

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

INDICTMENT

- against -

Cr. No.  
(18 U.S.C. §§

DENNIS KATONA, also known as "Rooster,"  
WILLIAM GRAYSON, also known as "Tung Foo,"  
RICHARD MAHAFFEY, also known as "Fat Cat,"  
MAURICE BARNES, also known as "Venger,"  
ANTHONY BELLOCCHIO, also known as "Sandy,"  
JOSEPH BELLOCCHIO, also known as "Kinky Joe,"  
STUART BERMAN, also known as "Stinky,"  
WALTER BITONTI,  
PAUL BLUME,  
CARL BROWN, also known as "Simon" and "Dirt,"  
JOSEPH BRYANT, also known as "Hammer" and "Grumpy,"  
RICHARD BURKHARDT, also known as "Woodchopper,"  
ROBERT CHILLINSKY,  
EDMUND COLE, also known as "Rottweiler,"  
JOHN COOPER, also known as "Coop,"  
CHARLES CSRENKO, also known as "Hard Way,"  
WILLIAM DAILEY, also known as "Arlo,"  
TIMOTHY DALTON, also known as "Names" and "Intention,"  
JOSEPH DEMATTEO, also known as "Coney Island Joe,"  
DOMINICK DIPIETRO, also known as "Tac,"  
FREDERICK DUNLAP,  
CARLE EASTBURN, also known as "Pig,"  
MICHAEL ELLIOT, also known as "Blackbeard" and "Choco,"  
BRUCE ENGLAND, also known as "Oscar,"  
TIMOTHY FLOOD, also known as "Casual,"  
RINALDO FOCA, also known as "Jason Juarbe" and "Spanish Ray,"  
ROBERT FRANCIS, also known as "Big Bobby" and "Big Bob,"  
CRAIG FREDERICK, also known as "Butch," "Aqualung" and "Old Fart,"  
GIRARD GENEVIE,  
JESSE GRAYSON, also known as "L.J.,"  
RANDALL GROFF, also known as "R.G.,"  
DAVID GUTHRIE, also known as "Arlo,"  
JOHN HANE, also known as "Double H.,"

844(h)(2),  
924(c)(1)(A)(iii),  
1959(a)(3),  
1959(a)(6), 2  
and 3551 et seq.)

JOHN HAPCIC, also known as "Hawk,"  
TED HASSEY, also known as "Bar Keep,"  
JAMES HAWKS, also known as "Buzzard,"  
ANTHONY HAYWOOD, also known as "Dozer,"  
MICHAEL HRABEL, also known as "Mick,"  
ROBERT HRIFKO, also known as "Logic,"  
PHILLIP HUFF,  
RONNIE JAMES, also known as "Hooch,"  
STEPHEN JOHNSTON, also known as "Rambunxious,"  
JOHN JONES, also known as "Hose-A,"  
STEPHEN JURNAK, also known as "Steve-O,"  
VICTOR KEEHN,  
BRIAN KERUSKIN, also known as "Dudes,"  
HENRY KLINGER, also known as "Hammer,"  
MICHAEL LANGER, also known as "Red Hand,"  
JEFFREY LIGHT, also known as "Flash,"  
THOMAS LOFINK, also known as "Tomkat,"  
WILLIAM LOVE, also known as "Billy" and "Stone,"  
LARRY MABRY, also known as "Harley,"  
THOMAS MAISEY, also known as "Drifter,"  
FRED MCCLURE, also known as "Mouth,"  
ANDREW MELLON,  
JAMES NAMISH, also known as "Crazy,"  
CHARLES NICHOLS, also known as "Tombstone,"  
EDWARD NOLAN, also known as "Roll-Aid,"  
JOHN OREM, also known as "Night School,"  
DAVID PAUSWINSKI,  
HARRY QUINTER,  
ROBERT QUINTER, also known as "Standup,"  
RICKY RADER, also known as "Radar,"  
GILBERT RAMIREZ, also known as "Gibby" and "Pedro,"  
CARLOS RODRIGUEZ, also known as "Jake,"  
DENNIS ROHRBACH, also known as "Short Circuit,"  
RICK RUHLMAN,  
WARREN SCHALLER, also known as "Bake,"  
PAUL STEINER, also known as "Baron" and "Bear-Run,"  
BRUCE THOMAS, also known as "Fineline" and "Tattoo Bruce,"  
PAUL TOLLEY, also known as "Tap,"  
CHARLES TORRENTS, also known as "Igor," and  
DWAYNE WITFIELD, also known as "Doc,"

Defendants.

