

AHM/wgl November 2002
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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

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U.S. DISTRICT COURT
N.D. OF ALABAMA

UNITED STATES OF AMERICA)

-v-

CASE NO. CR-02-BE-0528-S

EVERETT LEON STOUT,)

also known as)

"Everett Leon., Stout;")

SHIRLEY JOAN HARPER,)

-and-)

✓ HAROLD TYRONE HARMON, SR.)

INDICTMENT

Introduction

At all times material to this Indictment:

(1) Diamond Financial Pure Trust (hereafter, "Diamond Financial") purported to be an unincorporated association located at 2050 South School Avenue, Fayetteville, Arkansas, that was owned and operated by defendant Everett Leon Stout, also known as *"Everett Leon., Stout;"*

(2) Defendant Everett Leon Stout, also known as *"Everett Leon., Stout;"* acted as an agent for Diamond Financial.

(3) Sovereign Accounting; a Common Law Pure Trust (hereafter, "Sovereign Accounting") purported to be an Arkansas-based unincorporated association comprised of Everett Leon Stout, also known as *"Everett Leon., Stout;"* and others.

(4) Everett Leon Stout, also known as *"Everett Leon., Stout;"* and Sovereign Accounting claimed to have a multi-million dollar court judgment against a company called Conseco

Finance Servicing Corp. (hereafter, "Conseco Finance"), which the defendants referred to as "Conseco Financial."

(5) Everett Leon Stout, also known as "*Everett Leon., Stout;*" used a document entitled "Registered Security Certificate," which purported to be a negotiable instrument backed by the said judgment against Conseco Finance, as payment for motor vehicles he acquired for and on behalf of Diamond Financial.

(6) The "Registered Security Certificate" used by Everett Leon Stout to purchase vehicles was worthless, in that neither Stout nor Sovereign Accounting had a valid judgment against Conseco Finance.

(7) The 2001 Pontiac Firebird purchased by Cindy and Thad Hood was being financed by the Alabama Telco Credit Union.

(8) The 2000 Chevrolet Blazer purchased by Kevin Brown was being financed by the General Motors Acceptance Corporation (hereafter, "GMAC").

(9) The 2001 Nissan Altima purchased by Charles I. Woods was being financed by Regions Bank.

(10) The 2000 Chevrolet ("Silverado") C1500 pick up truck leased by Kevin Oakes was being financed by Regions Bank.

(11) The 2001 Pontiac Bonneville purchased by Jill L. Potts was being financed by GMAC.

(12) The 2000 Ford Taurus purchased by James Stuckey was being financed by Ford Motor Credit.

(13) The 2000 Ford Mustang purchased by Timothy S. Sheridan was being financed by Ford Motor Credit.

COUNT ONE: (18 U.S.C. § 371)

The Grand Jury charges:

A. The Grand Jury realleges and incorporates by references those matters contained in the Introduction, as though fully set forth herein.

B. That from in or about the month of November 2001, until on or about the 17th day of January, 2002, within the Northern District of Alabama and elsewhere, the defendants,

EVERETT LEON STOUT,
also known as
"Everett Leon., Stout;"
SHIRLEY JOAN HARPER,
-and-
HAROLD TYRONE HARMON, SR.,

did knowingly and willfully conspire with each other and with others whose identities are both known and unknown to the Grand Jury, to commit an offense against the United States, that is, to transport in interstate commerce a motor vehicle and cause the same to be so transported, knowing the said motor vehicle to have been stolen, in violation of Title 18, United States Code, Section 2312, all in violation of Title 18, United States Code, Section 371.

OBJECT OF THE CONSPIRACY

C. It was the object of the conspiracy that the defendants would and did steal motor vehicles, by purchasing them with worthless documents purporting to be valid negotiable instruments secured by a judgment against Consecro Finance and, thereafter, transport the said stolen motor vehicles to locations outside the State of Alabama.

OVERT ACTS

D. In furtherance of the conspiracy and to effect the objects thereof, the defendants committed certain overt acts within the Northern District of Alabama and elsewhere, including, but not limited to, the following:

(1) On or about December 12, 2001, Everett Leon Stout (hereafter, "defendant Stout") placed a telephone call to Cindy Hood, to discuss the purchase of her 2001 Pontiac Firebird which was being advertised for sale in the Birmingham News.

