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UNITED STATES OF AMERICA

Plaintiff,

v.

JAMES PENDLETON,
a/k/a "J.P.,"
REUBEN PAPPAN,
a/k/a "Butch,"
PHILIP FORTMAN
JOHN HARPER
a/k/a "Turtle,"
PAUL SCHNEIDER,
a/k/a "Cornfed,"
BRENDA MOORE,
ROBERT SHIELDS,
a/k/a "Bobby Ray," and
MARK GLASS,
a/k/a "Buzzard,"

Defendants.

CR No. 01 - 0319

18 U.S.C. §1962(d)
Conspiracy to Conduct the Affairs of
an Enterprise through a Pattern of
Racketeering Activity

18 U.S.C. §1962(c)
Conduct of the Affairs of
an Enterprise through a Pattern of
Racketeering Activity

18 U.S.C. §1959(a)(5)
Conspiracy to Murder in Aid of
Racketeering Activity

18 U.S.C. §1959(a)(5)
Attempted Murder in Aid of
Racketeering Activity

SAN FRANCISCO VENUE
UNDER SEAL

INDICTMENT

INDICTMENT

FILED 11-2-16
DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SEALED
BY COURT ORDER

SEALED
BY COURT ORDER

1 The Grand Jury charges:

2 BACKGROUND

3 At all times relevant to this indictment:

4 1. The Aryan Brotherhood was a criminal organization, founded in approximately the late
5 1970's, which operated principally in California, including within California correctional
6 institutions. The organization provided its members with protection from rival organizations and
7 gangs both inside and outside of prison. Members and associates of the Aryan Brotherhood
8 engaged in acts of violence, including murder, robbery, and narcotics distribution on behalf of the
9 organization. All Aryan Brotherhood members were required to contribute one-third of any
10 earnings, whether from lawful or unlawful means, to the organization.

11 2. Individuals could join the Aryan Brotherhood only if sponsored by two ranking members.
12 Membership was approved only after a prospect had completed sufficient "work," i.e., engaged in
13 criminal activities, such as the manufacture of prison weapons, the commission of assaults,
14 robberies, murder, or narcotics distribution. The perpetration of violent crimes was a prerequisite
15 to membership in the organization.

16 3. The leaders of the Aryan Brotherhood used an affiliated, subordinate organization known
17 as the Nazi Low Riders, as well as members of the "skinhead" movement to commit criminal
18 offenses sanctioned by the Aryan Brotherhood. The Nazi Low Riders, a prison organization
19 within the California correctional institutions, carried out the orders of the Aryan Brotherhood,
20 both inside and outside of prison, to commit robberies, drug transactions, and violent assaults.
21 Any prisoner of Caucasian descent, whether or not a member of the Nazi Low Riders, was known
22 as a potential recruit to commit criminal activity, or a "wood."

23 4. The "Commission," the organization's ruling body, was composed of three senior members
24 of the Aryan Brotherhood located in Pelican Bay State Prison, Crescent City, California.
25 Members of the Commission and other ranking gang members who sat on a "Council" located
26 outside of Pelican Bay resolved intra-gang disputes, approved new memberships, and authorized
27 actions against rival gangs or other individuals, including murder. The Commission and the
28 Council communicated its orders through written instructions known as "kites." Names of those

1 who refused to obey the orders of the Commission and those who sought to withdraw from the
2 organization were placed "in the hat," which meant that they were to be murdered.

3 ENTERPRISE

4 5. The Aryan Brotherhood, as well as its leadership, membership, and associates, constituted
5 an enterprise as defined and used in Title 18, United States Code, Section 1961(4), that is, a group
6 of individuals associated in fact that engaged in, and the activities of which affected, interstate and
7 foreign commerce (hereinafter collectively referred to as the "Aryan Brotherhood"). The Aryan
8 Brotherhood, through its members and associates, engaged in racketeering activity as defined and
9 used in Title 18, United States Code, Section 1961(1), namely, multiple acts involving murder
10 and robbery in violation of California state law, and multiple acts involving the distribution of
11 controlled substances in violation of Title 21, United States Code, Sections 841 and 846. The
12 Aryan Brotherhood conducted its activities within the Northern District of California and
13 elsewhere.