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## THE GRAND JURY CHARGES:

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

### Introduction

1. Outlaw motorcycle clubs were national criminal organizations comprised of local chapters. Membership was open only to men. The largest outlaw clubs included the Hells Angels and the Pagans.

2. The Hells Angels were the oldest and largest outlaw motorcycle club in the world and maintained chapters throughout the world. Within the United States, the Hells Angels maintained chapters in approximately 11 states. In New York State, the Hells Angels maintained four chapters, including a relatively small chapter in Long Island. That chapter was located at 162 Henry Street in Hempstead.

3. The Long Island chapter of the Hells Angels was associated with other Long Island outlaw clubs, including the Wicked Wheelers of Island Park, the Demon Knights of Ronkonkoma and the East Legion of Mastic. These clubs were subservient to the Hells Angels and were known as “duck clubs.”

### The Pagans

4. The Pagans originated in Prince George's County, Maryland, in 1959. As the Pagans expanded, they formed a national governing board, or “Mother Club,” that consisted of the Pagans’ founding 13 members. The Pagans maintained chapters in several states, including New York, New Jersey, Delaware, Maryland, Ohio, Pennsylvania, Virginia and West Virginia. In New York State, the Pagans maintained several chapters in Long Island until in or about 1999, when most members of the Long Island chapters were convicted of federal criminal charges.

5. The Mother Club did not have a geographically fixed location. It consisted of a national president, a national vice president, a national sergeant-at-arms

-- the defendant DENNIS KATONA, also known as "Rooster" -- a national treasurer and others such as the defendants WILLIAM GRAYSON, also known as "Tung Foo," and RICHARD MAHAFFEY, also known as "Fat Cat." The Mother Club was responsible for setting policies, enforcing rules and regulations and scheduling events such as parties, funerals, motorcycle trips known as "runs" and "shows of force" against rival outlaw motorcycle clubs, particularly the Hells Angels.

6. The hierarchy of the Pagans' local chapters was very similar to that of the Mother Club in that each local chapter consisted of a president (also known as a "diamond") -- who was selected by a Mother Club member -- a vice president, a sergeant-at-arms and a treasurer. Moreover, each local chapter was assigned a Mother Club advisor who monitored the activities of that chapter.

7. The Pagans Mother Club appointed a group of long-term members of the Pagans to be "regulators." The regulators' responsibilities included enforcing discipline in the local chapters and helping the local chapters conceal their criminal activity from law enforcement.

8. Each member of the Pagans signified his membership by wearing a sleeveless jacket known as "colors." A member's colors contained a variety of patches bearing the word "Pagans" and insignia such as "GFPD," which is short for "God Forgives, Pagans Don't," and a patch bearing the symbol "1%." Motorcycle clubs such as the Pagans and the Hells Angels were "1%" clubs, or "1%er's," which signified that each member was one "of a hundred of us who has given up on society" and which warned the public to "stay out of our face."

9. To signify his special status, each member of the Pagans Mother Club had on the back of his colors a black patch with the number 13, which corresponded to the number of the Pagans' founding members. Each regulator had an

arm tattoo and/or a patch on his colors consisting of a diamond containing a smoking gun. Nearly every member had his arms emblazoned with tattoos to reflect his membership and rank.

10. As defined in Section 1959(b)(2) of Title 18 of the United States Code, the Pagans constituted an "enterprise," that is, a group of individuals associated in fact. The Pagans engaged in, and their activities affected, interstate commerce. The Pagans constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

11. As defined in Sections 1959(b)(1) and 1961(1) of Title 18 of the United States Code, the Pagans enterprise, through its members and associates, engaged in "racketeering activity," that is, acts and threats involving arson, extortion and dealing in controlled substances, which acts and threats were in violation of the laws of the United States and the State of New York.

12. The Pagans sought to accomplish their objectives through, among other means, creating a climate of fear by entering business establishments in "a show of force," by destroying property, and by assaulting members of rival motorcycle clubs, particularly the Hells Angels and their duck clubs.