(2) On or about December 14, 2001, defendant Stout and Shirley Joan Harper (hereafter, "defendant Harper") drove to Calera, Alabama in a Honda Accord, where Stout met Cindy Hood's husband, Thad Hood, and discussed the terms of the sale.

(3) On or about December 14, 2001, defendant Stout obtained a copy of the title to the Pontiac Firebird at the Alabama Telco Credit Union.

(4) On or about December 14, 2001, defendants Stout and Harper traveled to the Shelby County Courthouse in Columbiana, Alabama, where defendant Stout met Cindy Hood and her husband, Thad Hood.

(5) On or about December 14, 2001, defendant Stout completed and signed a document entitled "Uniform Bill of Sale For All States Under Common and Statute Law," by which Cindy and Thad Hood agreed to sell their Pontiac Firebird to Diamond Financial for \$22,065.71. At/about that same time, defendant Stout also completed and signed a "Registered Security Certificate," made payable to Thad and Cindy Hood and/or Alabama Telco Credit Union, in the amount of \$22, 065.71, which defendant Stout used in payment for the said vehicle.

(6) On or about December 14, 2001, defendant Stout caused a copy of the documents to be recorded in the public record of the Shelby County Probate Office.

(7) On or about December 14, 2001, defendant Stout caused an envelope containing another set of the documents to be mailed to the Alabama Telco Credit Union.

(8) On or about December 14, 2001, defendant Stout drove the said Pontiac Firebird from Shelby County, Alabama to defendant Harper's residence in Blue Springs, Mississippi.

(9) On or about December 14, 2001, defendant Harper returned to her residence in Mississippi, driving the Honda Accord.

(10) On or about December 26, 2001, Harold Tyrone Harmon, Sr. (hereafter, "defendant Harmon") spoke by telephone to a representative of the Alabama Telco Credit Union, giving false assurances that the credit union would receive payment for the Pontiac Firebird from Conseco Finance.

(11) On or about December 16, 2001, defendant Stout placed a telephone call to John Brown, to discuss the purchase of a 2000 Chevrolet Blazer owned by his brother, Kevin D. Brown, which was being advertised for sale in the Birmingham News.

(12) On or about December 17, 2001, defendants Stout and Harper drove to Birmingham, Alabama in a Pontiac Firebird, where Stout met John and Kevin D. Brown and discussed the terms of the sale.

(13) On or about December 17, 2001, defendants Stout and Harper traveled to the Jefferson County Courthouse in Birmingham, Alabama, to record documents dealing with the purchase of the Blazer.

(14) On or about December 17, 2001, defendant Stout completed and signed a document entitled "Uniform Bill of Sale For All States Under Common and Statute Law," by which Kevin D. Brown agreed to sell his Chevrolet Blazer to Diamond Financial for \$19,019.67. At/about that same time, defendant Stout also completed and signed a "Registered Security Certificate," made payable to Kevin D. Brown and/or GMAC Corp., in the amount of \$19,019.67, which defendant Stout used in payment for the said vehicle.

(15) On or about December 17, 2001, defendant Stout caused a copy of the said documents to be recorded in the public record of the Jefferson County Probate Office.

(16) On or about December 17, 2001, defendant Stout caused an envelope containing another set of these documents to be mailed to the General Motors Acceptance Corporation (GMAC).

(17) On or about December 17, 2001, defendant Stout drove the said Chevrolet Blazer to a Birmingham-area truck stop, where he stored the vehicle temporarily.

(18) Sometime in the latter part of December, 2001, a more specific time being otherwise unknown, defendant Stout caused the said Chevrolet Blazer to be driven from the truck stop in Birmingham to the residence of defendant Harmon in Fayetteville, Arkansas.

(19) On or about December 15, 2001, defendant Stout placed a telephone call to Angela Woods, to discuss the purchase of her husband's 2001 Nissan Altima which was being advertised for sale in the Birmingham News.

(20) On or about December 17, 2001, defendants Stout and Harper drove to Hoover, Alabama in a Pontiac Firebird, where Stout met Angela Woods and discussed the terms of the sale.

(21) On or about December 18, 2001, defendants Stout and Harper traveled to the Jefferson County Courthouse in Birmingham, Alabama, to record documents dealing with the purchase of the Altima.

