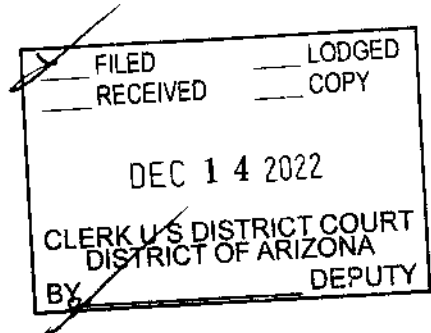


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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,
Plaintiff,

vs.

- 1. Samuel Rappylee Bateman,
(Counts 1-7)
 - 2. Naomi Bistline,
(Counts 4-7)
 - 3. Donnae Barlow, and
(Counts 4-7),
 - 4. Moretta Rose Johnson
(Counts 4-7),
- Defendants.

No. CR-22-08092-PCT-DGC

**REDACTED SUPERSEDING
INDICTMENT**

- VIO: 18 U.S.C. §§ 1512(c)(1) and 2
(Destruction of Records in an
Official Proceeding and Aid and
Abet)
Count 1
- 18 U.S.C. § 1512(c)(2)
(Tampering with an Official
Proceeding)
Count 2
- 18 U.S.C. §§ 1519 and 2
(Destruction of Records in a Federal
Investigation and Aid and Abet)
Count 3
- 18 U.S.C. §§ 1512(c)(2) and 2
(Tampering with an Official
Proceeding and Aid and Abet)
Count 4
- 18 U.S.C. § 1512(k)
(Conspiracy to Tamper with an
Official Proceeding)
Count 5
- 18 U.S.C. §§ 1201(a)(1), (b), and 2
(Kidnapping and Aid and Abet)
Count 6

18 U.S.C. §§ 1201(a)(1), (b), and (c)
(Conspiracy to Kidnap)
Count 7

18 U.S.C. §§ 924(d) and 981;
21 U.S.C. §§ 853 and 881; and
28 U.S.C. § 2461(c)
(Forfeiture Allegation)

THE GRAND JURY CHARGES:

COUNT 1

On or about August 28, 2022, in the District of Arizona, the defendant, SAMUEL RAPPYLEE BATEMAN, and others known and unknown to the grand jury, did corruptly alter, destroy, mutilate, and conceal a record, and attempted to do so, with the intent to impair its integrity and availability for use in a foreseeable criminal proceeding before a Court of the United States, an official proceeding, that is, by deleting and attempting to delete electronic communications associated with Signal accounts.

In violation of Title 18, United States Code, Sections 1512(c)(1) and 2.

COUNT 2

On or about August 28, 2022, in the District of Arizona, the defendant, SAMUEL RAPPYLEE BATEMAN, did corruptly obstruct, influence, and impede a foreseeable prosecution before a Court of the United States, an official proceeding, and attempted to do so, by directing others known and unknown to the grand jury to destroy records, that is, by deleting and attempting to delete electronic communications associated with Signal accounts.

In violation of Title 18, United States Code, Section 1512(c)(2).

COUNT 3

On or about August 28, 2022, in the District of Arizona, the defendant, SAMUEL RAPPYLEE BATEMAN, and others known and unknown to the grand jury, did knowingly alter, destroy, mutilate, and conceal records, that is, electronic communications associated with Signal accounts, with the intent to impede, obstruct, and influence the investigation

1 and proper administration of a matter that the defendant contemplated was within the
2 jurisdiction of the Federal Bureau of Investigation, a department and agency of the United
3 States.

4 In violation of Title 18, United States Code, Sections 1519 and 2.

5 **COUNT 4**

6 On or between November 27 and December 1, 2022, in the District of Arizona and
7 elsewhere, the defendants, SAMUEL RAPPYLEE BATEMAN, NAOMI BISTLINE,
8 DONNAE BARLOW, and MORETTA ROSE JOHNSON, did corruptly obstruct,
9 influence, and impede a foreseeable prosecution before a Court of the United States, an
10 official proceeding, and attempted to do so, by aiding minors to escape Arizona Department
11 of Child Safety custody and evade law enforcement.