COUNT ONE  
(Conspiracy to Commit Assault)

13. Paragraphs 1 through 12 are realleged and incorporated as if set forth fully herein.

14. On or about and between February 22, 2002, and February 23, 2002, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, for the purpose of gaining entrance to and maintaining and increasing position in the Pagans, an enterprise engaged in racketeering activity, the defendants DENNIS KATONA, also known as "Rooster," WILLIAM GRAYSON, also

known as "Tung Foo," RICHARD MAHAFFEY, also known as "Fat Cat," MAURICE BARNES, also known as "Venger," ANTHONY BELLOCCHIO, also known as "Sandy," JOSEPH BELLOCCHIO, also known as "Kinky Joe," STUART BERMAN, also known as "Stinky," WALTER BITONTI, PAUL BLUME, CARL BROWN, also known as "Simon" and "Dirt," JOSEPH BRYANT, also known as "Hammer" and "Grumpy," RICHARD BURKHARDT, also known as "Woodchopper," ROBERT CHILLINSKY, EDMUND COLE, also known as "Rottweiler," JOHN COOPER, also known as "Coop," CHARLES CSRENKO, also known as "Hard Way," WILLIAM DAILEY, also known as "Arlo," TIMOTHY DALTON, also known as "Names" and "Intention," JOSEPH DEMATTEO, also known as "Coney Island Joe," DOMINICK DIPIETRO, also known as "Tac," FREDERICK DUNLAP, CARLE EASTBURN, also known as "Pig," MICHAEL ELLIOT, also known as "Blackbeard" and "Choco," BRUCE ENGLAND, also known as "Oscar," TIMOTHY FLOOD, also known as "Casual," RINALDO FOCA, also known as "Jason Juarbe" and "Spanish Ray," ROBERT FRANCIS, also known as "Big Bobby" and "Big Bob," CRAIG FREDERICK, also known as "Butch," "Aqualung" and "Old Fart," GIRARD GENEVIE, JESSE GRAYSON, also known as "L.J.," RANDALL GROFF, also known as "R.G.," DAVID GUTHRIE, also known as "Arlo," JOHN HANE, also known as "Double H.," JOHN HAPCIC, also known as "Hawk," TED HASSEY, also known as "Bar Keep," JAMES HAWKS, also known as "Buzzard," ANTHONY HAYWOOD, also known as "Dozer," MICHAEL HRABEL, also known as "Mick," ROBERT HRIFKO, also known as "Logic," PHILLIP HUFF, RONNIE JAMES, also known as "Hooch," STEPHEN JOHNSTON, also known as "Rambunxious," JOHN JONES, also known as "Hose-A," STEPHEN JURNAK, also known as "Steve-O," VICTOR KEEHN, BRIAN KERUSKIN, also known as "Dudes," HENRY KLINGER, also known as "Hammer," MICHAEL LANGER, also known as "Red Hand," JEFFREY LIGHT,

also known as "Flash," THOMAS LOFINK, also known as "Tomkat," WILLIAM LOVE, also known as "Billy" and "Stone," LARRY MABRY, also known as "Harley," THOMAS MAISEY, also known as "Drifter," FRED MCCLURE, also known as "Mouth," ANDREW MELLON, JAMES NAMISH, also known as "Crazy," CHARLES NICHOLS, also known as "Tombstone," EDWARD NOLAN, also known as "Roll-Aid," JOHN OREM, also known as "Night School," DAVID PAUSWINSKI, HARRY QUINTER, ROBERT QUINTER, also known as "Standup," RICKY RADER, also known as "Radar," GILBERT RAMIREZ, also known as "Gibby" and "Pedro," CARLOS RODRIGUEZ, also known as "Jake," DENNIS ROHRBACH, also known as "Short Circuit," RICK RUHLMAN, WARREN SCHALLER, also known as "Bake," PAUL STEINER, also known as "Baron" and "Bear-Run," BRUCE THOMAS, also known as "Fineline" and "Tattoo Bruce," PAUL TOLLEY, also known as "Tap," CHARLES TORRENTS, also known as "Igor," and DWAYNE WITFIELD, also known as "Doc," together with others, knowingly and intentionally conspired to assault members of the Hells Angels, Demon Knights, East Legion and Wicked Wheelers with dangerous weapons, to wit: firearms such as shotguns and handguns; stun guns; switchblade knives, gravity knives, daggers and other knives and edged weapons such as double-bladed axes; metal knuckles; chains; and clubs such as bats, axe handles, night sticks and slappers, and to commit assault  
r e s u l t i n g                    i n                    s e r i o u s                    b o d i l y

injury, in violation of New York Penal Law Sections 120.05.1, 120.05.2, 120.05.4 and 120.05.6.