(22) On or about December 18, 2001, defendant Stout completed and signed a document entitled "Uniform Bill of Sale For All States Under Common and Statute Law," by which Angela Woods' husband, Charles I. Woods, agreed to sell the Nissan Altima to Diamond Financial for \$17,595.93. At/about that same time, defendant Stout also completed and signed a "Registered Security Certificate," made payable to Charles I. Woods and/or Regions Bank, in the amount of \$17,595.93, which defendant Stout used as payment for the said vehicle.

(23) On or about December 18, 2001, defendant Stout caused a copy of the said documents to be recorded in the public record of the Jefferson County Probate Office.

(24) On or about December 18, 2001, defendant Stout caused an envelope containing another set of these documents to be mailed to Regions Bank.

(25) On or about December 18, 2001, defendant Stout drove the said Nissan Altima to a Birmingham-area truck stop, where he stored the vehicle temporarily.

(26) Sometime in the latter part of December, 2001, a more specific time being otherwise unknown, defendant Stout caused the said Nissan Altima to be driven from the truck stop in Birmingham to the residence of defendant Harmon in Fayetteville, Arkansas.

(27) On or about December 17, 2001, defendant Stout placed a telephone call to Kevin Oakes' father-in-law, to discuss the purchase of Mr. Oakes' 2000 Chevrolet C1500 pickup truck ("Silverado") which was being advertised for sale in the Birmingham News.

(28) On or about December 18, 2001, defendants Stout and Harper drove to

Pelham, Alabama in a Pontiac Firebird, where defendant Stout met Kevin Oakes and discussed the terms of the sale.

(29) On or about December 18, 2001, defendants Stout and Harper traveled to the Shelby County Courthouse in Columbiana, Alabama, to record documents dealing with the purchase of the pickup truck.

(30) On or about December 18, 2001, defendant Stout completed and signed a document entitled "Uniform Bill of Sale For All States Under Common and Statute Law," by which Kevin Oakes agreed to sell his Chevrolet C1500 pickup truck to Diamond Financial for \$18,372.15. At/about that same time, defendant Stout also completed and signed a "Registered Security Certificate," made payable to Kevin Oakes and/or Regions Bank, in the amount of \$18,372.15, which defendant Stout used in payment for the said vehicle.

(31) On or about December 18, 2001, defendant Stout caused a copy of these documents to be recorded in the public record of the Shelby County Probate Office.

(32) On or about December 18, 2001, defendant Stout caused an envelope containing another set of these documents to be mailed to Regions Bank.

(33) On or about December 18, 2001, defendant Stout drove the said Chevrolet C1500 pickup truck to a Birmingham-area truck stop, where he store it temporarily.

(34) Sometime in the latter part of December 2001, a more particular time being otherwise unknown, defendant Stout caused the pickup truck to be driven from the truck stop in Birmingham to the residence of defendant Harmon in Fayetteville, Arkansas.

(35) On or about December 18, 2001, defendant Stout placed a telephone call to Jill L. Potts, to discuss the purchase of her 2001 Pontiac Bonneville which was being advertised for sale in the Birmingham News.

(36) On or about December 18, 2001, defendants Stout and Harper drove to a Shoney's Restaurant in Shelby County, Alabama in the Pontiac Firebird previously noted, where defendant Stout met Jill Potts and discussed the terms of the sale.

(37) On or about December 18, 2001, defendant Stout traveled to the Shelby County Courthouse in Columbiana, Alabama, to record documents dealing with the purchase of the Bonneville.

(38) On or about December 18, 2001, defendant Stout completed and signed a document entitled "Uniform Bill of Sale For All States Under Common and Statute Law," by which Jill Potts agreed to sell her Pontiac Bonneville to Diamond Financial for \$28,611.57. At/about that same time, defendant Stout also completed and signed a "Registered Security Certificate," made payable to Jill L. Potts and/or GMAC, in the amount of \$28,611.57, which defendant Stout used in payment for the said vehicle.

(39) On or about December 18, 2001, defendant Stout caused a copy of these documents to be recorded in the public record of the Shelby County Probate Office.

(40) On or about December 18, 2001, defendant Stout caused an envelope containing another set of these documents to be mailed to GMAC.

(41) On or about December 18, 2001, defendant Stout drove the said Pontiac Bonneville to defendant Harper's residence in Blue Springs, Mississippi.

