

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES OF AMERICA,)	No. _____
)	
Plaintiff,)	COUNT ONE: All defendants
)	21 U.S.C. §§ 841(a)(1), 841(b)(1)(A) and 846
v.)	NLT 10 Years; NMT Life Imprisonment
)	NMT \$4,000,000 Fine
JOHN B. ANGELL,)	Supervised Release: NLT 5 Years
[DOB: 12/03/65])	Class A Felony
)	
ERIC G. BURKITT,)	COUNT TWO: Defendant Angell
A/K/A "LITTLE ERIC")	18 U.S.C. § 1513(b)(2) and (g)
[DOB:08/07/84])	NMT 20 Years Imprisonment
)	NMT \$250,000 Fine
ROBERT E. STEWART,)	Supervised Release: NMT 5 Years
[DOB: 11/26/57])	Class B Felony
)	
JAMES M. COX,)	\$100 Mandatory Special Assessment for each
A/K/A "LIBERTY JIM")	Count of conviction
[DOB: 02/27/55])	
)	
STEVE W. LARSON,)	
[DOB: 06/10/59])	
)	
AND)	
)	
NICHOLAS E. DONKERSLOOT,)	
[DOB: 03/21/74])	

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

That between on or about January 1, 2002, to and including July 31, 2007, said dates being approximate, in the Western District of Missouri and elsewhere, JOHN B. ANGELL, ERIC G. BURKITT, a/k/a “Little Eric,” ROBERT E. STEWART, JAMES M. COX, a/k/a “Liberty Jim,” STEVE W. LARSON, and NICHOLAS E. DONKERSLOOT, defendants herein, did knowingly and intentionally combine, conspire, confederate and agree with each other and others, both known and unknown to the grand jury, to distribute: (1) a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in an amount of five hundred (500) grams or more; (2) cocaine, a Schedule II controlled substance; and (3) marijuana, a Schedule I controlled substance contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), all in violation of Title 21, United States Code, Section 846.

COUNT TWO

That on or about August 31, 2009, in the Western District of Missouri and elsewhere, JOHN B. ANGELL, defendant herein, did knowingly engage in conduct, and attempt to engage in conduct, threatening to cause bodily harm to Michael J. Hensley, with the intent to retaliate against Michael J. Hensley for information provided 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, United States Code Section 841(a)(1) *et seq.* by members of the El Forastero and Galloping Goose

Motorcycle Clubs; contrary to the provisions of Title 18, United States Code, Sections 1513(b)(2) and (g).

A TRUE BILL.

/s/ Constance Durrell
FOREPERSON OF THE GRAND JURY

/s/ Daniel M. Nelson
Daniel M. Nelson #53885
Assistant United States Attorney

Dated: 9/23/09
Kansas City, Missouri