14 MEANS AND METHODS OF THE ENTERPRISE

15 6. Among the means and methods by which the defendants and others conducted and
16 participated in the conduct of the affairs of the Aryan Brotherhood were the following:

17 a. Members and associates of the Aryan Brotherhood committed, attempted, conspired
18 and threatened to commit acts of violence, including murder and assault, to promote and protect
19 the enterprise's criminal operation. Organization members who violated Aryan Brotherhood rules
20 and non-members who threatened or interfered with the enterprise's criminal activities were
21 subject to retaliation by assault and murder.

22 b. Members and associates of the Aryan Brotherhood supported themselves and the
23 organization through robberies of residential and commercial establishments as well as "home
24 invasion" robberies of drug dealers. Money earned from these robberies was used to pay
25 personal expenses and to purchase firearms and other items for use by the enterprise; drugs taken
26 in robberies were sold and the proceeds distributed to Aryan Brotherhood members. Members of
27 the Aryan Brotherhood were required to contribute one-third of robbery proceeds to the Aryan
28 Brotherhood .

1 c. Members and associates of the Aryan Brotherhood also distributed narcotics to generate
2 income for the enterprise, inside and outside of prison. Among the narcotics distributed were
3 methamphetamine and marijuana.

4 7. The defendants JAMES PENDLETON, a/k/a "J.P.," REUBEN PAPPAN, a/k/a "Butch,"
5 PHILIP FORTMAN, JOHN HARPER, a/k/a "Turtle," PAUL SCHNEIDER, a/k/a "Cornfed,"
6 ROBERT SHIELDS, a/k/a "Bobby Ray," and MARK GLASS, a/k/a "Buzzard," were members of
7 the Aryan Brotherhood.

8 8. The defendant BRENDA MOORE was an associate of the Aryan Brotherhood.

9
10 COUNT ONE: [18 U.S.C. §1962(d)]

11 9. Paragraphs one through eight of this Indictment are hereby realleged and incorporated as if
12 fully set forth herein.

13 10. From in or about and between 1986 and August 2001, both dates being approximate and
14 inclusive, in the Northern District of California and elsewhere, the defendants

15
16 JAMES PENDLETON,
a/k/a "J.P.,"
17 REUBEN PAPPAN,
a/k/a "Butch,"
18 PHILIP FORTMAN,
JOHN HARPER,
a/k/a "Turtle,"
19 PAUL SCHNEIDER,
a/k/a "Cornfed,"
20 BRENDA MOORE,
ROBERT SHIELDS,
21 a/k/a "Bobby Ray," and
22 MARK GLASS,
a/k/a "Buzzard,"

23 and others, being persons employed by and associated with an enterprise that engaged in, and the
24 activities of which affected, interstate commerce, namely, the Aryan Brotherhood, knowingly and
25 intentionally conspired to violate Title 18, United States Code, Section 1962(c), that is, to conduct
26 and participate, directly and indirectly, in the conduct of the affairs of the enterprise through a
27 pattern of racketeering activity, as that term is defined in Title 18, United States Code, Sections
28 1961(1) and 1961(5), consisting of multiple acts involving:

1 (a) murder, in violation of California Penal Code Sections 31, 182, 184 and 187 (Unlawful
2 Killing of a Human Being with Malice Aforethought—Murder; and Conspiracy to Commit
3 Murder);

4 (b) robbery, in violation of California Penal Code Sections 31, 182, 184, and 211
5 (Robbery; and Conspiracy to Commit Robbery); and

6 (c) distribution of, and conspiracy to distribute controlled substances, in violation of Title
7 21, United States Code, Sections 841(a)(1), (b)(1), and 846, and Title 18, United States Code,
8 Section 2.

9 It was a further part of the conspiracy that the defendants agreed that a conspirator would
10 commit at least two acts of racketeering in the conduct of the affairs of the enterprise.

11 All in violation of Title 18, United States Code, Section-1962(d).

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13 COUNT TWO: [18 U.S.C. §§1962(c), 2]

14 11. Paragraphs one through eight of this Indictment are hereby realleged and incorporated as
15 if fully set forth herein.