12 In violation of Title 18, United States Code, Sections 1512(c)(2) and 2.

13 **COUNT 5**

14 Beginning at a time unknown to the grand jury, but at least on or between November
15 27 and December 1, 2022, in the District of Arizona and elsewhere, the defendants,
16 SAMUEL RAPPYLEE BATEMAN, NAOMI BISTLINE, DONNAE BARLOW,
17 MORETTA ROSE JOHNSON, and others known and unknown to the grand jury, willfully
18 and intentionally conspired and agreed together and with each other to corruptly obstruct,
19 influence, and impede a foreseeable prosecution before a Court of the United States, an
20 official proceeding, by aiding minors to escape Arizona Department of Child Safety
21 custody and evade law enforcement, in violation of Title 18, United States Code, Sections
22 1512(c)(2) and 2.

23 All in violation of Title 18, United States Code, Section 1512(k).

24 **COUNT 6**

25 On or between November 27, 2022 and December 1, 2022, in the District of Arizona
26 and elsewhere, the defendants, SAMUEL RAPPYLEE BATEMAN, NAOMI BISTLINE,
27 DONNAE BARLOW, and MORETTA ROSE JOHNSON, did unlawfully seize, confine,
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1 inveigle, decoy, kidnap, abduct, and carry away Jane Does 4, 8, and 9, and held them for a
2 purpose (to wit: to take them out of Arizona Department of Child Safety custody and evade
3 law enforcement), and in committing and in furtherance of their commission of the offense,
4 the defendants did travel in and willfully transported the victims in interstate commerce
5 from Arizona to Washington, and used a means, facility, and instrumentality of interstate
6 commerce.

7 In violation of Title 18, United States Code, Sections 1201(a)(1), (b), and 2.

8 **COUNT 7**

9 Beginning at a time unknown to the grand jury, but at least on or between November
10 27, 2022 and continuing through December 1, 2022, in the District of Arizona and
11 elsewhere, the defendants, SAMUEL RAPPYLEE BATEMAN, NAOMI BISTLINE,
12 DONNAE BARLOW, and MORETTA ROSE JOHNSON, and others known and
13 unknown to the grand jury, did knowingly and intentionally combine, conspire, and agree
14 together and with each other, to unlawfully seize, confine, inveigle, decoy, kidnap, abduct,
15 and carry away Jane Does 4, 8, and 9, and held them for a purpose (to wit: to take them out
16 of Arizona Department of Child Safety custody and evade law enforcement), and in
17 committing and in furtherance of their commission of the offense, the defendants did travel
18 in and willfully transported the victims in interstate commerce from Arizona to
19 Washington, and used a means, facility, and instrumentality of interstate commerce.

20 In violation of Title 18, United States Code, Sections 1201(a)(1), (b), and (c).

21 **OVERT ACTS**

22 In furtherance of the conspiracy and to effect the objects of the conspiracy, the
23 following overt acts, among others, were committed in the District of Arizona and
24 elsewhere:

- 25 1. On or about November 27, 2022, defendants NAOMI BISTLINE
26 (“BISTLINE”), DONNAE BARLOW (“BARLOW”), and MORETTA ROSE
27 JOHNSON (“JOHNSON”) assisted eight of nine minor female victims (three of
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1 them under the age of 14) to leave the custody of the Arizona Department of Child
2 Safety (“DCS”) group homes in which they were staying pending delinquency
3 proceedings following the September 13, 2022 arrest of defendant SAMUEL
4 RAPPYLEE BATEMAN (“BATEMAN”), and their Court Authorized Removals
5 (CAR).

6 2. Specifically, BISTLINE and BARLOW picked up minor victims, Jane Does
7 7, 8 and 9, after they left DCS custody on or about November 27, 2022.

8 3. JOHNSON picked up minor victims, Jane Does 3, 4, 5, 10 and 11, after they
9 left DCS custody on or about November 27, 2022.

