Count Two:**

7 23. On or about August 19, 2022, in Everett, Snohomish County, within the  
8 Western District of Washington, KEVIN THISSEL, CHRISTOPHER JOHNSON, and  
9 others known and unknown to the Grand Jury, each aided and abetted by the other,  
10 during the commission of Robbery in the First Degree, to wit the robbery of M.S. and  
11 G.S., and in the course of and in furtherance of such crime, did cause the death of a  
12 person other than one of the participants in that crime, that is: Irah Marcelo Sok, in  
13 violation of Revised Code of Washington 9A.32.030(1)(c)(1), 9A.56.200(1)(a)(i) and (ii),  
14 and 9A.08.020.

15 All in violation of Title 18, United States Code, Sections 1962(d) and 1963.

16 **FORFEITURE ALLEGATION**

17 24. The allegations contained this Indictment are hereby realleged and  
18 incorporated by reference for the purpose of alleging forfeiture.

19 25. The United States hereby gives notice to the defendants charged in Count  
20 One and Two that, upon their conviction of offenses alleged in Counts One and/or Two,  
21 the government will seek forfeiture in accordance with Title 18, United States Code,  
22 Section 1963, which requires any person convicted of such offense to forfeit: (1) any  
23 interest the person acquired or maintained in violation of Title 18, United States Code,  
24 Section 1962; (2) any interest in, security of, claim against, or property or contractual  
25 right of any kind affording a source of influence over, any enterprise which the person  
26 has established, operated, or participated in the conduct of, in violation of Title 18,  
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1 United States Code, Section 1962; and (3) any property constituting, or derived from, any  
2 proceeds which the person obtained, directly or indirectly, from racketeering activity in  
3 violation of Title 18, United States Code, Section 1962.

4 26. **Substitute Assets.** If any of the above-described forfeitable property, as a  
5 result of any act or omission of the defendant,

- 6 a. cannot be located upon the exercise of due diligence;
- 7 b. has been transferred or sold to, or deposited with, a third party;
- 8 c. has been placed beyond the jurisdiction of the Court;
- 9 d. has been substantially diminished in value; or,
- 10 e. has been commingled with other property which cannot be divided  
11 without difficulty,

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1 it is the intent of the United States to seek the forfeiture of any other property of the  
2 defendant, up to the value of the above-described forfeitable property, pursuant to  
3 Title 21, United States Code, Section 853(p), and Title 18, United States Code, Section  
4 1963(m).

6 A TRUE BILL:

7 DATED: 8/14/24

8 *Signature of Foreperson redacted pursuant*  
9 *to the policy of the Judicial Conference of*  
10 *the United States.*

11 FOREPERSON

12  
13   
14 TESSA M. GORMAN  
15 United States Attorney

16   
17 MIKE LANG  
18 Assistant United States Attorney

19   
20 STEPHEN HOBBS  
21 Assistant United States Attorney