16 12. From in or about and between 1986 and August 2001, both dates being approximate and
17 inclusive, in the Northern District of California and elsewhere, the defendants

18 JAMES PENDLETON,
19 a/k/a "J.P.,"
20 REUBEN PAPPAN,
21 a/k/a "Butch,"
22 JOHN HARPER,
23 a/k/a "Turtle,"
24 PAUL SCHNEIDER,
25 a/k/a "Cornfed,"
26 BRENDA MOORE,
27 ROBERT SHIELDS,
28 a/k/a "Bobby Ray," and
MARK GLASS,
a/k/a "Buzzard,"

and others, being persons employed by and associated with an enterprise that engaged in, and the
activities of which affected, interstate commerce, namely, the Aryan Brotherhood, knowingly and
intentionally did conduct and participate, directly and indirectly, in the conduct of the affairs of
that enterprise through a pattern of racketeering activity, as that term is defined in Title 18, United

1 States Code, Sections 1961(1) and 1961(5), and as set forth below.

2 All in violation of Title 18, United States Code, Sections 1962(c) and 2.

3 THE PATTERN OF RACKETEERING ACTIVITY

4 13. The pattern of racketeering activity, as defined in Title 18, United States Code, Sections
5 1961(1) and 1961(5), consisted of the following acts:

6 Racketeering Act One

7 Conspiracy to Commit Robbery

8 14. From in or about and between April 1994 and July 1995, both dates being approximate
9 and inclusive, in the Northern and Central Districts of California and elsewhere, the defendants

10
11 PAUL SCHNEIDER,
12 a/k/a "Cornfed," and
13 BRENDA MOORE,

14 and others, knowingly and intentionally conspired to commit robbery, and a co-conspirator
15 committed an overt act in furtherance of the conspiracy, in violation of California Penal Code
16 Sections 31, 182, 184, and 211.

17 Racketeering Act Two

18 Conspiracy to Commit Robbery

19 15. From in or about and between mid-1995 to August 2001, both dates being approximate
20 and inclusive, in the Northern District of California and elsewhere, the defendant

21 ROBERT SHIELDS,
22 a/k/a "Bobby Ray,"

23 and others, knowingly and intentionally conspired to commit robbery, and a co-conspirator
24 committed an overt act in furtherance of the conspiracy, in violation of California Penal Code
25 Sections 31, 182, 184, and 211.

26 Racketeering Act Three

27 Conspiracy to Commit Robbery

28 16. From in or about and between 2000 to August 2001, both dates being approximate and
inclusive, in the Northern District of California and elsewhere, the defendant

JOHN HARPER,
a/k/a "Turtle,"

1 and others, knowingly and intentionally conspired to commit robbery, and a co-conspirator
2 committed an overt act in furtherance of the conspiracy, in violation of California Penal Code
3 Sections 31, 182, 184, and 211.

4 Racketeering Act Four

5 Attempted Murder of Correctional Officer Kropp

6 17. On or about July 7, 1987, in the Northern District of California, the defendant

7 PAUL SCHNEIDER,
8 a/k/a "Cornfed,"

9 knowingly and intentionally attempted to murder Correctional Officer C. Kropp, in violation of
10 California Penal Code Sections 21a, 31, 664, and 187.

11 Racketeering Act Five

12 Conspiracy to Commit Fraud Involving Credit Card Transactions

13 18. From in or about and between may 1994 and June 1994, both dates being approximate and
14 inclusive, in the Northern District of California and elsewhere, the defendant

15 BRENDA MOORE

16 and others, knowingly and intentionally conspired to defraud credit card holder Joyce Munger,
17 and a co-conspirator committed an overt act in furtherance of the conspiracy, in violation of Title
18 18, United States Code, Sections 1029 and 2.

19 Racketeering Act Six

20 Solicitation to Murder Joyce Munger

21 19. In or about June 1994, in the Northern District of California, the defendant

22 BRENDA MOORE,

23 with the intent that the crime be committed, knowingly and intentionally solicited another to
24 murder Joyce Munger, in violation of California Penal Code Sections 31, 653f, and 187.