(42) On or about December 18, 2001, defendant Harper returned to her residence in Mississippi, driving the said Pontiac Firebird.

(43) On or about December 19, 2001, defendant Stout placed a telephone call to James M. Stuckey, to discuss the purchase of his 2000 Ford Taurus which was being advertised for sale in the Birmingham News.

(44) On or about December 19, 2001, defendants Stout and Harper drove a Pontiac Bonneville to the Dollar General Store in Woodstock, Alabama, where defendant Stout met James M. Stuckey and discussed the terms of the sale.

(45) On or about December 19, 2001, defendant Stout traveled to the Bibb County Courthouse in Centreville, Alabama, to record documents dealing with the purchase of the Taurus.

(46) On or about December 19, 2001, defendant Stout completed and signed a document entitled "Uniform Bill of Sale For All States Under Common and Statute Law," by which James M. Stuckey agreed to sell his Ford Taurus to Diamond Financial for \$13,581.03. At/about that same time, defendant Stout also completed and signed a "Registered Security Certificate," made payable to James M. Stuckey and/or Ford Motor Credit, in the amount of \$13,581.03, which defendant Stout used in payment for the said vehicle.

(47) On or about December 19, 2001, defendant Stout caused a copy of these documents to be recorded in the public record of the Bibb County Probate Office.

(48) On or about December 19, 2001, defendant Stout caused an envelope containing another set of these documents to be mailed to Ford Motor Credit.

(49) On or about December 19, 2001, defendant Stout drove the said Ford Taurus to a location outside the State of Alabama.

(50) In or about the middle of December 2001, defendant Stout placed a telephone call to Timothy S. Sheridan, to discuss the purchase of his 2000 Ford Mustang, which was being advertised for sale in the Birmingham News.

(51) On or about December 19, 2001, defendant Stout met Timothy S. Sheridan at a truck stop in Birmingham, Alabama to look at Sheridan's vehicle.

(52) On or about January 2, 2002, defendant Stout met Timothy S. Sheridan again at the truck stop in Birmingham and discussed the terms of the sale.

(53) On or about January 7, 2002, defendants Stout and Harper drove to the Jefferson County Courthouse in Birmingham, Alabama in the Pontiac Bonneville previously noted, to record documents dealing with the purchase of the Mustang.

(54) On or about January 7, 2002, defendant Stout completed and signed a document entitled "Uniform Bill of Sale For All States Under Common and Statute Law," by which Timothy S. Sheridan agreed to sell his Ford Mustang to Diamond Financial for \$11,862.47. At/about that same time, defendant Stout also completed and signed a "Registered Security Certificate," made payable to Timothy S. Sheridan and/or Ford Motor Credit, in the amount of \$11,862.47, which defendant Stout used in payment for the said vehicle.

(55) On or about January 7, 2002, defendant Stout caused a copy of these documents to be recorded in the public record of the Jefferson County Probate Office.

(56) On or about January 7, 2002, defendant Stout caused an envelope containing another set of these documents to be mailed to Ford Motor Credit.

(57) On or about January 7, 2002, defendant Stout drove the said Ford Mustang to a location in/near Atlanta, Georgia.

(58) On or about January 7, 2002, defendant Harper followed defendant Stout to Georgia, driving the Pontiac Bonneville.

All in violation of Title 18, United States Code, Section 371.

COUNTS TWO through EIGHT: (18 U.S.C. § 2312)

The Grand Jury charges:

1. That on or about the date listed below, within the Northern District of Alabama, the defendant,

EVERETT LEON STOUT,
also known as
“Everett Leon., Stout;”

did transport and cause to be transported in interstate commerce a motor vehicle, as more particularly described hereafter by make, model, and owner, knowing the said motor vehicle to have been stolen.

2. The allegations contained in paragraph 1, above, are hereby realleged and incorporated by reference for each of the following counts, as though full set forth therein:

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION OF VEHICLE</u>	<u>OWNER</u>
TWO	12/14/01	2001 Pontiac Firebird	Cindy/Thad Hood
THREE	12/18/01	2001 Pontiac Bonneville	Jill Potts
FOUR	12/19/01	2000 Ford Taurus	James Stuckey
FIVE	December 2001	2000 Chevrolet Blazer	Kevin Brown

SIX	December 2001	2001 Nissan Altima	Angela Woods
SEVEN	December 2001	2000 Chevrolet C1500 pick up truck	Kevin Oakes
EIGHT	01/07/02	2000 Ford Mustang	Timothy Sheridan

All in violation of Title 18, United States Code, Section 2312.

