

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

**UNITED STATES OF AMERICA**

**Plaintiff**

v

**(1) ROBERT MIKELL USSERY**  
**aka Side Thorn**  
**(2) JODIE MARIE MANN**  
**aka Conspiracy Granny**

**Defendants**

**CRIMINAL NO: 5:18-CR-00390-OLG**

**2<sup>ND</sup> SUPERSEDING INDICTMENT**

**COUNTS 1 & 2: 18 U.S.C. § 922(g)(1)**  
**Felon in Possession of a Firearm**

**COUNTS 3 & 04: 18 U.S.C. § 922(g)(1); 2**  
**Felon in Possession of a Firearm; Aiding**  
**and Abetting**

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,

**(1) ROBERT MIKELL USSERY aka Side Thorn**

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, to wit, a black and silver semi-automatic striker-fired pistol, caliber unknown, serial number unknown, and the 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,

**(1) ROBERT MIKELL USSERY aka Side Thorn**

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed firearms, to wit,

1. a Mossberg, Model 500, 12 gauge shotgun, serial number J310149,
2. a Harrington and Richardson, model 088, .410 caliber shotgun, serial number BA427672,
3. a Smith and Wesson, model M&P 15, 5.56 caliber rifle, serial number 50683,
4. a Serbu Firearms, Model BFG50, .50 BMG caliber rifle, serial number 2001,
5. a Marlin Firearms Co., model 60W, .22 caliber rifle, serial number 10381396,
6. a Hesse Ltd, model HAR-15A2, .223 caliber rifle, serial number 002685,
7. a Taurus International, model PT740 SLIM, .40 caliber pistol, serial number SIT98279,
8. a Taurus International, model PT740 SLIM, .40 caliber pistol, serial number SIS86087,
9. a Taurus International, model PT145 PRO, .45 caliber pistol, serial number NCU70357,  
and
10. a Davis Industries, Derringer, model D9, 9mm pistol, serial number D128874,

and the firearms travelled in interstate and foreign commerce, in violation of 18 U.S.C.

§922(g)(1).

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

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

**(2) JODIE MARIE MANN aka Conspiracy Granny**

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 in the knowing possession of a firearm, to wit, a black and silver semi-automatic striker-fire pistol, caliber unknown, serial number unknown, and the firearm had travelled in interstate and foreign commerce, in violation of 18 U.S.C. §§ 2 and 922(g)(1).

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

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

**(2) JODIE MARIE MANN aka Conspiracy Granny**

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 in the knowing possession of firearms to wit,

1. a Taurus International, model PT740 SLIM, .40 caliber pistol, serial number SIT98279, and
2. a Taurus International, model PT740 SLIM, .40 caliber pistol, serial number SIS86087,
3. a Serbu Firearms, Model BFG50, .50 BMG caliber rifle, serial number 2001,

and the firearms travelled in interstate and foreign commerce, in violation of 18 U.S.C. §§ 2 and 922(g)(1).

**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. a Mossberg, Model 500, 12 gauge shotgun, serial number J310149,
2. a Harrington and Richardson, model 088, .410 caliber shotgun, serial number BA427672,
3. a Smith and Wesson, model M&P 15, 5.56 caliber rifle, serial number 50683,
4. a Serbu Firearms, Model BFG50, .50 BMG caliber rifle, serial number 2001,
5. a Marlin Firearms Co., model 60W, .22 caliber rifle, serial number 10381396,
6. a Hesse Ltd, model HAR-15A2, .223 caliber rifle, serial number 002685,
7. a Taurus International, model PT740 SLIM, .40 caliber pistol, serial number SIT98279,
8. a Taurus International, model PT740 SLIM, .40 caliber pistol, serial number SIS86087,
9. a Taurus International, model PT145 PRO, .45 caliber pistol, serial number NCU70357, and
10. a 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

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FOREPERSON OF THE GRAND JURY

ASHLEY C. HOFF  
UNITED STATES ATTORNEY

BY:   
\_\_\_\_\_  
FOR KARINA O'DANIEL  
Assistant United States Attorney