

FILED

JAN 8 2020

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY KFS

UNITED STATES OF AMERICA,	§	CRIMINAL NO: 5:18-CR-390-OLG	DEPUTY
	§		
Plaintiff,	§	<u>SUPERSEDING INDICTMENT</u>	
VS.	§	Cts 1 and 2: 18 U.S.C. §§922(g)(1)	
	§	Felon in Possession of a Firearm	
ROBERT MIKELL USSERY,	§		
aka "Side Thorn" (1) and	§	Cts 3 and 4: 18 U.S.C. §§922(g)(1) and 2	
JODIE MARIE MANN,	§	Felon in Possession of a Firearm and	
aka "Conspiracy Granny" (2),	§	Aiding and Abetting	
	§		
Defendants.	§		

THE GRAND JURY CHARGES:

COUNT ONE
[18 U.S.C. §922(g)(1)]

On or about March 5, 2018, in the Western District of Texas, Defendant,

ROBERT MIKELL USSERY, aka "Side Thorn" (1),

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed ~~ammunition~~ ^{ammunition} and a firearm, to wit, a black and silver semi-automatic striker-fire pistol, caliber unknown, serial number unknown, and the ammunition and firearm had travelled in interstate and foreign commerce, in violation of 18 U.S.C. §922(g)(1).

COUNT TWO
[18 U.S.C. §922(g)(1)]

On or about May 23, 2018, in the Western District of Texas, Defendant,

ROBERT MIKELL USSERY, aka "Side Thorn" (1),

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed ~~ammunition~~ ^{ammunition} and firearms, to wit, a Mossberg, Model 500, 12 gauge shotgun, serial number J310149, a Harrington and Richardson, model 088, 410

caliber shotgun, serial number BA427672, a Smith and Wesson, model M&P 15, 556 caliber rifle, serial number 50683, Serbu Firearms, Model BFG50, 50 BMG caliber rifle, serial number 2001, a Marlin Firearms Co., model 60W, 22 caliber rifle, serial number 10381396, a Hesse Ltd, model HAR-15A2, 223 caliber rifle, serial number 002685, a Taurus International, model PT740 SLIM, 40 pistol, serial number SIT98279, a Taurus International, model PT740 SLIM, 40 caliber pistol, serial number SIS86087, a Taurus International, model PT145 PRO, 45 caliber pistol, serial number NCU70357, a Davis Industries, Derringer, model D9, 9mm pistol, serial number D128874, and the ammunition and firearms had travelled in interstate and foreign commerce, in violation of 18 U.S.C. §922(g)(1).

COUNT THREE
[18 U.S.C. §§922(g)(1) and 2]

On or about March 5, 2018, in the Western District of Texas, Defendant,

JODIE MARIE MANN, aka “Conspiracy Granny” (2),

knowing Robert Mikell Ussery had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, aided and abetted Robert Mikell Ussery, who knew he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, in the knowing possession of ammunition and a firearm, to wit, a black and silver semi-automatic striker-fire pistol, caliber unknown, serial number unknown, and the ammunition and firearm had travelled in interstate and foreign commerce, in violation of 18 U.S.C. §922(g)(1) and 2.

COUNT FOUR
[18 U.S.C. §§922(g)(1) and 2]

On or about May 23, 2018, in the Western District of Texas, Defendant,

JODIE MARIE MANN, aka “Conspiracy Granny” (2),

knowing Robert Mikell Ussery had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, aided and abetted Robert Mikell Ussery, who knew he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, in the knowing possession of ammunition and firearms to wit, a Mossberg, Model 500, 12 gauge shotgun, serial number J310149, a Harrington and Richardson, model 088, 410 caliber shotgun, serial number BA427672, a Smith and Wesson, model M&P 15, 556 caliber rifle, serial number 50683, Serbu Firearms, Model BFG50, 50 BMG caliber rifle, serial number 2001, a Marlin Firearms Co., model 60W, 22 caliber rifle, serial number 10381396, a Hesse Ltd, model HAR-15A2, 223 caliber rifle, serial number 002685, a Taurus International, model PT740 SLIM, 40 pistol, serial number SIT98279, a Taurus International, model PT740 SLIM, 40 caliber pistol, serial number SIS86087, a Taurus International, model PT145 PRO, 45 caliber pistol, serial number NCU70357, a Davis Industries, Derringer, model D9, 9mm pistol, serial number D128874, and the ammunition and firearms had travelled in interstate and foreign commerce, in violation of 18 U.S.C. §922(g)(1) and 2.

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE

As a result of the criminal violations set forth in Counts One through Four, the United States of America gives notice to the Defendants of its intent to seek the forfeiture of the property described below upon conviction pursuant to FED. R. CRIM. P. 32.2 and 18 U.S.C. § 924, as made applicable to criminal forfeiture by 28 U.S.C. § 2461. Section 924 states in pertinent part:

Title 18 U.S.C. § 924. Penalties

(d)(1) Any firearm or ammunition involved in or used in any knowing violation of subsection . . . (g) . . . of section 922, . . . shall be subject to seizure and forfeiture . . . under the provisions of this chapter. . . .

This Notice of Demand for Forfeiture includes, but is not limited to, the following property:

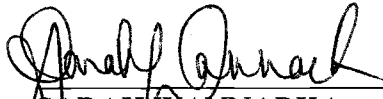
1. Mossberg, Model 500, 12 gauge shotgun, serial number J310149;
2. Harrington and Richardson, model 088, 410 caliber shotgun, serial number BA427672;
3. Smith and Wesson, model M&P 15, 556 caliber rifle, serial number 50683;
4. Serbu Firearms, Model BFG50, 50 BMG caliber rifle, serial number 2001;
5. Marlin Firearms Co., model 60W, 22 caliber rifle, serial number 10381396;
6. Hesse Ltd, model HAR-15A2, 223 caliber rifle, serial number 002685;
7. Taurus International, model PT740 SLIM, 40 pistol, serial number SIT98279;
8. Taurus International, model PT740 SLIM, 40 caliber pistol, serial number SIS86087;
9. Taurus International, model PT145 PRO, 45 caliber pistol, serial number NCU70357;
10. Davis Industries, Derringer, model D9, 9mm pistol, serial number D128874;
11. Any and all firearms, ammunition, and/or firearm accessories involved in or used in the commission of the criminal offense.

A TRUE BILL


FOREPERSON OF THE GRAND JURY

JOHN F. BASH
UNITED STATES ATTORNEY

BY:


SARAH WANNARKA
Assistant United States Attorney