

# United States District Court

## WESTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA

v.

JOHN B. ANGELL,  
[DOB: 12/03/65]

18 U.S.C. § 1513(b)(2) and (g)  
NMT 20 Years Imprisonment  
NMT \$250,000.00 Fine  
NMT 5 Years Supervised Release  
\$100 Mandatory Special Assessment  
Class B Felony

### CRIMINAL COMPLAINT

**Case Number: 09-0128-REL-01**

I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

On or about August 31, 2009 in Jackson County, in the Western District of Missouri, and elsewhere, the defendant JOHN B. ANGELL, did knowingly engage in conduct, and attempt to engage in conduct threatening to cause bodily injury to Michael J. Hensley, with the intent to retaliate against Michael J. Hensley for information given by him to Detective Steve Cook, a law enforcement officer with the Independence, Missouri Police Department, relating to the commission of Federal Narcotics offenses pursuant to Title 21 by members of the El Forestero and Galloping Goose Motorcycle Clubs; all in violation of Title 18, United States Code, Sections 1513(b)(2) and (g).

I further state that I am a Detective of the Independence, Missouri Police Department and that this complaint is based on the following facts:

(See attached Affidavit)

Continued on the attached sheet and made a part hereof:  Yes  No.

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

Sworn to before me and subscribed in my presence,

September 2, 2009  
Date

at Kansas City, Missouri  
City and State

ROBERT E. LARSEN  
United States Magistrate Judge  
Name and Title of Judicial Officer

/s/ Robert E. Larsen  
Signature of Judicial Officer