FILED03 FEB '16 12:18USDC-ORP

UNDER SEAL

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA **3:16-CR-00051-AA**

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 PFEIFER ANDERSON, and
KENNETH MEDENBACH,

Defendants.

INDICTMENT

18 U.S.C. § 372

UNDER SEAL

THE GRAND JURY CHARGES:

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

On or about October 5, 2015, and continuing through the date of this indictment, 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 PFEIFER ANDERSON, and **KENNETH MEDENBACH**, 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, an agency within the Department of the Interior, from discharging the duties of their office at the Malheur National Wildlife Refuge, 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 October 5, 2015, two conspirators traveled to Harney County, Oregon, to warn the Harney County sheriff of "extreme civil unrest" if certain demands were not met.

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

c. 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.

d. 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.

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

f. 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.

g. 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.

Dated this 3 day of February 2016.

A TRUE BILL.

OFFICIATING FOREPERSON

Presented by:

BILLY J. WILLIAMS
United States Attorney

ETHAN D. KNIGHT
GEOFFREY A. BARROW
Assistant United States Attorneys