10 4. On the evening of November 27, 2022, BATEMAN made a recorded video
11 call from the Core Civic/Central Arizona Florence Correctional Complex
12 (“CAFC”), where he was in federal custody, to BARLOW. During the video call,
13 BARLOW was driving a vehicle and BISTLINE was the front-seat passenger.
14 BISTLINE informed BATEMAN that they had Jane Does 8 and 9, referenced by
15 code names.

16 5. On the morning of November 28, 2022, BATEMAN made a video call from
17 CAFCC to BISTLINE, who appeared to be in a hotel room. In response to
18 BATEMAN’s questioning about who was with them, BISTLINE told BATEMAN
19 that “W2” (a reference to the one of nine girls to have not escaped from CPS
20 custody) was the only one not with them, but that they had tried and ran for their
21 lives after police were called. BATEMAN told them they needed to get W2. The
22 video panned to all eight minors taken from CPS custody.

23 6. In the following days, BATEMAN made numerous video calls to BISTLINE
24 and the missing girls. At one point, Bateman asked if they were in “our state” and
25 they stated that they were not.

26 7. On November 28, 2022, BATEMAN made video calls to JOHNSON, who
27 appeared to be in a hotel room with a baby and at least one other adult wife of
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1 BATEMAN. They talked about being a long way away. JOHNSON told defendant
2 BATEMAN that “we are helping you.” BATEMAN encouraged JOHNSON to stay
3 strong.

4 8. During another call on the evening of November 28, 2022, one of
5 BATEMAN’s wives reported to BATEMAN that they had cleaned out one of the
6 vehicles and were swapping.

7 9. On December 1, 2022, JOHNSON had all eight missing girls in an Airbnb in
8 Spokane, Washington, paid for by one of BATEMAN’s followers. JOHNSON
9 refused to answer the door for a Spokane Sheriff’s Sergeant. Later, the sergeant
10 stopped JOHNSON in a vehicle, attempting to drive away with all eight missing
11 girls.

12 **FORFEITURE ALLEGATION**

13 The Grand Jury realleges and incorporates the allegations of Counts 1 through 7 of
14 this Superseding Indictment, which are incorporated by reference as though fully set forth
15 herein.

16 Pursuant to 18 U.S.C. §§ 924(d) and 981, 21 U.S.C. §§ 853 and 881, and 28 U.S.C.
17 § 2461(c), and upon conviction of the offenses alleged in Counts 1-7 of this Superseding
18 Indictment, the defendant shall forfeit to the United States of America all right, title, and
19 interest in (a) any property constituting, or derived from, any proceeds the persons
20 obtained, directly or indirectly, as the result of the offense, and (b) any of the defendant’s
21 property used, or intended to be used, in any manner or part, to commit, or to facilitate the
22 commission of, such offense as to which property the defendants is liable. If any forfeitable
23 property, as a result of any act or omission of the defendant:

- 24 (1) cannot be located upon the exercise of due diligence,
25 (2) has been transferred or sold to, or deposited with, a third party,
26 (3) has been placed beyond the jurisdiction of the court,
27 (4) has been substantially diminished in value, or
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1 (5) has been commingled with other property which cannot be divided without
2 difficulty,

3 it is the intent of the United States to seek forfeiture of any other property of said
4 defendant up to the value of the above-described forfeitable property, pursuant to 21 U.S.C.
5 § 853(p).

6 All in accordance with 18 U.S.C. §§ 924(d) and 981, 21 U.S.C. §§ 853 and 881, 28
7 U.S.C. § 2461(c), and Rule 32.2, Federal Rules of Criminal Procedure.

8
9 A TRUE BILL

10 *S/*

11 FOREPERSON OF THE GRAND JURY
Date: December 14, 2022

12 GARY M. RESTAINO
13 United States Attorney
14 District of Arizona

15 *S/*
16 _____
DIMITRA H. SAMPSON
Assistant U.S. Attorney