COUNTS NINE and TEN: (18 U.S.C. § 2312)

The Grand Jury charges:

1. That on or about the date listed below, within the Northern District of Alabama, the defendant,

HAROLD TYRONE HARMON, SR.,

did transport and cause to be transported in interstate commerce a motor vehicle, as more particularly described hereafter by make, model, and owner, knowing the said motor vehicle to have been stolen.

2. The allegations contained in paragraph 1, above, are hereby realleged and incorporated by reference for each of the following counts, as though full set forth therein:

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION OF VEHICLE</u>	<u>OWNER</u>
NINE	12/19/01	2000 Ford Taurus	James Stuckey
TEN	December 2001	2000 Chevrolet C1500 pick up truck	Kevin Oakes

All in violation of Title 18, United States Code, Section 2312.

COUNT ELEVEN: (18 U.S.C. § 2312)

The Grand Jury charges:

1. That on or about January 7, 2002, within the Northern District of Alabama, the defendant,

SHIRLEY JOAN HARPER,

did transport and cause to be transported in interstate commerce a motor vehicle, that being , a 2001 Pontiac Bonneville owned by Jill Potts, knowing the said motor vehicle to have been stolen, in violation of Title 18, United States Code, Section 2312.

COUNT TWELVE: (18 U.S.C. § 1341)

The Grand Jury charges:

1. That from on or about November 2001, until on or about the 17th day of January, 2002, within the Northern District of Alabama, the defendant,

EVERETT LEON STOUT,
also known as
“Everett Leon., Stout;”

devised and intended to devise a scheme and artifice to defraud and to obtain property by means of false and fraudulent pretenses and representations, well-knowing at the time that the pretenses and representations would be and were false and fraudulent when made, said scheme and artifice being in substance that which is described in Count One of this Indictment.

2. That on or about the 14th day of December, 2001, within the Northern District of Alabama, the defendant,

EVERETT LEON STOUT,
also known as
"Everett Leon., Stout;"

for the purpose of executing and attempting to execute the scheme and artifice to defraud, did willfully cause to be placed in an authorized depository for mail matter to be delivered by the Postal Service, an envelope addressed to Alabama Telco Credit Union, P.O. Box 360287, Birmingham, Alabama 35236, said envelope containing a document entitled "Registered Security Certificate," made payable to Thad and Cindy Hood and/or Alabama Telco Credit Union, in the amount of \$22,065.71, in violation of Title 18, United States Code, Section 1341.

COUNT THIRTEEN: (18 U.S.C. § 1341)

The Grand Jury charges:

1. The Grand Jury realleges and incorporates by reference all of the allegations contained in Count Twelve of this Indictment, except for those allegations contained in the last paragraph thereof.
2. That on or about the 16th day of December, 2001, within the Northern District of Alabama, the defendant,

EVERETT LEON STOUT,
also known as
"Everett Leon., Stout;"

for the purpose of executing and attempting to execute the scheme and artifice to defraud, did willfully cause to be placed in an authorized depository for mail matter to be delivered by the Postal Service, an envelope addressed to the General Motors Acceptance Corporation (GMAC), P.O. Box 105677, Atlanta, GA 30348, said envelope containing a document entitled "Registered

Security Certificate," made payable to Kevin D. Brown and/or GMAC Corp., in the amount of \$19,019.67, in violation of Title 18, United States Code, Section 1341.

COUNT FOURTEEN: (18 U.S.C. § 1341)

The Grand Jury charges:

1. The Grand Jury realleges and incorporates by reference all of the allegations contained in Count Twelve of this Indictment, except for those allegations contained in the last paragraph thereof.

2. That on or about the 18th day of December, 2001, within the Northern District of Alabama, the defendant,

EVERETT LEON STOUT,
also known as
"Everett Leon., Stout;"

for the purpose of executing and attempting to execute the scheme and artifice to defraud, did willfully cause to be placed in an authorized depository for mail matter to be delivered by the Postal Service, an envelope addressed to the Regions Bank, P.O. Box 4409, Bridgeton, Missouri 63044-0409, said envelope containing a document entitled "Registered Security Certificate," made payable to Charles I. Woods and/or Regions Bank, in the amount of \$17,595.93, in violation of Title 18, United States Code, Section 1341.