(Title 18, United States Code, Sections 1959(a)(6) and 3551 et seq.)

COUNT TWO  
(Assault at the Vanderbilt)

15. Paragraphs 1 through 12 are realleged and incorporated as if set forth fully herein.

16. On or about February 23, 2002, within the Eastern District of New York and elsewhere, for the purpose of gaining entrance to and maintaining and increasing position in the Pagans, an enterprise engaged in racketeering activity, the defendants DENNIS KATONA, also known as "Rooster," WILLIAM GRAYSON, also known as "Tung Foo," RICHARD MAHAFFEY, also known as "Fat Cat," MAURICE BARNES, also known as "Venger," ANTHONY BELLOCCHIO, also known as "Sandy," JOSEPH BELLOCCHIO, also known as "Kinky Joe," STUART BERMAN, also known as "Stinky," WALTER BITONTI, PAUL BLUME, CARL BROWN, also known as "Simon" and "Dirt," JOSEPH BRYANT, also known as "Hammer" and "Grumpy," RICHARD BURKHARDT, also known as "Woodchopper," ROBERT CHILLINSKY, EDMUND COLE, also known as "Rottweiler," JOHN COOPER, also known as "Coop," CHARLES CSRENKO, also known as "Hard Way," WILLIAM DAILEY, also known as "Arlo," TIMOTHY DALTON, also known as "Names" and "Intention," JOSEPH DEMATTEO, also known as "Coney Island Joe," DOMINICK DIPIETRO, also known as "Tac," FREDERICK DUNLAP, CARLE EASTBURN, also known as "Pig," MICHAEL ELLIOT, also known as "Blackbeard" and "Choco," BRUCE ENGLAND, also known as "Oscar," TIMOTHY FLOOD, also known as "Casual," RINALDO FOCA, also known as "Jason Juarbe" and "Spanish Ray," ROBERT FRANCIS, also known as "Big Bobby" and "Big

Bob," CRAIG FREDERICK, also known as "Butch," "Aqualung" and "Old Fart," GIRARD GENEVIE, JESSE GRAYSON, also known as "L.J.," RANDALL GROFF, also known as "R.G.," DAVID GUTHRIE, also known as "Arlo," JOHN HANE, also known as "Double H.," JOHN HAPCIC, also known as "Hawk," TED HASSEY, also known as "Bar Keep," JAMES HAWKS, also known as "Buzzard," ANTHONY HAYWOOD, also known as "Dozer," MICHAEL HRABEL, also known as "Mick," ROBERT HRIFKO, also known as "Logic," PHILLIP HUFF, RONNIE JAMES, also known as "Hooch," STEPHEN JOHNSTON, also known as "Rambunxious," JOHN JONES, also known as "Hose-A," STEPHEN JURNAK, also known as "Steve-O," VICTOR KEEHN, BRIAN KERUSKIN, also known as "Dudes," HENRY KLINGER, also known as "Hammer," MICHAEL LANGER, also known as "Red Hand," JEFFREY LIGHT, also known as "Flash," THOMAS LOFINK, also known as "Tomkat," WILLIAM LOVE, also known as "Billy" and "Stone," LARRY MABRY, also known as "Harley," THOMAS MAISEY, also known as "Drifter," FRED MCCLURE, also known as "Mouth," ANDREW MELLON, JAMES NAMISH, also known as "Crazy," CHARLES NICHOLS, also known as "Tombstone," EDWARD NOLAN, also known as "Roll-Aid," JOHN OREM, also known as "Night School," DAVID PAUSWINSKI, HARRY QUINTER, ROBERT QUINTER, also known as "Standup," RICKY RADER, also known as "Radar," GILBERT RAMIREZ, also known as "Gibby" and "Pedro," CARLOS RODRIGUEZ, also known as "Jake," DENNIS ROHRBACH, also known as "Short Circuit," RICK RUHLMAN, WARREN SCHALLER, also known as "Bake," PAUL STEINER, also known as "Baron" and "Bear-Run," BRUCE THOMAS, also known as "Fineline" and "Tattoo Bruce," PAUL TOLLEY, also known as "Tap," CHARLES TORRENTS, also known as "Igor," and DWAYNE WITFIELD, also known as "Doc," knowingly and intentionally assaulted members of the Hells Angels, Demon Knights, East Legion and Wicked Wheelers with dangerous

weapons, to wit: firearms such as shotguns and handguns; stun guns; switchblade knives, gravity knives, daggers and other knives and edged weapons such as double-bladed axes; metal knuckles; chains; and clubs such as bats, axe handles, night sticks and slappers, and committed assault resulting in serious bodily injury, in violation of New York Penal Law Sections 120.05.1, 120.05.2, 120.05.4 and 120.05.6.