25 Racketeering Act Seven

26 Conspiracy to Murder Ron Pruitt

27 20. From in or about and between June 1994 and July 20, 1994, both dates being approximate
28 and inclusive, in the Northern District of California and elsewhere, the defendants

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PAUL SCHNEIDER,
a/k/a "Cornfed," and
BRENDA MOORE,

and others, knowingly and intentionally conspired to murder Ron Pruitt, and a co-conspirator committed an overt act in furtherance of the conspiracy, in violation of California Penal Code Sections 31, 182, 184 and 187.

Racketeering Act Eight

Conspiracy to Murder Chris McDowell

21. From in or about and between 1992 and December 1993, both dates being approximate and inclusive, in the Northern District of California and elsewhere, the defendant

REUBEN PAPPAN,
a/k/a "Butch,"

and others, knowingly and intentionally conspired to murder Chris McDowell, who was incarcerated in Tehachapi State Prison, Tehachapi, California, and a co-conspirator committed an overt act in furtherance of the conspiracy, in violation of California Penal Code Sections 31, 182, 184 and 187.

Racketeering Act Nine

Murder of Sidney Hall, a/k/a "Mule"

22. On or about March 11, 1993, in the Central District of California, the defendant

REUBEN PAPPAN,
a/k/a "Butch,"

and others, unlawfully and with malice aforethought, did aid, abet, advise, encourage and otherwise willfully participate in the murder of Sidney Hall, a/k/a "Mule," in violation of California Penal Code Sections 31 and 187.

Racketeering Act Ten

Solicitation to Murder Terry Jones

23. On or about October 19, 1994, in the Northern District of California, the defendant

REUBEN PAPPAN,
a/k/a "Butch,"

with the intent that the crime be committed, knowingly and intentionally solicited another to murder Terry Jones, in violation of California Penal Code Sections 31, 653f, and 187.

1 Racketeering Act Eleven

2 Robbery of Penni Girard

3 24. On or about June 16, 1994, in the Northern District of California, the defendant

4 BRENDA MOORE

5 and others, knowingly and intentionally committed robbery of Penni Girard, in violation of

6 California Penal Code Sections 31, 211.

7 Racketeering Act Twelve

8 Robbery of Judith Meyer

9 25. On or about June 19, 1994, in the Northern District of California, the defendant

10 BRENDA MOORE

11 and others, knowingly and intentionally committed robbery of Judith Meyer, in violation of

12 California Penal Code Sections 31, 211.

13 Racketeering Act Thirteen

14 Conspiracy to Commit Robbery of Marshall's Department Store

15 26. From in or about and between May 1994 and July 1994, both dates being approximate and

16 inclusive, in the Northern District of California and elsewhere, the defendants

17 PAUL SCHNEIDER,
18 a/k/a "Cornfed," and
BRENDA MOORE,

19 and others, knowingly and intentionally conspired to commit robbery of the Marshall's

20 Department Store, Sacramento, California, and a co-conspirator committed an overt act in

21 furtherance of the conspiracy, in violation of California Penal Code Sections 31, 182, and 211.

22 Racketeering Act Fourteen

23 Conspiracy to Murder Junior Snyder

24 27. From in or about and between 1993 and August 2001, both dates being approximate and

25 inclusive, in the Northern District of California and elsewhere, the defendants

26 JOHN HARPER,
27 a/k/a "Turtle," and
ROBERT SHIELDS,
28 a/k/a "Bobby Ray,"

and others, knowingly and intentionally conspired to murder Junior Snyder, and a co-conspirator

1 committed an overt act in furtherance of the conspiracy, in violation of California Penal Code
2 Sections 31, 182, 184 and 187.

3 Racketeering Act Fifteen

4 Murder of Sonoma County Deputy Frank Trejo

5 28. On or about March 29, 1995, in the Northern District of California, the defendants

6 PAUL SCHNEIDER,
7 a/k/a "Cornfed," and
8 BRENDA MOORE

9 and others, unlawfully and with malice aforethought, did aid, abet, advise, encourage and
10 otherwise willfully participate in the murder of Frank Trejo, a police officer, in violation of
11 California Penal Code Sections 31 and 187.

12 Racketeering Act Sixteen

13 Conspiracy to Murder Gavin Shine

14 29. In or about July 1997, in the Northern District of California and elsewhere, the defendant

15 PAUL SCHNEIDER,
16 a/k/a "Cornfed,"

17 and others, knowingly and intentionally conspired to murder Gavin Shine, and a co-conspirator
18 committed an overt act in furtherance of the conspiracy, in violation of California Penal Code
19 Sections 31, 182, 184 and 187.

20 Racketeering Act Seventeen

21 Conspiracy to Murder Timothy Taylor

22 30. From in or about and between February 1999 and September 23, 1999, both dates being
23 approximate and inclusive, in the Northern and Central Districts of California and elsewhere, the
24 defendant

25 ROBERT SHIELDS,
26 a/k/a "Bobby Ray,"

27 and others, knowingly and intentionally conspired to murder Timothy Taylor, and a co-conspirator
28 committed an overt act in furtherance of the conspiracy, in violation of California Penal Code
Sections 31, 182, 184 and 187.

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1 Racketeering Act Eighteen

2 Solicitation to Murder Steven Williams, a/k/a "Wicked"

3 31. From in or about and between June 2000 and May, 2001, both dates being approximate
4 and inclusive, in the Northern District of California and elsewhere, the defendant

5 ROBERT SHIELDS,
6 a/k/a "Bobby Ray,"

7 with the intent that the crime be committed, knowingly and intentionally solicited another to
8 murder Steven Williams, a/k/a "Wicked," in violation of California Penal Code Sections 31, 653f,
9 and 187.

10 Racketeering Act Nineteen

11 The defendant named below committed the following acts, either one of which, alone,
12 constitutes the commission of Racketeering Act Nineteen:

13 a. Solicitation to Murder Steven Williams, a/k/a "Wicked"

14 32. From in or about and between July 2000 and August 2000, both dates being approximate
15 and inclusive, in the Northern District of California and elsewhere, the defendant

16 JOHN HARPER,
17 a/k/a "Turtle,"

18 with the intent that the crime be committed, knowingly and intentionally solicited another to
19 murder Steven Williams, a/k/a "Wicked," in violation of California Penal Code Sections 31, 653f,
20 and 187.

21 b. Attempted Murder of Stephen Williams, a/k/a "Wicked"

22 33. On August 11, 2000, in the Central District of California, the defendant

23 JOHN HARPER,
24 a/k/a "Turtle,"

25 and others, unlawfully and with malice aforethought, did aid, abet, advise, encourage and
26 otherwise willfully participate in the attempted murder of Steven Williams, a/k/a "Wicked," in
27 violation of California Penal Code Sections 31, 664, and 187.

28 Racketeering Act Twenty

Conspiracy to Distribute Narcotics

34. On or about June 27, 1994, in the Northern District of California and elsewhere, the

1 defendants

2 PAUL SCHNEIDER,
3 a/k/a "Cornfed," and
4 BRENDA MOORE,

5 and others, knowingly and intentionally conspired to distribute methamphetamine, a Schedule II
6 controlled substance, and marijuana, a Schedule II controlled substance, and a co-conspirator
7 committed an overt act in furtherance of the conspiracy, in violation of Title 21, United States
8 Code, Sections 846 and 841(a)(1) and Title 18, United States Code, Section 2.

8 Racketeering Act Twenty-One

9 The defendant named below committed the following acts, either one of which, alone,
10 constitutes the commission of Racketeering Act Twenty-One:

11 a. Conspiracy to Murder Raymond Stiles

12 35. In or about June 1990, in the Northern District of California, the defendant

13 PAUL SCHNEIDER,
14 a/k/a "Cornfed,"

15 and others, knowingly and intentionally conspired to murder Raymond Stiles, and a co-conspirator
16 committed an overt act in furtherance of the conspiracy, in violation of California Penal Code
17 Sections 31, 182, 184 and 187.

18 b. Attempted Murder of Raymond Stiles

19 36. In June, 1990, in the Northern District of California, the defendant

20 PAUL SCHNEIDER,
21 a/k/a "Cornfed,"

22 and another, knowingly and intentionally attempted to murder Raymond Stiles, in violation of
23 California Penal Code Sections 21a, 31, 664, and 187.

