

STATE OF MISSOURI)
) ss.
COUNTY OF JACKSON)

A F F I D A V I T

I, Stephen L. Cook, being duly sworn state the following:

1. I am a detective with the Independence, Missouri Police Department (IPD) and have been so employed as a police officer for sixteen years. I am currently assigned as a detective in the Criminal Investigations Bureau of the IPD. I am an internationally recognized expert in the area of Outlaw Motorcycle Gangs and have been certified as an expert in that area in Federal Court and Kansas State Court. I have been the case agent in the prosecutions of over 200 federal defendants for methamphetamine, marijuana and firearms investigations, including the prosecutions and convictions of over 20 members of the El Forastero and Galloping Goose Motorcycle Gangs. I have been assigned to the current investigation, involving threats that were made to a witness in an on-going Federal Investigation into the activities of the El Forastero and Galloping Goose Outlaw Motorcycle Clubs/Gangs by Galloping Goose member, John Angell. Based upon my investigation, along with information provided to me by the victim, Michael J. Hensley, I believe the following to be true and correct.

2. On June 10, 2007, Michael J. Hensley, a/k/a “Joe Poke,” a member of the Galloping Goose Motorcycle Gang, was indicted along with ten other members of the El Forastero and Galloping Goose Motorcycle Gangs for conspiracy to distribute methamphetamine, marijuana and cocaine.

3. On January 31, 2008, Michael J. Hensley entered into a cooperation agreement with the government where he agreed to provide information regarding criminal acts that were committed by members of the El Forastero and Galloping Goose Motorcycle Gangs.

4. Consistent with that agreement, Michael J. Hensley testified at the jury trial of another known member of the El Forastero Motorcycle Gang in a trial that commenced on February 4, 2008, before the Honorable Fernando J. Gaitan.

5. Over the course of several interviews with Hensley he provided information to the Affiant about several members of the El Forastero and Galloping Goose Motorcycle Gangs, including John Angell, regarding their involvement in the procurement and distribution of methamphetamine, cocaine, and marijuana.

6. Because of the sheer number of gang members, the individual members were indicted in separate indictments or charged, by agreement, via information. The first indictments related to this investigation were returned in October 2006. Consequently, discovery has been an on-going process and Hensley's information was provided to each particular defendant as it became available and was reduced to a written report. Through this process, and because he testified against another member, it was/is widely known that Hensley was cooperating with law enforcement officials.

7. While being housed at the Corrections Corporation of America (CCA), Michael J. Hensley received death threats from other incarcerated gang members and associates of the El Forastero and Galloping Goose Motorcycle Gangs. From interviewing witnesses, including Hensley, to those threats, the threats were a product of Hensley's cooperation in this investigation. During one of the incidents that Hensley advised occurred on 12-01-08, El Forastero Senior Board Member, William Eneff, a/k/a "Muff," passed Hensley in the Medical Pod at CCA after Hensley had a tooth pulled. Hensley advised that as he left the Medical Pod Eneff stated "I can't believe it, I am seeing a walking dead man." Several separate incidents involving threats have also been reported by other inmates within CCA. To date, five corroborating witnesses have been located and have agreed to testify to similar threats that they observed.

8. On August 31, 2009, at approximately 1705 hours, Affiant contacted Michael J. Hensley in an interview room in the Investigations Bureau in reference to threats that he had received on this date. Hensley advised that he had been at his residence, located at 3601 Gibbs, Kansas City, Kansas, at approximately 1115 hours today. Hensley stated that he had been cleaning out the residence due to the fact that his ex-girlfriend had trashed it before she moved out. Hensley advised that he had the windows open in the house because it was a nice day. Hensley further advised that he heard a big truck going slowly past the residence and he looked outside and observed that there was a light blue late 80's or early 90's Chevy pick-up driving in front of the big truck. Hensley advised that the subject in the Chevy truck waved the bigger truck past him and that the Chevy truck then backed up and pulled into Hensley's driveway.

9. Hensley advised that as he exited the residence the subject in the truck was getting out of the truck and approaching the residence. Hensley advised that he recognized the subject as being John Angell, a member of the Galloping Goose Motorcycle Gang, a former club brother. Hensley advised that when Angell saw him, Angell stated "Oh you're out." Hensley advised that he told Angell that he had been out about a month. Hensley advised that Angell then stated "that's what snitching will get ya, you can get out." Hensley advised that Angell then stated "well as far as I am concerned the club and I consider you a dead man walking." Hensley advised that he

asked Angell what he was trying to say, to which Angell replied, “well, I consider you a walking dead man.”

10. At that point, Hensley reported that he told Angell he wished he would get off of his property because he was on private property. Hensley advised that Angell stated that he would go. Hensley advised that he told Angell that he found it interesting that Angell and some of the other members had never been indicted and that Angell had no response, but stated before he left “well you heard what I said, consider yourself a dead man walking.” Hensley advised that Angell then left the area in the Chevy truck.

11. On September 2, 2009, a records check determined that John B. Angell has a 1992 Chevy, ¾ ton, conventional two-door truck registered in his name.

FURTHER AFFIANT SAYETH NAUGHT.

/s/ Steve Cook
Steve Cook, Detective
Independence, Missouri Police Department

Subscribed and sworn to before me this 2nd day of September, 2009.

/s/ Robert E. Larsen

HONORABLE ROBERT E. LARSEN United
States Magistrate Judge Western District of
Missouri