COUNT FIFTEEN: (18 U.S.C. § 1341)

The Grand Jury charges:

1. The Grand Jury realleges and incorporates by reference all of the allegations contained in Count Twelve of this Indictment, except for those allegations contained in the last paragraph thereof.

2. That on or about the 18th day of December, 2001, within the Northern District of Alabama, the defendant,

EVERETT LEON STOUT,
also known as
"Everett Leon., Stout;"

for the purpose of executing and attempting to execute the scheme and artifice to defraud, did willfully cause to be placed in an authorized depository for mail matter to be delivered by the Postal Service, an envelope addressed to Lease Servicing Group, P.O. Box 2638, Pittsburgh, PA15230-2638, ATTN: Lease Payoff Department, said envelope containing a document entitled "Registered Security Certificate," made payable to Kevin Oakes and/or Regions Bank, in the amount of \$18,327.15, in violation of Title 18, United States Code, Section 1341.

COUNT SIXTEEN: (18 U.S.C. § 1341)

The Grand Jury charges:

1. The Grand Jury realleges and incorporates by reference all of the allegations contained in Count Twelve of this Indictment, except for those allegations contained in the last paragraph thereof.

2. That on or about the 18th day of December, 2001, within the Northern District of Alabama, the defendant,

EVERETT LEON STOUT,
also known as
"Everett Leon., Stout;"

for the purpose of executing and attempting to execute the scheme and artifice to defraud, did willfully cause to be placed in an authorized depository for mail matter to be delivered by the Postal Service, an envelope addressed to GMAC, P.O. Box 105677, Atlanta, GA 30348, said envelope containing a document entitled "Registered Security Certificate," made payable to Jill L. Potts and/or GMAC, in the amount of \$28,611.57, in violation of Title 18, United States Code, Section 1341.

COUNT SEVENTEEN: (18 U.S.C. § 1341)

The Grand Jury charges:

1. The Grand Jury realleges and incorporates by reference all of the allegations contained in Count Twelve of this Indictment, except for those allegations contained in the last paragraph thereof.

2. That on or about the 19th day of December, 2001, within the Northern District of Alabama, the defendant,

EVERETT LEON STOUT,
also known as
"Everett Leon., Stout;"

for the purpose of executing and attempting to execute the scheme and artifice to defraud, did willfully cause to be placed in an authorized depository for mail matter to be delivered by the

Postal Service, an envelope addressed to Ford Credit, Department A, P.O. Box 689007, Franklin, TN 37068-9007, said envelope containing a document entitled "Registered Security Certificate," made payable to James M. Stuckey and/or Ford Motor Credit, in the amount of \$13,581.03, in violation of Title 18, United States Code, Section 1341.

COUNT EIGHTEEN: (18 U.S.C. § 1341)

The Grand Jury charges:

1. The Grand Jury realleges and incorporates by reference all of the allegations contained in Count Twelve of this Indictment, except for those allegations contained in the last paragraph thereof.

2. That on or about the 7th day of January, 2002, within the Northern District of Alabama, the defendant,

EVERETT LEON STOUT,
also known as
"Everett Leon., Stout;"

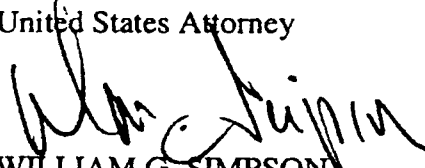
for the purpose of executing and attempting to execute the scheme and artifice to defraud, did willfully cause to be placed in an authorized depository for mail matter to be delivered by the Postal Service, an envelope addressed to Ford Credit, Department A, P.O. Box 689007, Franklin, TN 37068-9007, said envelope containing a document entitled "Registered Security Certificate,"

made payable to Timothy S. Sheridan and/or Ford Motor Credit, in the amount of \$11,862.47, in violation of Title 18, United States Code, Section 1341.

A TRUE BILL


FOREMAN OF THE GRAND JURY

ALICE H. MARTIN
United States Attorney


WILLIAM G. SIMPSON
Assistant United States Attorney