(Title 18, United States Code, Sections 1959(a)(3), 2 and 3551 et seq.)

COUNT THREE  
(Using and Carrying Firearms)

17. On or about and between February 22, 2002, and February 23, 2002, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants DENNIS KATONA, also known as "Rooster," WILLIAM GRAYSON, also known as "Tung Foo," RICHARD MAHAFFEY, also known as "Fat Cat," MAURICE BARNES, also known as "Venger," ANTHONY BELLOCCHIO, also known as "Sandy," JOSEPH BELLOCCHIO, also known as "Kinky Joe," STUART BERMAN, also known as "Stinky," WALTER BITONTI, PAUL BLUME, CARL BROWN, also known as "Simon" and "Dirt," JOSEPH BRYANT, also known as "Hammer" and "Grumpy," RICHARD BURKHARDT, also known as "Woodchopper," ROBERT CHILLINSKY, EDMUND COLE, also known as "Rottweiler," JOHN COOPER, also known as "Coop," CHARLES CSRENKO, also known as "Hard Way," WILLIAM DAILEY, also known as "Arlo," TIMOTHY DALTON, also known as "Names" and "Intention," JOSEPH DEMATTEO, also known as "Coney Island Joe," DOMINICK DIPIETRO, also known as "Tac," FREDERICK DUNLAP, CARLE EASTBURN, also known as "Pig," MICHAEL ELLIOT, also known as "Blackbeard" and "Choco," BRUCE ENGLAND, also known as "Oscar," TIMOTHY FLOOD, also known as "Casual," RINALDO FOCA, also known as "Jason Juarbe" and "Spanish Ray," ROBERT

FRANCIS, also known as "Big Bobby" and "Big Bob," CRAIG FREDERICK, also known as "Butch," "Aqualung" and "Old Fart," GIRARD GENEVIE, JESSE GRAYSON, also known as "L.J.," RANDALL GROFF, also known as "R.G.," DAVID GUTHRIE, also known as "Arlo," JOHN HANE, also known as "Double H.," JOHN HAPCIC, also known as "Hawk," TED HASSEY, also known as "Bar Keep," JAMES HAWKS, also known as "Buzzard," ANTHONY HAYWOOD, also known as "Dozer," MICHAEL HRABEL, also known as "Mick," ROBERT HRIFKO, also known as "Logic," PHILLIP HUFF, RONNIE JAMES, also known as "Hooch," STEPHEN JOHNSTON, also known as "Rambunxious," JOHN JONES, also known as "Hose-A," STEPHEN JURNAK, also known as "Steve-O," VICTOR KEEHN, BRIAN KERUSKIN, also known as "Dudes," HENRY KLINGER, also known as "Hammer," MICHAEL LANGER, also known as "Red Hand," JEFFREY LIGHT, also known as "Flash," THOMAS LOFINK, also known as "Tomkat," WILLIAM LOVE, also known as "Billy" and "Stone," LARRY MABRY, also known as "Harley," THOMAS MAISEY, also known as "Drifter," FRED MCCLURE, also known as "Mouth," ANDREW MELLON, JAMES NAMISH, also known as "Crazy," CHARLES NICHOLS, also known as "Tombstone," EDWARD NOLAN, also known as "Roll-Aid," JOHN OREM, also known as "Night School," DAVID PAUSWINSKI, HARRY QUINTER, ROBERT QUINTER, also known as "Standup," RICKY RADER, also known as "Radar," GILBERT RAMIREZ, also known as "Gibby" and "Pedro," CARLOS RODRIGUEZ, also known as "Jake," DENNIS ROHRBACH, also known as "Short Circuit," RICK RUHLMAN, WARREN SCHALLER, also known as "Bake," PAUL STEINER, also known as "Baron" and "Bear-Run," BRUCE THOMAS, also known as "Fineline" and "Tattoo Bruce," PAUL TOLLEY, also known as "Tap," CHARLES TORRENTS, also known as "Igor," and DWAYNE WITFIELD, also known as "Doc," during and in relation to the crimes of violence charged in Counts One and Two of this

Indictment, knowingly and intentionally used and carried firearms, to wit: handguns and shotguns, and, in furtherance of such crimes, knowingly and intentionally possessed said firearms, which firearms were discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(iii), 2 and 3551 et seq.)