23 Racketeering Act Twenty-Two

24 The defendant named below committed the following acts, either one of which, alone,
25 constitutes the commission of Racketeering Act Twenty-Two:

26 a. Conspiracy to Murder William Pederson

27 37. From in or about and between January 2000 and August 31, 2000, both dates being
28 approximate and inclusive, in the Northern District of California and elsewhere, the defendant

1 JOHN HARPER,
2 a/k/a "Turtle,"

3 and others, knowingly and intentionally conspired to murder William Pederson, and a co-
4 conspirator committed an overt act in furtherance of the conspiracy, in violation of California
5 Penal Code Sections 31, 182, 184, and 187.

6 b. Attempt Murder of William Pederson

7 38. On August 31, 2000, in the Central District of California, the defendant

8 JOHN HARPER,
9 a/k/a "Turtle,"

10 and another, knowingly and intentionally attempted to murder William Pederson, in violation of
11 California Penal Code Sections 21a, 31, 664, and 187.

12 Racketeering Act Twenty-Three

13 Solicitation to Murder Jeremy Stewart

14 39. On or before February 21, 2001, in the Central District of California and elsewhere, the
15 defendant

16 MARK GLASS,
17 a/k/a "Buzzard,"

18 with the intent that the crime be committed, knowingly and intentionally solicited another to
19 murder Jeremy Stewart, in violation of California Penal Code Sections 31, 653f, and 187.

20 Racketeering Act Twenty-Four

21 Conspiracy to Murder Michael Crandall

22 40. From in or about and between October 2000, and August 2001, both dates being
23 approximate and inclusive, in the Northern District of California and elsewhere, the defendant

24 JOHN HARPER,
25 a/k/a "Turtle,"

26 and others knowingly and intentionally conspired to murder Michael Crandall, and a co-
27 conspirator committed an overt act in furtherance of the conspiracy, in violation of California
28 Penal Code Sections 31, 182, 184 and 187.

Racketeering Act Twenty-Five

The defendant named below committed the following acts, either one of which, alone,

1 constitutes the commission of Racketeering Act Twenty-Five:

2 a. Solicitation to Murder Brian Kershaw

3 41. From in or about and between 1999 and August, 2001, both dates being approximate and
4 inclusive, in the Northern District of California and elsewhere, the defendant

5 ROBERT SHIELDS,
6 a/k/a "Bobby Ray,"

7 with the intent that the crime be committed, knowingly and intentionally solicited another to
8 murder Brian Kershaw, in violation of California Penal Code Sections 31, 653f, and 187.

9 b. Solicitation to Murder Brian Kershaw

10 42. From in or about and between 2000 and August, 2001, both dates being approximate and
11 inclusive, in the Northern District of California and elsewhere, the defendant

12 MARK GLASS,
13 a/k/a "Buzzard,"

14 with the intent that the crime be committed, knowingly and intentionally solicited another to
15 murder Brian Kershaw, in violation of California Penal Code Sections 31, 653f, and 187.

16 Racketeering Act Twenty-Six

17 Conspiracy to Distribute Narcotics

18 43. From in or about and between December 1999 and May 2000, both dates being
19 approximate and inclusive, in the Northern District of California and elsewhere, the defendants

20 JAMES PENDLETON,
21 a/k/a "J.P.," and
22 JOHN HARPER,
23 a/k/a "Turtle,"

24 and others, knowingly and intentionally conspired to distribute narcotics, and a co-conspirator
25 committed an overt act in furtherance of the conspiracy, in violation of Title 21, United States
26 Code, Section 846, and Title 18, United States Code, Section 2.

27 Racketeering Act Twenty-Seven

28 Conspiracy to Murder Timothy Armerding

44. From in or about and between May 9, 2000 and August 2001, both dates being
approximate and inclusive, in the Northern District of California and elsewhere, the defendant

1 JAMES PENDLETON,
2 a/k/a "J.P.,"

3 and others, knowingly and intentionally conspired to murder Timothy Armerding, and a co-
4 conspirator committed an overt act in furtherance of the conspiracy, in violation of California
5 Penal Code Sections 31, 182, 184 and 187.

6 Racketeering Act Twenty-Eight

7 Conspiracy to Murder Jack Leo and Jason Gere

8 45. From in or about and between January 29, 1999 and January 23, 2000, both dates being
9 approximate and inclusive, in the Northern District of California and elsewhere, the defendant

10 ROBERT SHIELDS,
11 a/k/a "Bobby Ray,"

12 and others, knowingly and intentionally conspired to murder Jack Leo and Jason Gere, and a co-
13 conspirator committed an overt act in furtherance of the conspiracy, in violation of California
14 Penal Code Sections 31, 182, 184 and 187.

15 Racketeering Act Twenty-Nine

16 Conspiracy to Murder Johnny Bright

17 46. From in or about and between January 2000 and August 2001, both dates being
18 approximate and inclusive, in the Northern District of California and elsewhere, the defendants

19 ROBERT SHIELDS,
20 a/k/a "Bobby Ray," and
21 JOHN HARPER,
22 a/k/a "Turtle,"

23 and others, knowingly and intentionally conspired to murder Johnny Bright, and a co-conspirator
24 committed an overt act in furtherance of the conspiracy, in violation of California Penal Code
25 Sections 31, 182, 184 and 187.

26 Racketeering Act Thirty

27 Conspiracy to Distribute Narcotics

28 47. From in or about and between February 1999 to August 2001, both dates being
approximate and inclusive, in the Northern District of California and elsewhere, the defendant

ROBERT SHIELDS,
a/k/a "Bobby Ray,"

1 and others, knowingly and intentionally conspired to distribute methamphetamine and heroin,
2 Schedule II controlled substances, and a co-conspirator committed an overt act in furtherance of
3 the conspiracy, in violation of Title 21, United States Code, Sections 846 and 841(a)(1) and Title
4 18, United States Code, Section 2.

5 Racketeering Act Thirty-One

6 Solicitation to Murder David Aguilar

7 48. From in or about and between January 2000 and August 2001, both dates being
8 approximate and inclusive, in the Central District of California and elsewhere, the defendant

9 ROBERT SHIELDS,
a/k/a "Bobby Ray,"

10 with the intent that the crime be committed, knowingly and intentionally solicited another to
11 murder David Aguilar, in violation of California Penal Code Sections 31, 653f, and 187.

12 Racketeering Act Thirty-Two

13 Conspiracy to Murder Robert Scully

14 49. From in or about and between September 2000 and August 2001, both dates being
15 approximate and inclusive, in the Northern District of California and elsewhere, the defendants

16 JAMES PENDLETON,
17 PAUL SCHNEIDER,
a/k/a "Cornfed," and
18 JOHN HARPER,
a/k/a "Turtle,"

19 and others, knowingly and intentionally conspired to murder Robert Scully, and a co-conspirator
20 committed an overt act in furtherance of the conspiracy, in violation of California Penal Code
21 Sections 31, 182, 184 and 187.

22 Racketeering Act Thirty-Three

23 Solicitation to Murder Arthur Carasis

24 50. From in or about and between September 2000 and January 15, 2001, both dates being
25 approximate and inclusive, in the Northern District of California, the defendant

26 JAMES PENDLETON,
27 a/k/a "J.P.,"

28 with the intent that the crime be committed, knowingly and intentionally solicited another to

1 murder Arthur Carasis, in violation of California Penal Code Sections 31, 653f, and 187.

2 Racketeering Act Thirty-Four

3 Solicitation to Murder Gang Members

4 51. From in or about and between September 18, 2000 and August 2001, both dates being
5 approximate and inclusive, in the Northern District of California and elsewhere, the defendant

6 MARK GLASS,
7 a/k/a "Buzzard,"

8 with the intent that the crime be committed, knowingly and intentionally solicited another to
9 murder gang members, in violation of California Penal Code Sections 31, 653f, and 187.

10 Racketeering Act Thirty-Five

11 Conspiracy to Distribute Narcotics

12 52. From in or about and between June 1999 and July 1999, both dates being approximate
13 and inclusive, in the Northern District of California and elsewhere,
14 the defendant

15 JAMES PENDLETON,
16 a/k/a "J.P.,"

17 and others, knowingly and intentionally conspired to distribute methamphetamine, a Schedule II
18 controlled substance, and marijuana, a Schedule II controlled substance, and a co-conspirator
19 committed an overt act in furtherance of the conspiracy, in violation of Title 21, United States
20 Code, Sections 846 and 841(a)(1) and Title 18, United States Code, Section 2.

21 COUNT THREE: [18 U.S.C. §§1959(a)(5), 2]

22 53. Paragraphs one through eight of this Indictment are hereby realleged and incorporated as
23 if fully set forth herein.

24 54. From in or about and between 1992 and December 1993, both dates being approximate
25 and inclusive, in the Northern District of California and elsewhere, the defendant

26 REUBEN PAPPAN,
27 a/k/a "Butch,"

28 and others, for the purpose of gaining entrance to, and maintaining and increasing their positions
in, the Aryan Brotherhood, an enterprise engaged in racketeering activity, knowingly and

1 intentionally conspired to murder Chris McDowell, who was incarcerated in Tehachapi State
2 Prison, Tehachapi, California, and a co-conspirator committed an overt act in furtherance of the
3 conspiracy, in violation of California Penal Code Sections 187 (Unlawful killing of a Human
4 Being with Malice Aforethought–Murder), 182 and 184 (Conspiracy to Commit Murder) and 31.

5 All in violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

6

7 COUNT FOUR: [18 U.S.C. §§1959(a)(5), 2]

8 55. Paragraphs one through eight of this Indictment are hereby realleged and incorporated as
9 if fully set forth herein.

10 56. In or about July, 1997, in the Northern District of California and elsewhere, the defendant

11 PAUL SCHNEIDER,
12 a/k/a “Cornfed,”

13 and others, for the purpose of gaining entrance to, and maintaining and increasing their positions
14 in, the Aryan Brotherhood, an enterprise engaged in racketeering activity, knowingly and
15 intentionally conspired to murder Gavin Shine, and a co-conspirator committed an overt act in
16 furtherance of the conspiracy, in violation of California Penal Code Sections 187 (Unlawful
17 Killing of a Human Being with Malice Aforethought–Murder), 182 and 184 (Conspiracy to
18 Commit Murder) and 31.

19 All in violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

20

21 COUNT FIVE: [18 U.S.C. §§1959(a)(5), 2]

22 57. Paragraphs one through eight of this Indictment are hereby realleged and incorporated as
23 if fully set forth herein.

24 58. On or about August 11, 2000, in the Central District of California, the defendant

25 JOHN HARPER,
26 a/k/a “Turtle,”

27 for the purpose of gaining entrance to, and maintaining and increasing his position in, the Aryan
28 Brotherhood, an enterprise engaged in racketeering activity, knowingly and intentionally
attempted to murder Steven Williams, a/k/a “Wicked,” in violation of California Penal Code

1 Sections 187 (Unlawful Killing of a Human Being with Malice Aforethought–Murder), 182 and
2 184 (Conspiracy to Commit Murder) and 31.

3 All in violation of Title 18, United States Code, Sections 1959(a)(5) and 2.
4

5 COUNT SIX: [18 U.S.C. §§1959(a)(5), 2]

6 59. Paragraphs one through eight of this Indictment are hereby realleged and incorporated as
7 if fully set forth herein.

8 60. In or about December 2000, in the Central District of California, the defendant

9 MARK GLASS,
a/k/a "Buzzard,"

10 for the purpose of gaining entrance to, and maintaining and increasing his position in, the Aryan
11 Brotherhood, an enterprise engaged in racketeering activity, knowingly and intentionally
12 attempted to murder Jeremy Stewart, in violation of California Penal Code Sections 187
13 (Unlawful Killing of a Human Being with Malice Aforethought–Murder), 182 and 184
14 (Conspiracy to Commit Murder) and 31.

15 All in violation of Title 18, United States Code, Sections 1959(a)(5) and 2.
16


17 DATED:

A TRUE BILL.

18
19
20 FOREPERSON
21

22 ROBERT S. MUELLER, III
23 United States Attorney

24 
25 DAVID W. SHAPIRO
26 Chief, Criminal Division

27
28 (Approved as to form: )
AUSA Canepa

INDICTMENT