COUNT FOUR  
(Carrying Explosives)

18. On or about and between February 22, 2002, and February 23, 2002, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants DENNIS KATONA, also known as "Rooster," WILLIAM GRAYSON, also known as "Tung Foo," RICHARD MAHAFFEY, also known as "Fat Cat," MAURICE BARNES, also known as "Venger," ANTHONY BELLOCCHIO, also known as "Sandy," JOSEPH BELLOCCHIO, also known as "Kinky Joe," STUART BERMAN, also known as "Stinky," WALTER BITONTI, PAUL BLUME, CARL BROWN, also known as "Simon" and "Dirt," JOSEPH BRYANT, also known as "Hammer" and "Grumpy," RICHARD BURKHARDT, also known as "Woodchopper," ROBERT CHILLINSKY, EDMUND COLE, also known as "Rottweiler," JOHN COOPER, also known as "Coop," CHARLES CSRENKO, also known as "Hard Way," WILLIAM DAILEY, also known as "Arlo," TIMOTHY DALTON, also known as "Names" and "Intention," JOSEPH DEMATTEO, also known as "Coney Island Joe," DOMINICK DIPIETRO, also known as "Tac," FREDERICK DUNLAP, CARLE EASTBURN, also known as "Pig," MICHAEL ELLIOT, also known as "Blackbeard" and "Choco," BRUCE ENGLAND, also known as "Oscar," TIMOTHY FLOOD, also known as "Casual," RINALDO FOCA, also known as "Jason Juarbe" and "Spanish Ray," ROBERT FRANCIS, also known as "Big Bobby" and "Big Bob," CRAIG FREDERICK, also known

as "Butch," "Aqualung" and "Old Fart," GIRARD GENEVIE, JESSE GRAYSON, also known as "L.J.," RANDALL GROFF, also known as "R.G.," DAVID GUTHRIE, also known as "Arlo," JOHN HANE, also known as "Double H.," JOHN HAPCIC, also known as "Hawk," TED HASSEY, also known as "Bar Keep," JAMES HAWKS, also known as "Buzzard," ANTHONY HAYWOOD, also known as "Dozer," MICHAEL HRABEL, also known as "Mick," ROBERT HRIFKO, also known as "Logic," PHILLIP HUFF, RONNIE JAMES, also known as "Hooch," STEPHEN JOHNSTON, also known as "Rambunxious," JOHN JONES, also known as "Hose-A," STEPHEN JURNAK, also known as "Steve-O," VICTOR KEEHN, BRIAN KERUSKIN, also known as "Dudes," HENRY KLINGER, also known as "Hammer," MICHAEL LANGER, also known as "Red Hand," JEFFREY LIGHT, also known as "Flash," THOMAS LOFINK, also known as "Tomkat," WILLIAM LOVE, also known as "Billy" and "Stone," LARRY MABRY, also known as "Harley," THOMAS MAISEY, also known as "Drifter," FRED MCCLURE, also known as "Mouth," ANDREW MELLON, JAMES NAMISH, also known as "Crazy," CHARLES NICHOLS, also known as "Tombstone," EDWARD NOLAN, also known as "Roll-Aid," JOHN OREM, also known as "Night School," DAVID PAUSWINSKI, HARRY QUINTER, ROBERT QUINTER, also known as "Standup," RICKY RADER, also known as "Radar," GILBERT RAMIREZ, also known as "Gibby" and "Pedro," CARLOS RODRIGUEZ, also known as "Jake," DENNIS ROHRBACH, also known as "Short Circuit," RICK RUHLMAN, WARREN SCHALLER, also known as "Bake," PAUL STEINER, also known as "Baron" and "Bear-Run," BRUCE THOMAS, also known as "Fineline" and "Tattoo Bruce," PAUL TOLLEY, also known as "Tap," CHARLES TORRENTS, also known as "Igor," and DWAYNE WITFIELD, also known as "Doc," during the commission of felonies, to wit: the crimes charged in Counts One and Two of

this Indictment, knowingly and intentionally carried explosives, to wit: small arms ammunition.

(Title 18, United States Code, Sections 844(h)(2), 2 and 3551 et seq.)

A TRUE BILL

FOREPERSON

ALAN VINEGRAD  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK