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CLERK U S DISTRICT COURT DISTRICT OF ARIZONA	
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,

Plaintiff,

vs.

No. CR-22-08092-PCT-SMB

**REDACTED THIRD
SUPERSEDING
INDICTMENT**

1. Samuel Rappylee Bateman,
(Counts 1-11, 13-47, 50-56)
2. Naomi Bistline,
(Counts 50-55)
3. Donnae Barlow,
(Counts 50-53),
4. Moretta Rose Johnson,
(Counts 50-53)
5. Josephine Barlow Bistline,
(Counts 11, 13, 25-29, 31-33,
57-59)
6. LaDell Jay Bistline, Jr.,
(Counts 12, 13, 27-29, 31-33)
7. Brenda Barlow,
(Counts 13, 41-45, 48, 50-53)
8. Marona Johnson,
(Count 13, 49)

- VIO: 18 U.S.C. § 371
(Conspiracy to Commit Persuasion
and Coercion)
Count 1
- 18 U.S.C. § 2423(e)
(Conspiracy to Commit
Transportation of a Minor for
Criminal Sexual Activity)
Count 2
- 18 U.S.C. § 2423(e)
(Conspiracy to Commit Interstate
Travel with the Intent to Engage in
Illicit Sexual Conduct with a Minor)
Count 3
- 18 U.S.C. §§ 2422(a) and 2
(Persuading or Coercing Travel to
Engage in Sexual Activity,
Aid and Abet)
Counts 4, 7, 14, 18, 21, 27, 31, 34

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- 9. Leia Bistline,
(Counts 25, 26)
- 10. Torrance Bistline, and
(Counts 26, 42-45, 49)
- 11. Leilani Barlow,
(Counts 34-36)

Defendants.

18 U.S.C. §§ 2422(b) and 2
(Using a Means of Interstate
Commerce to Persuade or Coerce a
Minor to Engage in Sexual Activity,
Aid and Abet)
Counts 5, 8, 15, 19, 22, 25, 26, 28,
32, 35

18 U.S.C. §§ 2423(a) and 2
(Transportation of a Minor for
Criminal Sexual Activity,
Aid and Abet)
Counts 6, 9, 10, 16, 17, 20, 23, 29,
30, 33, 36, 37, 38, 40, 41

18 U.S.C. §§ 2251(a), (e), 2256,
and 2
(Production of Child Pornography,
Attempt and Aid and Abet)
Count 11

18 U.S.C. §§ 2252(a)(2), (b)(1),
and 2256
(Receipt of Child Pornography)
Count 12

18 U.S.C. §§ 1470 and 2
(Transfer of Obscene Material to a
Minor, Aid and Abet)
Count 13

18 U.S.C. §§ 2423(b) and 2
(Interstate Travel with Intent to
Engage in Illicit Sexual Conduct
with a Minor, Aid and Abet)
Counts 24, 39

18 U.S.C. §§ 1512(c)(1) and 2
(Destruction of Records in an
Official Proceeding, Aid and
Abet)
Counts 42, 48, 49

18 U.S.C. § 1512(k)
(Conspiracy to Commit Destruction
of Records in an Official
Proceeding)
Count 43

18 U.S.C. §§ 1512(c)(2) and 2
(Tampering with an Official
Proceeding, Aid and Abet)
Counts 44, 50, 54, 59

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18 U.S.C. § 1512(k)
(Conspiracy to Commit Tampering
with an Official Proceeding)
Counts 45, 51, 55

18 U.S.C. §§ 1519 and 2
(Destruction of Records in a Federal
Investigation, Aid and Abet)
Count 46

18 U.S.C. §§ 1512(b)(1) and 2
(Tampering with a Witness,
Aid and Abet)
Counts 47, 56

18 U.S.C. §§ 1201(a)(1), (b), and 2
(Kidnapping, Aid and Abet)
Count 52

18 U.S.C. § 1201(c)
(Conspiracy to Commit Kidnapping)
Count 53

18 U.S.C. § 875(c)
(Interstate Threats)
Count 57

18 U.S.C. §§ 2261A(2) and 2261(b)
(Cyberstalking)
Count 58

18 U.S.C. §§ 981, 2253, and 2428;
21 U.S.C. § 853; and
28 U.S.C. § 2461(c)
(Forfeiture Allegation)

THE GRAND JURY CHARGES:

INTRODUCTION

1. Beginning in 2019 or earlier, defendant SAMUEL RAPPYLEE BATEMAN proclaimed himself to be the Prophet of the Fundamentalist Church of Jesus Christ of Latter-Day Saints (“FLDS”), a subset of the fundamentalist Mormon denominations whose members practice polygamy.

2. The FLDS church traces its origins to the 1950s in the Short Creek Community (now the twin cities of Hildale, Utah, and Colorado City, Arizona). Colorado

1 City has a population of approximately 2,500 people as of the 2020 census, and is just over
2 9 square miles.

3 3. Defendant SAMUEL RAPPYLEE BATEMAN proclaimed himself to be the
4 successor of Warren Jeffs, the former leader of the FLDS who is known to his followers as
5 “Uncle Warren.” Jeffs was reported to have up to 78 wives, including minors. Jeffs is
6 currently serving a life sentence for sexually assaulting some of his underage wives.

7 4. In 2019 and 2020, defendant SAMUEL RAPPYLEE BATEMAN began
8 taking female adults and children from his male followers and proclaiming them to be his
9 “wives.” Defendant BATEMAN amassed over 20 wives, including minor girls as young
10 as 9 years old. None of these “marriages” were legally recognized.

11 5. At times relevant to this Third Superseding Indictment, defendant SAMUEL
12 RAPPYLEE BATEMAN had followers residing in Lincoln, Nebraska; Cedar City, Utah;
13 Monument, Colorado; and Colorado City, Arizona. He traveled to and between these
14 locations to increase his following and claim wives, 10 of whom were under the age of 18.
15 His intent was to engage in sexual activity with minor girls, and he did so on a regular
16 basis. By March 2021, defendant BATEMAN had moved his followers to Colorado City,
17 Arizona, where he resided with his wives until September 13, 2022.

18 **COUNT 1**

19 6. The allegations contained in paragraphs 1 through 5 are realleged and
20 incorporated herein as if fully set forth in this paragraph.

21 7. Beginning at a time unknown, but at least from on or about September 4,
22 2019 through on or about September 13, 2022, in the District of Arizona and elsewhere,
23 defendant SAMUEL RAPPYLEE BATEMAN, and others known and unknown to the
24 grand jury, did knowingly and willfully conspire and agree together and with each other,
25 to commit the following offenses against the United States: Persuasion and Coercion, in
26 violation of Title 18, United States Code, Sections 2422(a) and (b), as alleged in Counts 4,
27 5, 7, 8, 14, 15, 18, 19, 21, 22, 25, 26, 27, 28, 31, 32, 34, and 35.

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1 **Objects of the Conspiracy**

2 8. The objects of the conspiracy were that defendant SAMUEL RAPPYLEE
3 BATEMAN and his co-conspirators would: 1) knowingly persuade, induce, entice, and
4 coerce any individual to travel in interstate commerce to engage in sexual activity for which
5 any person can be charged with a criminal offense; and 2) use a facility and means of
6 interstate commerce to knowingly persuade, induce, entice, and coerce any individual who
7 had not attained the age of 18 years to engage in sexual activity for which any person can
8 be charged with a criminal offense.

9 **Manner and Means of the Conspiracy**

10 9. Defendant SAMUEL RAPPYLEE BATEMAN convinced some of his early
11 followers and co-conspirators that he was the Prophet. Defendant BATEMAN claimed to
12 have “impressions of Heavenly Father’s will” (referencing God) to encourage his followers
13 to submit to defendant BATEMAN’s will.

14 10. With his co-conspirators, defendant SAMUEL RAPPYLEE BATEMAN
15 continued to recruit followers, many of whom became his wives. As part of his recruitment
16 efforts, defendant BATEMAN traveled alone and with his co-conspirators between
17 Arizona and other states to visit and teach his potential followers.

18 11. Defendant SAMUEL RAPPYLEE BATEMAN’s followers and co-
19 conspirators would then “bear testimony” to other potential followers to convince them
20 that defendant BATEMAN was the Prophet and doing “Uncle Warren’s” will. Through
21 this process, defendant BATEMAN began taking adult wives. Defendant BATEMAN also
22 convinced his followers and co-conspirators to give their children as wives, 10 of whom
23 were under the age of 18.

24 12. There were no legal or formal ceremonies to commemorate “marriage,” but
25 marriage signified the beginning of defendant SAMUEL RAPPYLEE BATEMAN’s
26 sexual relationship with each of his wives. Upon marriage, defendant BATEMAN engaged
27 in sexual intercourse with his adult wives and impregnated several of them. Defendant
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1 BATEMAN usually initiated physical contact with his minor wives by hugging, kissing,
2 and sleeping with them in the same bed, before ultimately engaging in sexual intercourse
3 with them.

4 13. Defendant SAMUEL RAPPYLEE BATEMAN originally resided in
5 Colorado City, Arizona. Traveling between Arizona, Nebraska, Colorado, and Utah,
6 defendant BATEMAN and his co-conspirators began bringing his wives, including minors,
7 back to Colorado City, Arizona. Defendant BATEMAN and his co-conspirators used
8 cellular phones, other electronic devices, electronic communications, the Internet, vehicles,
9 interstate highways, and hotels to induce, persuade, and encourage the minor victims to
10 marry him, travel with and to him, and to engage in sexual activity.

11 14. As part of the conspiracy, defendant SAMUEL RAPPYLEE BATEMAN
12 and his co-conspirators engaged in sexual activity in the presence of minors. Defendant
13 BATEMAN and his co-conspirators encouraged the minors to participate in the sexual
14 activity and trained them to do so. In one instance, defendant BATEMAN and his co-
15 conspirators engaged in a group sexual activity involving minors, using electronic devices
16 and video communication to facilitate the participation of other co-conspirators and a
17 minor in different states.

18 15. Defendant SAMUEL RAPPYLEE BATEMAN controlled his followers by
19 insisting they “bear testimony” and make “confessions.” He also “rebuked” them and
20 provided “corrections” when his followers were not obedient to his will. Defendant
21 BATEMAN, his co-conspirators, and many of his followers documented their travel and
22 daily activities in journals, day-planners, and other records.

23 **Overt Acts**

24 16. In furtherance of the conspiracy, and to effect the objects of the conspiracy,
25 the following overt acts, among others, were committed in the District of Arizona and
26 elsewhere:

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1 17. On or about September 4, 2019, defendant SAMUEL RAPPYLEE
2 BATEMAN traveled from Colorado City, Arizona, to Rifle, Colorado, to take the first of
3 M.J.'s adult daughters, defendant MARONA JOHNSON, as a wife. Defendant
4 BATEMAN took defendant MARONA JOHNSON back to Colorado City, Arizona, where
5 he later impregnated her.

6 18. On or about October 26, 2019, after a trip from Colorado City, Arizona, to
7 Lincoln, Nebraska, defendant SAMUEL RAPPYLEE BATEMAN took the second of
8 M.J.'s adult daughters, Individual 1, as a wife. Defendant BATEMAN took Individual 1
9 back to Colorado City, Arizona, where he later impregnated her.

10 19. On or about March 26, 2020, defendant SAMUEL RAPPYLEE BATEMAN
11 spoke to M.J. and told him that God gave M.J.'s daughter, Jane Doe 6 (then age 9), to
12 defendant BATEMAN. M.J. responded saying he knew defendant BATEMAN was going
13 to say that.

14 20. On or between April 17 and April 18, 2020, defendant SAMUEL
15 RAPPYLEE BATEMAN traveled with his wives from Colorado City, Arizona, to Lincoln,
16 Nebraska.

17 21. When defendant SAMUEL RAPPYLEE BATEMAN arrived in Lincoln,
18 Nebraska, he started calling Jane Doe 6 "Mother [Jane Doe 6]."

19 22. On or about May 3, 2020, at a hospital in Omaha, Nebraska, defendant
20 SAMUEL RAPPYLEE BATEMAN "rebuked" M.J. in front of his family and told him
21 that Jane Doe 6 belonged to defendant BATEMAN.

22 23. After leaving the hospital, M.J. traveled from Omaha, Nebraska, to Lincoln,
23 Nebraska, and encouraged his daughter, Jane Doe 6, while they sat in a vehicle, to marry
24 defendant SAMUEL RAPPYLEE BATEMAN, by telling her that the Lord had something
25 for her to do, and to pray about it.

26 24. On or between May 3 and May 4, 2020, defendant SAMUEL RAPPYLEE
27 BATEMAN, Jane Doe 6, and M.J. sat in a van together. Defendant BATEMAN had Jane
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1 Doe 6 sit on his lap and he kissed her on the lips. Later, M.J.'s family was told Jane Doe
2 6 was going with defendant BATEMAN.

3 25. On or about May 4, 2020, defendant SAMUEL RAPPYLEE BATEMAN
4 took Jane Doe 6 (then age 9) as a wife.

5 26. On or between May 3 and May 5, 2020, defendant SAMUEL RAPPYLEE
6 BATEMAN told M.J. he would be blessed for his loyalty.

7 27. On or between May 3 and May 8, 2020, defendant SAMUEL RAPPYLEE
8 BATEMAN took Jane Doe 6 by motor vehicle from Lincoln, Nebraska, to Colorado City,
9 Arizona.

10 28. On or about May 8, 2020, defendant SAMUEL RAPPYLEE BATEMAN
11 took Jane Doe 6 to St. George, Utah, and had her lay on his lap as he drove.

12 29. On or about May 15, 2020, defendant SAMUEL RAPPYLEE BATEMAN
13 took Jane Doe 6 for a walk to the airport, and they stopped and prayed. They discussed that
14 "the Devil doesn't like what we are doing."

15 30. On or about May 16, 2020, defendant SAMUEL RAPPYLEE BATEMAN
16 took Jane Doe 6 for a walk, and they knelt and prayed.

17 31. As described by Jane Doe 6, after taking her away from her mother to
18 Colorado City, Arizona, defendant SAMUEL RAPPYLEE BATEMAN took Jane Doe 6
19 for a hike, told her what female and male private parts were called, and explained how
20 babies were made. On the drive, defendant BATEMAN touched Jane Doe 6's private parts
21 "down there" while her clothes were on.

22 32. On or between May 19 and June 30, 2020, defendant SAMUEL RAPPYLEE
23 BATEMAN had a video call with his daughter, Jane Doe 1, showed her Jane Doe 6, and
24 introduced Jane Doe 6 as Jane Doe 1's "new mother." Defendant BATEMAN told Jane
25 Doe 1 that Jane Doe 6 was 9 years old and that he "married" Jane Doe 6 "in full consent
26 of her father."
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1 33. A few days later, defendant SAMUEL RAPPYLEE BATEMAN had another
2 video call with his daughter, Jane Doe 1, during which he hugged and kissed Jane Doe 6.

3 34. On or about June 4, 2020, as recorded by defendant SAMUEL RAPPYLEE
4 BATEMAN, he chastened Jane Doe 6 “quite hard today because she wouldn’t obey
5 quickly, lingered and lingered until something had to change. After a while, she came
6 weeping and confessing.”

7 35. On or between June 6 and June 7, 2020, defendant SAMUEL RAPPYLEE
8 BATEMAN traveled with Jane Doe 6 from Colorado City, Arizona, to Lincoln, Nebraska.

9 36. In Lincoln, Nebraska, at the hotel where they were staying, defendant
10 SAMUEL RAPPYLEE BATEMAN took off his clothes as well as Jane Doe 6’s clothes.
11 Defendant BATEMAN touched Jane Doe 6’s “private parts” and put his finger inside her
12 “private part.” Defendant BATEMAN also had Jane Doe 6 touch his “private part.”
13 Defendant BATEMAN made Jane Doe 6 move his penis back and forth until a white liquid
14 came out of it.

15 37. Starting in Lincoln, Nebraska, and up until the time Jane Doe 6 got her
16 period, defendant SAMUEL RAPPYLEE BATEMAN put his penis in Jane Doe 6’s
17 “butthole” rather than in her vagina.

18 38. On or about June 20, 2020, as recorded by defendant SAMUEL RAPPYLEE
19 BATEMAN, M.J. had been “laboring” with defendant MORETTA ROSE JOHNSON
20 (then age 17), and she voiced “she wants to do Heavenly Father’s will and asked her father
21 [M.J.] to help her.”

22 39. On or about June 28, 2020, defendant SAMUEL RAPPYLEE BATEMAN
23 returned from Lincoln, Nebraska, to Colorado City, Arizona, with Jane Doe 6.

24 40. On or about June 28, 2020, defendant SAMUEL RAPPYLEE BATEMAN
25 told Individual 1 he did not want to see Individual 2 (defendant MORETTA ROSE
26 JOHNSON’s mother) or defendant MORETTA ROSE JOHNSON.

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1 41. On or about June 30, 2020, defendant SAMUEL RAPPYLEE BATEMAN
2 sent a lengthy email to M.J. stating in relevant part: “[m]y heart is offended greatly at
3 [Individual 2] and [defendant MORETTA ROSE JOHNSON] for thinking evil of me,
4 thinking I am doing my own thing. They need an example and don’t have one. . . God is
5 so offended at you for the way you have trampled over top of me that He gave me
6 [defendant BRENDA BARLOW] and [defendant DONNAE BARLOW] . . . You can all
7 reject it if you want, see if I care. Your children will fall by the dozens unless you repent
8 in sackcloth and ashes.”

9 42. On or about July 1, 2020, defendant SAMUEL RAPPYLEE BATEMAN
10 wrote in his journal, “God seems to whisper ‘[Jane Doe 3]’” (referring to Jane Doe 3, then
11 age 14).

12 43. On or about July 2, 2020, M.J. told defendant SAMUEL RAPPYLEE
13 BATEMAN that “the Lord” told M.J. to give defendant BATEMAN his Toyota van.

14 44. On or about July 4, 2020, defendant SAMUEL RAPPYLEE BATEMAN
15 took defendant MORETTA ROSE JOHNSON (then age 17) as a wife.

16 45. On or about July 4, 2020, defendants BRENDA BARLOW, DONNAE
17 BARLOW, and MORETTA ROSE JOHNSON traveled in M.J.’s Toyota van from
18 Lincoln, Nebraska, to Colorado City, Arizona, to be with defendant SAMUEL
19 RAPPYLEE BATEMAN.

20 46. On or between July 3 and July 4, 2020, defendant SAMUEL RAPPYLEE
21 BATEMAN slept in the same bed with Jane Doe 6 and complained that she wet the bed.

22 47. On or about July 5, 2020, defendant SAMUEL RAPPYLEE BATEMAN
23 introduced his 6 wives, including Jane Doe 6, to his former wife, L.B.2. He also introduced
24 them to defendant LADELL JAY BISTLINE, JR.

25 48. When, on or about July 13, 2020, Arizona Department of Child Safety
26 (hereinafter “AZ DCS”) personnel visited defendant SAMUEL RAPPYLEE BATEMAN’s
27 home, defendant BATEMAN initially refused to allow them inside. Defendant
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1 BATEMAN was also present when AZ DCS personnel spoke to Jane Doe 6, and he
2 gestured to her whether or not to answer their questions.

3 49. On or about July 14, 2020, AZ DCS contacted Jane Doe 6's mother,
4 Individual 3, who was still residing in Lincoln, Nebraska. Individual 3 justified Jane Doe
5 6 living with defendant SAMUEL RAPPYLEE BATEMAN in Colorado City, Arizona, by
6 saying Jane Doe 6 (still 9 years of age) was helping care for her sister's baby.

7 50. On or about July 14, 2020, defendant SAMUEL RAPPYLEE BATEMAN
8 took his 6 wives, including Jane Doe 6, to Jan's Canyon, Utah, where, as recorded by
9 defendant BATEMAN, they had "an amazing experience and lesson that they will
10 remember forever!"

11 51. On or about August 8, 2020, defendant SAMUEL RAPPYLEE BATEMAN
12 traveled to Cedar City, Utah, to meet defendants LADELL JAY BISTLINE, JR. and
13 JOSEPHINE BARLOW BISTLINE and their 3 children, including Jane Doe 8 (then age
14 9) and Jane Doe 9 (then age 10). They all traveled from Cedar City, Utah, to Lincoln,
15 Nebraska.

16 52. On or about August 10, 2020, defendant SAMUEL RAPPYLEE BATEMAN
17 conducted training on "the Prayer pamphlet" to M.J.'s family, defendants LADELL JAY
18 BISTLINE, JR. and JOSEPHINE BARLOW BISTLINE, and their 3 children, including
19 Jane Doe 8 and Jane Doe 9.

20 53. On or about August 13, 2020, M.J. told his daughter, Jane Doe 3 (then age
21 14), to say her prayers and then he asked her, "Do you know where you belong?"

22 54. On or about August 13, 2020, defendant SAMUEL RAPPYLEE BATEMAN
23 met with Jane Doe 3 and listened to her "testimony" of "Uncle Warren coming to her."
24 They went for a walk and held hands, and defendant BATEMAN asked Jane Doe 3 if she
25 felt this was right.

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1 55. On or between August 13 and August 14, 2020, defendant SAMUEL
2 RAPPYLEE BATEMAN took Jane Doe 3 (then age 14) as a wife, and she went to live
3 with him and his other wives at an AirBnB in Lincoln, Nebraska.

4 56. On or about August 17, 2020, defendant SAMUEL RAPPYLEE BATEMAN
5 told M.J. that God told him that M.J.'s daughter, Jane Doe 5 (then age 13), belonged to
6 defendant BATEMAN.

7 57. On or between August 17 and August 18, 2020, M.J. asked Jane Doe 5, "Do
8 you believe me when I say you belong in Samuel's family?"

9 58. On or about August 18, 2020, M.J. told defendant SAMUEL RAPPYLEE
10 BATEMAN that Jane Doe 5 was ready whenever defendant BATEMAN was.

11 59. On or about August 18, 2020, defendant SAMUEL RAPPYLEE
12 BATEMAN, M.J., and Jane Doe 5 (then age 13), got in defendant BATEMAN's car, and
13 defendant BATEMAN took Jane Doe 5 as a wife.

14 60. On or about August 18, 2020, defendant SAMUEL RAPPYLEE BATEMAN
15 told Jane Doe 5 to get her things and took her to the AirBnB where he was staying in
16 Lincoln, Nebraska.

17 61. On or about August 19, 2020, defendant SAMUEL RAPPYLEE BATEMAN
18 asked Jane Doe 5 to sleep with him and explained sex to her.

19 62. On or between August 19, 2020 and March 18, 2021, in Lincoln, Nebraska,
20 defendant SAMUEL RAPPYLEE BATEMAN had anal sex with Jane Doe 5 for the first
21 time before she got her period so that he would not get her pregnant.

22 63. On or between August 22 and August 23, 2020, as recorded by defendant
23 SAMUEL RAPPYLEE BATEMAN, he "slept with Angel Mother [Jane Doe 3] tonight!"

24 64. On or about September 5, 2020, defendant SAMUEL RAPPYLEE
25 BATEMAN and M.J. agreed that defendant BATEMAN would move into M.J.'s house in
26 Lincoln, Nebraska, with all his wives and take M.J.'s bedroom.

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1 65. In September 2020, Jane Doe 3 and Jane Doe 5 said they wanted to be single
2 again. On or about September 25, 2020, Jane Doe 5 was summoned to defendant SAMUEL
3 RAPPYLEE BATEMAN's bedroom, and Jane Doe 3 was already there. Defendant
4 BATEMAN told them he heard they wanted to be single, and that they could be if they
5 wanted to, but that they would "go to Hell for not wanting this." Defendant BATEMAN
6 called them "adulterous" and said he would rather kiss a snake on the lips than touch them.
7 As recorded by defendant SAMUEL RAPPYLEE BATEMAN, he "got after" Jane Doe 3
8 and Jane Doe 5 "quite firmly for saying they wanted to be single again," until they both
9 confessed to his satisfaction.

10 66. On or about September 27, 2020, as recorded by defendant SAMUEL
11 RAPPYLEE BATEMAN, he told M.J. that God told defendant BATEMAN that M.J.'s
12 daughter, Jane Doe 4 (then age 10), "should be by my side."

13 67. On or about September 29, 2020, defendant SAMUEL RAPPYLEE
14 BATEMAN took Jane Doe 4 (then age 10) as a wife.

15 68. On or about September 29, 2020, defendant SAMUEL RAPPYLEE
16 BATEMAN drove with M.J., Individual 2, and their daughter Jane Doe 4, and defendant
17 BATEMAN kissed Jane Doe 4.

18 69. On or between September 29, 2020 and January 31, 2021, defendant
19 SAMUEL RAPPYLEE BATEMAN was "intimate" with someone else in front of Jane
20 Doe 4 (then age 10 or 11).

21 70. On or between September 29, 2020 and January 31, 2021, in M.J.'s bedroom
22 that had been given to defendant SAMUEL RAPPYLEE BATEMAN, defendant
23 BATEMAN was first "intimate" with Jane Doe 4 in an encounter she described as
24 "definitely terrifying." There was another girl present.

25 71. On or between September 29, 2020 and March 18, 2021, defendant
26 SAMUEL RAPPYLEE BATEMAN touched Jane Doe 4's (then age 10 or 11) breasts, in
27 front of her mother, Individual 2, in a motor vehicle.

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1 72. On or about October 24, 2020, in Omaha, Nebraska, M.J. took Jane Doe 7
2 (then age 11) for a drive and asked if she was having bad feelings against defendant
3 SAMUEL RAPPYLEE BATEMAN because she thought she had to marry him. When
4 Jane Doe 7 confirmed this, M.J. assured her not to fear because she was not going to marry
5 defendant BATEMAN. M.J. told Jane Doe 7 that defendant BATEMAN was a Prophet
6 and she should pray for forgiveness and not hold bad feelings against defendant
7 BATEMAN anymore.

8 73. On or about October 25, 2020, as recorded by Jane Doe 7, defendant
9 SAMUEL RAPPYLEE BATEMAN sent text messages about Jane Doe 7 to his wife,
10 Individual 1, during Sunday School. Individual 1 showed Jane Doe 7 the messages, which
11 included “show [Jane Doe 7] this text” and “I see [Jane Doe 7] has made a great effort of
12 improvement.”

13 74. On or about October 29, 2020, defendant SAMUEL RAPPYLEE
14 BATEMAN took M.J.’s wife, Individual 3, mother of Jane Doe 5 and Jane Doe 6, as a
15 wife.

16 75. On or about October 29, 2020, as recorded by defendant SAMUEL
17 RAPPYLEE BATEMAN, he “rebuked” one of M.J.’s sons in front of others and told him
18 that “if he stood up to harm me I would throw him through the wall. And that he had lost
19 an eternal blessing in [Jane Doe 7]. God was going to give her to him but he spit in The
20 Lord’s face so He gave her to me.”

21 76. On or about October 29, 2020, defendant SAMUEL RAPPYLEE
22 BATEMAN took Jane Doe 7 (then age 11) as a wife.

23 77. On or about October 29, 2020, as recorded by defendant SAMUEL
24 RAPPYLEE BATEMAN, he took Jane Doe 7 from Lincoln, Nebraska, to Omaha,
25 Nebraska, and “rebuked her strongly” when she would not speak. Defendant BATEMAN
26 told Jane Doe 7 if she didn’t “want this I would take her back this instant. She repented
27 quickly.”
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1 78. On or between October 29, 2020 and January 15, 2021, in Lincoln, Nebraska,
2 defendant SAMUEL RAPPYLEE BATEMAN was “intimate” with Jane Doe 7 (then age
3 11 or 12).

4 79. On or about October 31, 2020, as recorded by defendant SAMUEL
5 RAPPYLEE BATEMAN, he gave defendant BRENDA BARLOW “sacred ordinance
6 training,” the same training received by defendant MARONA JOHNSON “many months
7 ago.”

8 80. On or about November 7, 2020, defendants JOSEPHINE BARLOW
9 BISTLINE and NAOMI BISTLINE married defendant SAMUEL RAPPYLEE
10 BATEMAN.

11 81. On or about November 7, 2020, defendant LADELL JAY BISTLINE, JR.
12 spoke to defendant SAMUEL RAPPYLEE BATEMAN on the phone and told defendant
13 BATEMAN that “The Spirit” told defendant BISTLINE, JR. that he would be “sealed” to
14 defendant BATEMAN.

15 82. On or about November 7, 2020, after defendant SAMUEL RAPPYLEE
16 BATEMAN spoke with defendant LADELL JAY BISTLINE, JR. on the phone, M.J. told
17 defendant BATEMAN that God told M.J. he belonged to defendant BATEMAN as well.

18 83. On or about November 7, 2020, defendant SAMUEL RAPPYLEE
19 BATEMAN called defendants BRENDA BARLOW and MARONA JOHNSON, and M.J.
20 called his wife, Individual 2, and they all met at a hotel room. Defendant BATEMAN
21 directed everyone to be naked and told M.J. and Individual 2 to perform sex acts in front
22 of defendants BRENDA BARLOW and MARONA JOHNSON so that they could learn
23 how to sexually please defendant BATEMAN.

24 84. On or between November 7 and November 11, 2020, defendant SAMUEL
25 RAPPYLEE BATEMAN called Jane Doe 5 and asked her to be part of something special.
26 He said it would be necessary to get to the celestial kingdom.

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1 85. On or between November 7 and November 11, 2020, defendant SAMUEL
2 RAPPYLEE BATEMAN coordinated a “sacred ordinance” to emulate the “Washing of the
3 Feet” in a hotel room in Lincoln, Nebraska. Defendant BATEMAN told everyone to be
4 naked, washed the feet of M.J. and defendant LADELL JAY BISTLINE, Jr., and then
5 claimed he needed to have sex with M.J. to bond with him. When defendant BATEMAN
6 had difficulty getting an erection, he demanded the women and girls assist him by touching
7 him. Defendants BRENDA BARLOW and DONNAE BARLOW were there participating,
8 as well as some of the minor wives. When defendant BATEMAN was unable to have sex
9 with M.J., he had sex with defendant MORETTA ROSE JOHNSON (then age 17), and he
10 told M.J. to have sex with his wife, Individual 2. Defendant BATEMAN also put his finger
11 inside Jane Doe 5’s (then age 13) vagina and moved it around.

12 86. On or about November 11, 2020, defendants LADELL JAY BISTLINE, JR.
13 and JOSEPHINE BARLOW BISTLINE visited Individual 4, mother of Jane Doe 10, in
14 Monument, Colorado, and tried to convince her that defendant SAMUEL RAPPYLEE
15 BATEMAN was doing the will of Warren Jeffs. Defendant BATEMAN then called, and
16 Individual 4 listened to defendant BATEMAN’s “testimony” that day.

17 87. On or about November 14, 2020, defendants LADELL JAY BISTLINE, JR.
18 and JOSEPHINE BARLOW BISTLINE traveled to Utah and purchased a white Yukon for
19 defendant SAMUEL RAPPYLEE BATEMAN.

20 88. On or about November 15, 2020, defendant LEILANI BARLOW allowed
21 her daughter, Jane Doe 11 (then age 14), to listen to defendant SAMUEL RAPPYLEE
22 BATEMAN’s teachings.

23 89. On or between November 17 and November 19, 2020, Individual 4 sent an
24 electronic communication to her sisters stating that defendant SAMUEL RAPPYLEE
25 BATEMAN is doing “Uncle Warren[’]s will.”

26 90. On or about November 20, 2020, defendants SAMUEL RAPPYLEE
27 BATEMAN and NAOMI BISTLINE left Lincoln, Nebraska, with Jane Doe 3 and others.

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1 91. On or about November 21, 2020, defendant SAMUEL RAPPYLEE
2 BATEMAN and his wives stopped in Monument, Colorado, to provide lessons to the
3 Bistline family, including Jane Doe 11.

4 92. On or about November 23, 2020, defendant LADELL JAY BISTLINE, JR.
5 told a law enforcement officer it was just a rumor that defendant SAMUEL RAPPYLEE
6 BATEMAN married his daughter, Jane Doe 9. During this interaction, defendant
7 BATEMAN's wives were hiding.

8 93. On or about November 23, 2020, in the evening, in Colorado City, Arizona,
9 defendant SAMUEL RAPPYLEE BATEMAN gave Jane Doe 3, and some of his other
10 wives, to defendant LADELL JAY BISTLINE, JR. to comfort him since defendant
11 BATEMAN had taken defendant BISTLINE, JR.'s wife. Defendant BATEMAN also
12 called some of his wives who were in Lincoln, Nebraska, to tell them what he had done.
13 Within hours, defendant BATEMAN sent his followers a group text message taking back
14 all of his wives.

15 94. On or about November 24, 2020, defendants SAMUEL RAPPYLEE
16 BATEMAN, NAOMI BISTLINE, and JOSEPHINE BARLOW BISTLINE, took
17 defendant BARLOW BISTLINE's daughters, Jane Doe 8 (then age 9) and Jane Doe 9 (then
18 age 10), along with defendant MORETTA ROSE JOHNSON (then age 17) and Jane Doe
19 3 (then age 14), to Cedar City, Utah, where they were stopped by law enforcement.

20 95. On or about November 24, 2020, LADELL JAY BISTLINE, JR. told law
21 enforcement that he approved of his daughters, Jane Doe 8 and Jane Doe 9, traveling with
22 defendants SAMUEL RAPPYLEE BATEMAN and JOSEPHINE BARLOW BISTLINE,
23 and that defendants BARLOW BISTLINE and BATEMAN were not married.

24 96. On or about November 24, 2020, as recorded by Jane Doe 8, after the law
25 enforcement contact, and when they returned to Colorado City, Arizona, defendant
26 SAMUEL RAPPYLEE BATEMAN held Jane Doe 8's hand and said, "did you know that
27 you belong to me?"
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1 97. On or between November 24, 2020 and August 27, 2022, defendant
2 SAMUEL RAPPYLEE BATEMAN took Jane Doe 8 (then age 9 or 10) as a wife.

3 98. On or about November 24, 2020, after returning to Colorado City, Arizona,
4 defendant SAMUEL RAPPYLEE BATEMAN told defendant NAOMI BISTLINE,
5 Individual 5, and Jane Doe 3 to comfort defendant LADELL JAY BISTLINE, JR. in a
6 vehicle.

7 99. On or between November 25 and November 27, 2020, defendant SAMUEL
8 RAPPYLEE BATEMAN coordinated group sexual activity in a hotel room in Utah or
9 Colorado, with some individuals participating via video call. Defendant BATEMAN told
10 M.J. to have anal sex with defendant JOSEPHINE BARLOW BISTLINE while defendant
11 BATEMAN had sex with Individual 5, who was M.J.'s wife. Defendants NAOMI
12 BISTLINE, MORETTA ROSE JOHNSON (then age 17) and Jane Doe 3 (then age 14)
13 were also present and naked. M.J. initiated a video call with his wives Individual 2 and
14 Individual 6. Defendant BATEMAN initiated a video call with defendants MARONA
15 JOHNSON and BRENDA BARLOW, and Jane Doe 6 (then age 10) also participated in
16 the video call. Defendant BATEMAN also initiated a video call with defendant LADELL
17 JAY BISTLINE, JR., who was in Colorado City, Arizona. Defendant BATEMAN told
18 everyone to be undressed so they could be part of it. The video participants, including Jane
19 Doe 6, were naked. Individual 5 taught Jane Doe 3 and defendants NAOMI BISTLINE
20 and MORETTA ROSE JOHNSON to "bless" defendant SAMUEL RAPPYLEE
21 BATEMAN and prepare him for sex.

22 100. On or between November 21 and November 28, 2020, defendant SAMUEL
23 RAPPYLEE BATEMAN sent an email to defendant LEIA BISTLINE saying God told
24 him she had something to tell him.

25 101. On or about November 28, 2020, defendant SAMUEL RAPPYLEE
26 BATEMAN sent a group text message informing everyone that defendant LEIA
27 BISTLINE said God told her she belonged in defendant BATEMAN's family.

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1 102. On or between December 3 and December 6, 2020, defendant SAMUEL
2 RAPPYLEE BATEMAN picked up defendant LEIA BISTLINE from Monument,
3 Colorado, to take her back to Lincoln, Nebraska.

4 103. On or about December 5, 2020, defendant SAMUEL RAPPYLEE
5 BATEMAN took defendant LEIA BISTLINE as a wife.

6 104. On or about December 9, 2020, defendant LEILANI BARLOW brought her
7 daughter, Jane Doe 11, from Monument, Colorado, to Colorado City, Arizona, and met
8 with defendant JOSEPHINE BARLOW BISTLINE.

9 105. On or between December 20, 2020 and January 1, 2021, defendant SAMUEL
10 RAPPYLEE BATEMAN coordinated another group sexual activity in a hotel in Lincoln,
11 Nebraska. M.J., Individual 2, Individual 5, Individual 7, and defendants DONNAE
12 BARLOW, LADELL JAY BISTLINE, JR., MARONA JOHNSON, and BRENDA
13 BARLOW were present, as well as some of the minor wives. Defendant BATEMAN
14 brought wine and told everyone to be naked. Defendant BATEMAN had sex with M.J.,
15 while the women and girls assisted defendant BATEMAN in getting an erection.

16 106. On or about December 21, 2020, defendant SAMUEL RAPPYLEE
17 BATEMAN told M.B.2 (then age 18) she would be banished from eternal salvation if she
18 would not follow him.

19 107. On or about December 25, 2020, defendant SAMUEL RAPPYLEE
20 BATEMAN touched Jane Doe 3's (then age 14) vagina in Lincoln, Nebraska, while they
21 were both undressed, in her father M.J.'s bedroom that he gave to defendant BATEMAN.
22 Defendant BATEMAN also wanted Jane Doe 3 to touch his penis, so she did.

23 108. In mid-December 2020, defendant SAMUEL RAPPYLEE BATEMAN
24 began pressuring Jane Doe 5 to have sex with him, asking her if she was "ready to do this."

25 109. On or about December 31, 2020, in Lincoln, Nebraska, defendant SAMUEL
26 RAPPYLEE BATEMAN told Jane Doe 5 (then age 13) that God was displeased with her
27 because of her fear of having sex, and that she needed to get over it. He asked her to sleep
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1 with him, told her to take her clothes off, got on top of her, and “pushed” his penis into her
2 vagina, causing her to bleed.

3 110. On or between December 31, 2020 and January 1, 2021, defendant SAMUEL
4 RAPPYLEE BATEMAN “rebuked” his wives and told them to factory reset their phones.

5 111. On or between January 1, 2021 and September 12, 2022, defendant
6 SAMUEL RAPPYLEE BATEMAN was “intimate” with Jane Doe 7 (then age 12 or 13)
7 in Colorado City, Arizona.

8 112. In about January 2021, defendant SAMUEL RAPPYLEE BATEMAN
9 started moving his wives from Lincoln, Nebraska, to Colorado City, Arizona.

10 113. On or about January 15, 2021, defendants SAMUEL RAPPYLEE
11 BATEMAN and JOSEPHINE BARLOW BISTLINE transported Jane Doe 5, Jane Doe 7,
12 and Jane Doe 4 by motor vehicle from Lincoln, Nebraska, and arrived in Colorado City,
13 Arizona, on January 16, 2021.

14 114. On or about January 18, 2021, defendant SAMUEL RAPPYLEE
15 BATEMAN, with some of his wives and followers, traveled to Lincoln, Nebraska, from
16 Colorado City, Arizona.

17 115. On or between January 1 and March 1, 2021, Individual 4 and her daughter,
18 Jane Doe 10 (then age 14), moved from Monument, Colorado, to Colorado City, Arizona,
19 around the same time defendant SAMUEL RAPPYLEE BATEMAN and his wives were
20 also moving back to Colorado City, Arizona.

21 116. On or between January 1 and April 30, 2021, defendant SAMUEL
22 RAPPYLEE BATEMAN slept with Jane Doe 10 (then age 14) and multiple wives,
23 including defendants NAOMI BISTLINE and LEIA BISTLINE. Defendant Bateman
24 ordered everyone to take their clothes off and had sex with defendant LEIA BISTLINE in
25 front of Jane Doe 10.

26 117. On or between January 28 and November 5, 2021, defendant SAMUEL
27 RAPPYLEE BATEMAN took Jane Doe 9 (then age 11) as a wife.

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1 118. On or between February 1 and February 13, 2021, defendant SAMUEL
2 RAPPYLEE BATEMAN moved with his wives and followers to Colorado City, Arizona.

3 119. On or between January 1, 2021 and August 27, 2022, in Colorado City,
4 Arizona, defendant SAMUEL RAPPYLEE BATEMAN repeatedly engaged in group
5 sexual activity with and in front of his minor and adult wives, including defendants
6 NAOMI BISTLINE, BRENDA BARLOW, MARONA JOHNSON, and LEIA BISTLINE.

7 120. On or about February 21, 2021, M.J. and defendant LADELL JAY
8 BISTLINE, JR. committed to defendant SAMUEL RAPPYLEE BATEMAN on a group
9 call that they had given everything to defendant BATEMAN, whom they referenced as
10 “President Samuel R. Bateman,” to include their wives and their children. The call was
11 audio recorded and uploaded to YouTube.

12 121. On or about March 2, 2021, M.J. contacted defendant LEILANI BARLOW
13 by cell phone, telling her Jane Doe 11 (then age 14) was to receive “training” from
14 defendant LEILANI BARLOW. M.J. met with defendant LEILANI BARLOW and Jane
15 Doe 11 in his vehicle at the blue house in Colorado City, Arizona. M.J. told Jane Doe 11
16 to stop being rebellious and that she needed to ask defendant SAMUEL RAPPYLEE
17 BATEMAN for forgiveness for not following the whisperings of the Spirit of God.
18 Defendant LEILANI BARLOW contacted defendant BATEMAN by cell phone and told
19 him they wanted to talk to him.

20 122. As recorded by Jane Doe 11, on or about March 2, 2021, she went upstairs
21 to defendant SAMUEL RAPPYLEE BATEMAN with defendant LEILANI BARLOW to
22 dedicate her life to “Father” (defendant BATEMAN) and got a “severe correction.”
23 Defendant BATEMAN gave Jane Doe 11 a “sermon” that she needed to stop being
24 rebellious.

25 123. The next day, defendant LEILANI BARLOW prepared a text message for
26 her daughter, Jane Doe 11, to send to defendant SAMUEL RAPPYLEE BATEMAN about
27 going to him. Defendant LEILANI BARLOW made Jane Doe 11 push send on the text
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1 message, saying this was Jane Doe 11's "deal." Shortly thereafter, they went to defendant
2 BATEMAN's house and met in a small room, where defendant BATEMAN told Jane Doe
3 11 that she and her sisters belonged to him. Defendant BATEMAN told Jane Doe 11 that
4 he felt like God wanted her to hug him, so she did. They walked into the living room
5 holding hands, and she got into the car with him and some of her sisters and they went for
6 a hike.

7 124. On or about March 3, 2021, as recorded by Jane Doe 11 (then age 14), she
8 married defendant SAMUEL RAPPYLEE BATEMAN and had "an extreme trying
9 experience."

10 125. On or about March 4, 2021, as recorded by Jane Doe 11, defendant LEIA
11 BISTLINE took Jane Doe 11 to defendant SAMUEL RAPPYLEE BATEMAN, and she
12 had a "most dear and precious experience."

13 126. On or about March 8, 2021, defendant SAMUEL RAPPYLEE BATEMAN
14 asked Jane Doe 10 (then age 14) if she had a testimony of where she was supposed to be.

15 127. On or between March 12 and March 13, 2021, defendant SAMUEL
16 RAPPYLEE BATEMAN took Jane Doe 3, Jane Doe 4, Jane Doe 7, Jane Doe 9, Jane Doe
17 11, defendant NAOMI BISTLINE, and others back to Lincoln, Nebraska, to pick up Jane
18 Doe 5 and the rest of defendant BATEMAN's wives and their babies.

19 128. On that trip, as recorded by Jane Doe 11, they stayed at a Hampton Inn in
20 Rawlins, Wyoming, where defendant SAMUEL RAPPYLEE BATEMAN slept in the bed
21 with Jane Doe 3 (then age 14) and Jane Doe 11 (then age 14).

22 129. On or about March 15, 2021, in separate vehicles, defendant SAMUEL
23 RAPPYLEE BATEMAN and his wives started traveling back to Colorado City, Arizona,
24 from Lincoln, Nebraska.

25 130. On or about March 16, 2021, defendant BRENDA BARLOW and others
26 decorated the room for Individual 8 and Jane Doe 10, who were recently married to
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1 defendant SAMUEL RAPPYLEE BATEMAN. Defendant BATEMAN arrived in
2 Colorado City, Arizona that night.

3 131. On or about March 17, 2021, defendant SAMUEL RAPPYLEE BATEMAN
4 asked Jane Doe 10 (then age 14) to come to his room. Defendant LEIA BISTLINE brought
5 her into the room where defendant BATEMAN was with some of his other adult wives.
6 The other wives left, but defendant LEIA BISTLINE stayed. Defendant BATEMAN asked
7 if Jane Doe 10 felt left out when she saw other girls touching him. Jane Doe 10 said no,
8 and defendant BATEMAN said she was lying because he could see it in her eyes.
9 Defendant BATEMAN then asked if she wanted to come to him, and she said yes. They
10 hugged and kissed, and defendant BATEMAN told her she kissed just like defendant LEIA
11 BISTLINE. Defendant BATEMAN and Jane Doe 10 laid together and she held his hand,
12 touched his hair, and “touched him” all night long. Jane Doe 10 believed another girl was
13 in bed with them.

14 132. On or about March 18, 2021, defendant SAMUEL RAPPYLEE BATEMAN
15 woke up Jane Doe 10 by kissing her face all over.

16 133. After Jane Doe 10 went to defendant SAMUEL RAPPYLEE BATEMAN,
17 he started saying, “I want to fuck you.” One night, he had sex with defendant LEIA
18 BISTLINE. Defendant NAOMI BISTLINE was also present. They were all naked, and
19 Jane Doe 10 and Individual 8 were just standing there. Defendant BATEMAN ordered
20 them to take their clothes off, so they did. Defendant BATEMAN slept in between Jane
21 Doe 10 and Individual 8 that night.

22 134. On or about March 18, 2021, SAMUEL RAPPYLEE BATEMAN
23 transported the remainder of his wives by motor vehicle from Lincoln, Nebraska, to
24 Colorado City, Arizona.

25 135. On or between April 1 and April 30, 2021, defendant SAMUEL RAPPYLEE
26 BATEMAN had sex with Jane Doe 10 (then age 14), while defendant NAOMI BISTLINE,
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1 Jane Doe 5 (then age 13), and possibly Jane Doe 7 (then age 12) were present. Jane Doe 5
2 held Jane Doe 10's hand while defendant BATEMAN was having sex with Jane Doe 10.

3 136. On or between April 1, 2021 and September 12, 2022, defendant SAMUEL
4 RAPPYLEE BATEMAN had anal sex with Jane Doe 10 (then age 14 or 15).

5 137. On or between May 8 and May 11, 2021, defendant SAMUEL RAPPYLEE
6 BATEMAN and his wives moved into the green house in Colorado City, Arizona.

7 138. After moving into the green house, defendant SAMUEL RAPPYLEE
8 BATEMAN began having his wives sleep naked with him, more than one at a time. After
9 some time, he told them they had to ask him for sex or it would not happen. The first time
10 Jane Doe 11 (then age 14) slept naked with defendant BATEMAN, he told her to take her
11 clothes off and reminded her, "[T]his is Heavenly Father's commandment, not mine."
12 Individual 9 was naked in bed with them that night. Defendant BATEMAN touched Jane
13 Doe 11's vagina and asked her to touch his penis, but she refused.

14 139. The first time defendant SAMUEL RAPPYLEE BATEMAN had sex with
15 Jane Doe 11 was in the green house, and several of his wives were present, including
16 defendants MARONA JOHNSON, BRENDA BARLOW, and LEIA BISTLINE.
17 Defendant BATEMAN put his penis in her anus so she would not get pregnant. The wives
18 were touching her breasts and other parts of her body.

19 140. On or about May 9, 2021, defendant SAMUEL RAPPYLEE BATEMAN
20 married Jane Doe 11's mother, defendant LEILANI BARLOW.

21 141. On or about May 17, 2021, AZ DCS personnel interviewed defendant
22 LADELL JAY BISTLINE, JR. Defendant BISTLINE, JR. denied there were any concerns
23 regarding his children and sexual abuse. M.J. was present for the interview and interrupted
24 the AZ DCS personnel conducting the interview.

25 142. On or about May 17, 2021, AZ DCS personnel visited defendant
26 JOSEPHINE BARLOW BISTLINE and interviewed her regarding allegations involving
27 her daughters. She denied the allegations and said she did not want to talk to AZ DCS or
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1 answer their questions. While AZ DCS was present in the home, they encountered many
2 of defendant SAMUEL RAPPYLEE BATEMAN's wives, many of whom also refused to
3 talk to AZ DCS. AZ DCS personnel also attempted to speak with Jane Doe 8 and Jane
4 Doe 9, but the mothers would not allow AZ DCS personnel to speak alone with the girls
5 and would not allow them to ask certain questions.

6 143. On or about June 21, 2021, defendant SAMUEL RAPPYLEE BATEMAN
7 sent a group message to his wives and followers that he would not go to the blue house
8 until Individual 2 stops "bitching."

9 144. On or about June 29, 2021, as recorded by Jane Doe 10 (then age 14),
10 defendant SAMUEL RAPPYLEE BATEMAN took Jane Doe 10 for a ride to the creek,
11 where they "worshipped our God in an unexpressable way" and had "holy sex."

12 145. On or between August 1, 2021 and September 12, 2022, defendant SAMUEL
13 RAPPYLEE BATEMAN admitted to M.J. that he had anal sex with M.J.'s daughter, Jane
14 Doe 6 (then age 10 to 12).

15 146. On or between August 1 and August 31, 2021, defendant SAMUEL
16 RAPPYLEE BATEMAN took Jane Doe 3 (then age 15) to Pigeon Canyon, Arizona, for
17 their anniversary. They had sex, and she described that defendant BATEMAN would put
18 his penis inside of her and then pull it out because he didn't want to get her pregnant.

19 147. On or between August 10, 2021 and May 2022, defendant SAMUEL
20 RAPPYLEE BATEMAN first tried to have sex with Jane Doe 6 (then age 11). Defendant
21 BATEMAN had one of the girls get Jane Doe 6 and tell her to go to defendant
22 BATEMAN's room. Defendant NAOMI BISTLINE, Jane Doe 7, Jane Doe 5, and another
23 girl were present. Defendant BATEMAN could not get his penis to go past a certain point,
24 and Jane Doe 6's "parts swoll [sic] up." After he was done, defendant BATEMAN told
25 Jane Doe 7 (then age 12 or 13), "Let's do it," and then he had sex with Jane Doe 7.

26 148. On or about September 7, 2021, as recorded by Jane Doe 10, defendant
27 SAMUEL RAPPYLEE BATEMAN "slept" with Jane Doe 10 (then age 14).

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1 149. On or between October 18 and October 19, 2021, defendant TORRANCE
2 BISTLINE purchased a Bentley for defendant SAMUEL RAPPYLEE BATEMAN.

3 150. On or about November 1, 2021, in Colorado City, Arizona, Jane Doe 5 (then
4 age 14) was at the blue house when defendant LEIA BISTLINE showed Jane Doe 5 a text
5 message from defendant SAMUEL RAPPYLEE BATEMAN. The text message instructed
6 defendant LEIA BISTLINE to come to the green house and bring Jane Doe 5 with her.
7 Defendant JOSEPHINE BARLOW BISTLINE went with them to the green house.
8 Defendant BATEMAN called M.J. and told him to come to the green house. M.J. arrived
9 with one of his wives, Individual 6. Defendant JOSEPHINE BARLOW BISTLINE
10 answered the door and took them to defendant BATEMAN's bedroom. Defendants LEIA
11 BISTLINE and JOSEPHINE BARLOW BISTLINE, and Jane Doe 5, were all there with
12 defendant BATEMAN, and they were all naked. Defendant BATEMAN said the Lord was
13 requiring him to conduct a "sacred ordinance." Defendant BATEMAN said, "[defendant
14 LEIA BISTLINE] is with child and the Lord wants you [M.J.] to be with her, and I will be
15 with [Individual 6]." Defendant BATEMAN watched while M.J. had sex with defendant
16 LEIA BISTLINE. Defendant BATEMAN touched Jane Doe 5's breasts and vagina. M.J.
17 and Individual 6 then left.

18 151. On or about November 1, 2021, in Colorado City, Arizona, defendant LEIA
19 BISTLINE contacted defendant NAOMI BISTLINE and Jane Doe 7 (then age 12) and told
20 them that "Father" (referring to defendant SAMUEL RAPPYLEE BATEMAN) had a
21 "sacred mission" for them. Defendant BATEMAN sent defendants LEIA BISTLINE and
22 JOSEPHINE BARLOW BISTLINE to pick up defendant NAOMI BISTLINE and Jane
23 Doe 7 and bring them to the green house. While they were gone, defendant BATEMAN
24 had sexual intercourse with Jane Doe 5. Then defendant BATEMAN drove with Jane Doe
25 5 to defendant TORRANCE BISTLINE's business, and picked up defendants
26 TORRANCE BISTLINE and LADELL JAY BISTLINE, JR. Defendant BATEMAN gave
27 Jane Doe 7 to defendant TORRANCE BISTLINE and watched him have anal sex with her.

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1 Defendant BATEMAN also gave defendant NAOMI BISTLINE to defendant LADELL
2 JAY BISTLINE, JR. and watched them have sex. Later, defendant BATEMAN announced
3 to all of his followers what happened, and explained that it was an “atonement” requiring
4 him to sacrifice his most precious possessions.

5 152. Later that night, defendant SAMUEL RAPPYLEE BATEMAN had sex with
6 defendant NAOMI BISTLINE, while Jane Doe 11 (then age 15) was touching him.

7 153. On or about November 5, 2021, defendants SAMUEL RAPPYLEE
8 BATEMAN, NAOMI BISTLINE, and TORRANCE BISTLINE went to Salt Lake City,
9 Utah, to pick up the second Bentley defendant TORRANCE BISTLINE purchased for
10 defendant BATEMAN.

11 154. On or about November 13, 2021, defendant SAMUEL RAPPYLEE
12 BATEMAN and others went to Salt Lake City, Utah, to pick up two Range Rovers, one of
13 which was purchased by defendant LADELL JAY BISTLINE, JR.

14 155. On or about January 29, 2022, defendant SAMUEL RAPPYLEE
15 BATEMAN took M.B.2, Individual 8, defendant LEIA BISTLINE, and Jane Doe 10 (then
16 age 15) to a hotel room in Colorado. Defendant BATEMAN wanted M.B.2 to sleep with
17 him, but she refused. He slept with Jane Doe 10 under a blanket and touched her vagina.
18 Jane Doe 10 said it was not sex, but it kind of felt like it.

19 156. On or about February 16, 2022, as recorded by Jane Doe 9, defendant
20 SAMUEL RAPPYLEE BATEMAN traveled with Jane Doe 9 (then age 12) and others to
21 Las Vegas, Nevada, where they stayed in a hotel. Defendant BATEMAN “slept” with Jane
22 Doe 9.

23 157. On or about March 3, 2022, for their first anniversary, defendant SAMUEL
24 RAPPYLEE BATEMAN took Jane Doe 11 (then age 15) for a ride on his side-by-side to
25 the bottom of the Watchman Mountain, in Utah, where they pitched a tent, and he had sex
26 with her. They hadn’t had sex for the prior six months because Jane Doe 11 had not asked
27 for it, but on this occasion, defendant BATEMAN asked her if she would have sex and she
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1 agreed. For Jane Doe 11, having sex meant anal sex until she turned 18 because defendant
2 BATEMAN did not want to get her pregnant.

3 158. On or about April 15, 2022, defendant SAMUEL RAPPYLEE BATEMAN
4 told M.B.2 to move her office to the blue house and not come to the green house because
5 defendant BATEMAN needed to teach and train his family. After sending M.B.2 to the
6 blue house, defendant BATEMAN told Jane Doe 11 that she needed to be closer to him,
7 and sent her back to the blue house. After one night, defendant BATEMAN had defendant
8 LEILANI BARLOW bring Jane Doe 11 back to the green house, and defendant
9 BATEMAN told Jane Doe 11 she could stay if she promised to start following the
10 whisperings of the spirit of God and start obeying.

11 159. On or about May 2022, in Colorado City, Arizona, defendant SAMUEL
12 RAPPYLEE BATEMAN took Jane Doe 6 (then age 11) for a motorbike ride, took both of
13 their clothes off, and put his penis in Jane Doe 6's vagina.

14 160. A few months before September 13, 2022, as reported by Jane Doe 10, in the
15 green house in Colorado City, Arizona, defendant SAMUEL RAPPYLEE BATEMAN had
16 sex with Jane Doe 6 (then age 11) in front of Jane Doe 10 (then age 15), and it looked
17 painful.

18 161. On or between July 1 and September 12, 2022, defendant SAMUEL
19 RAPPYLEE BATEMAN had sex with Jane Doe 3 (then age 16) at campsites they visited
20 that summer, including one in Apple Valley, Utah.

21 162. On or about August 28, 2022, defendant SAMUEL RAPPYLEE BATEMAN
22 was driving on the highway in Arizona with Jane Doe 4, Jane Doe 7, and Jane Doe 8 in an
23 attached box trailer. Defendants BATEMAN, NAOMI BISTLINE, and MORETTA ROSE
24 JOHNSON, and Jane Doe 9 and Jane Doe 10 (sitting in the passenger compartment) were
25 pulled over by Arizona Department of Public Safety. Defendant BATEMAN was arrested
26 and his cell phone was seized.

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1 163. On or about August 28, 2022, defendant SAMUEL RAPPYLEE BATEMAN
2 called defendant TORRANCE BISTLINE from custody and told him to delete his Signal
3 account, after defendant BATEMAN's phone was seized by law enforcement.

4 164. On or about August 28, 2022, defendant SAMUEL RAPPYLEE BATEMAN
5 called his wives and instructed defendant BRENDA BARLOW to delete his Signal account
6 and every message "right now," which the wives confirmed they were doing "right now."

7 165. On or about September 2, 2022, after defendant SAMUEL RAPPYLEE
8 BATEMAN was released on bond from state custody, defendant BATEMAN inquired how
9 he could factory reset his phone.

10 166. On or about September 12, 2022, in an RV in Utah, defendant SAMUEL
11 RAPPYLEE BATEMAN had sex with Jane Doe 10 (then age 15), while defendant
12 BRENDA BARLOW helped by touching defendant BATEMAN.

13 167. On or about September 12, 2022, in an RV in Utah, defendant SAMUEL
14 RAPPYLEE BATEMAN had sex with Jane Doe 5 (then age 15), and this was the first time
15 defendant BATEMAN used a condom. Defendant BRENDA BARLOW and Jane Doe 10
16 (then age 15) were also present.

17 168. On the morning of September 13, 2022, defendant BRENDA BARLOW,
18 Jane Doe 10, and Jane Doe 9 went back to the RV in Utah, where defendant SAMUEL
19 RAPPYLEE BATEMAN had stayed the night before with Jane Doe 10 and defendant
20 BRENDA BARLOW. When they learned the FBI was in Colorado City, Arizona,
21 defendant BRENDA BARLOW hid defendant BATEMAN's tablet and computer, as well
22 as the keys to the RV.

23 169. On or about September 13, 2022, defendant NAOMI BISTLINE threw a
24 backpack full of condoms, digital devices, and other items out a window in an attempt to
25 hide it during the execution of a federal search warrant at their home.

26 170. On or about September 13, 2022, defendant MARONA JOHNSON hid a
27 USB drive that contained "the Priesthood Record," which documented the activities of
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1 defendant SAMUEL RAPPYLEE BATEMAN, as well as her own journal, to avoid it being
2 collected by the FBI. She gave it to another witness for safekeeping. Per defendant
3 BATEMAN's instructions, defendant TORRANCE BISTLINE obtained the USB drive
4 from the witness and said it needed to be buried.

5 171. Beginning on a date unknown, but at times during the conspiracy, defendant
6 SAMUEL RAPPYLEE BATEMAN instructed his minor wives what to say if they were
7 ever interviewed.

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

9 **COUNT 2**

10 173. The allegations contained in all preceding paragraphs are realleged and
11 incorporated herein as if fully set forth in this paragraph.

12 174. Beginning at a time unknown, but at least from on or about September 4,
13 2019 through on or about September 13, 2022, in the District of Arizona and elsewhere,
14 defendant SAMUEL RAPPYLEE BATEMAN, and others known and unknown to the
15 grand jury, did knowingly and willfully conspire and agree together and with each other,
16 to knowingly transport, and cause to be transported, an individual who had not attained the
17 age of 18 years, to wit: Jane Doe 6, Jane Doe 3, Jane Doe 5, Jane Doe 4, Jane Doe 7, Jane
18 Doe 9, Jane Doe 8, Jane Doe 11, and Jane Doe 10, in interstate commerce, with the intent
19 that such individual engage in sexual activity for which any person can be charged with a
20 criminal offense, in violation of Title 18, United States Code, Sections 2423(a) and 2.

21 175. All in violation of Title 18, United States Code, Section 2423(e).

22 **COUNT 3**

23 176. The allegations contained in all preceding paragraphs are realleged and
24 incorporated herein as if fully set forth in this paragraph.

25 177. Beginning at a time unknown, but at least from on or about September 4,
26 2019 through on or about September 13, 2022, in the District of Arizona and elsewhere,
27 defendant SAMUEL RAPPYLEE BATEMAN, and others known and unknown to the
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1 grand jury, did knowingly and willfully conspire and agree together and with each other,
2 to knowingly travel in interstate commerce for the purpose of engaging in any illicit sexual
3 conduct, as defined in Title 18, United States Code, Section 2423(f), with another person,
4 to wit: Jane Doe 3, Jane Doe 4, Jane Doe 5, Jane Doe 7, and Jane Doe 10, in violation of
5 Title 18, United States Code, Sections 2423(b) and 2.

6 178. All in violation of Title 18, United States Code, Section 2423(e).

7 **COUNT 4**

8 179. The allegations contained in all preceding paragraphs are realleged and
9 incorporated herein as if fully set forth in this paragraph.

10 180. On or between March 26 and May 8, 2020, in the District of Arizona and
11 elsewhere, defendant SAMUEL RAPPYLEE BATEMAN, and others known and
12 unknown to the grand jury, did knowingly persuade, induce, entice, and coerce Jane Doe
13 6 to travel in interstate commerce, from Nebraska to Arizona, to engage in sexual activity
14 for which any person can be charged with a criminal offense, namely, Sexual Conduct with
15 a Minor, which was a criminal offense under Arizona Revised Statute 13-1405;
16 Molestation of a Child, which was a criminal offense under Arizona Revised Statute 13-
17 1410; Sexual Abuse, which was a criminal offense under Arizona Revised Statute 13-1404;
18 Sexual Assault of a Child in the First Degree, which was a criminal offense under Nebraska
19 Revised Statute 28-319.01; and Sexual Assault of a Child in the Third Degree, which was
20 a criminal offense under Nebraska Revised Statute 28-320.01.

21 181. In violation of Title 18, United States Code, Sections 2422(a) and 2.

22 **COUNT 5**

23 182. The allegations contained in all preceding paragraphs are realleged and
24 incorporated herein as if fully set forth in this paragraph.

25 183. On or between March 26, 2020 and September 13, 2022, in the District of
26 Arizona and elsewhere, defendant SAMUEL RAPPYLEE BATEMAN, and others known
27 and unknown to the grand jury, did use a facility and means of interstate commerce to
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1 knowingly persuade, induce, entice, and coerce Jane Doe 6, who had not attained the age
2 of 18 years, to engage in sexual activity for which any person can be charged with a
3 criminal offense, namely, Sexual Conduct with a Minor, which was a criminal offense
4 under Arizona Revised Statute 13-1405; Molestation of a Child, which was a criminal
5 offense under Arizona Revised Statute 13-1410; Sexual Abuse, which was a criminal
6 offense under Arizona Revised Statute 13-1404; Sexual Assault of a Child in the First
7 Degree, which was a criminal offense under Nebraska Revised Statute 28-319.01; and
8 Sexual Assault of a Child in the Third Degree, which was a criminal offense under
9 Nebraska Revised Statute 28-320.01.

10 184. In violation of Title 18, United States Code, Sections 2422(b) and 2.

11 **COUNT 6**

12 185. The allegations contained in all preceding paragraphs are realleged and
13 incorporated herein as if fully set forth in this paragraph.

14 186. On or between May 5 and May 8, 2020, in the District of Arizona and
15 elsewhere, defendant SAMUEL RAPPYLEE BATEMAN, and others known and
16 unknown to the grand jury, did knowingly transport, from Nebraska to Arizona, Jane Doe
17 6, who had not attained the age of 18 years, in interstate commerce, with the intent that
18 such individual engage in sexual activity for which any person can be charged with a
19 criminal offense, namely, Sexual Conduct with a Minor, which was a criminal offense
20 under Arizona Revised Statute 13-1405; Molestation of a Child, which was a criminal
21 offense under Arizona Revised Statute 13-1410; Sexual Abuse, which was a criminal
22 offense under Arizona Revised Statute 13-1404; Sexual Assault of a Child in the First
23 Degree, which was a criminal offense under Nebraska Revised Statute 28-319.01; and
24 Sexual Assault of a Child in the Third Degree, which was a criminal offense under
25 Nebraska Revised Statute 28-320.01.

26 187. In violation of Title 18, United States Code, Sections 2423(a) and 2.
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COUNT 7

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2 188. The allegations contained in all preceding paragraphs are realleged and
3 incorporated herein as if fully set forth in this paragraph.

4 189. On or between July 1, 2020 and March 18, 2021, in the District of Arizona
5 and elsewhere, defendant SAMUEL RAPPYLEE BATEMAN, and others known and
6 unknown to the grand jury, did knowingly persuade, induce, entice, and coerce Jane Doe
7 3 to travel in interstate commerce, back and forth from Nebraska to Arizona, to engage in
8 sexual activity for which any person can be charged with a criminal offense, namely,
9 Sexual Assault of a Child in the First Degree, which was a criminal offense under Nebraska
10 Revised Statute 28-319.01 (through April 14, 2022); Sexual Assault of a Child in the Third
11 Degree, which was a criminal offense under Nebraska Revised Statute 28-320.01 (through
12 April 14, 2021); Sexual Conduct with a Minor, which was a criminal offense under Arizona
13 Revised Statute 13-1405; Molestation of a Child, which was a criminal offense under
14 Arizona Revised Statute 13-1410 (through April 14, 2021); Sexual Abuse, which was a
15 criminal offense under Arizona Revised Statute 13-1404 (through April 14, 2021);
16 Production of Child Pornography, which was a criminal offense under Title 18, United
17 States Code, Section 2251(a); Unlawful Sexual Contact, which was a criminal offense
18 under Colorado Revised Statute 18-3-404(1.5); Sexual Assault on a Child, which was a
19 criminal offense under Colorado Revised Statute 18-3-405 (through April 14, 2021);
20 Sexual Abuse of a Minor in the First Degree, which was a criminal offense under Wyoming
21 Statute 6-2-314 (through April 14, 2022); Sexual Abuse of a Minor in the Second Degree,
22 which was a criminal offense under Wyoming Statute 6-2-315 (through April 14, 2022);
23 Sexual Abuse of a Minor in the Third Degree, which was a criminal offense under
24 Wyoming Statute 6-2-316 (through April 14, 2022); and Unlawful Sexual Conduct with a
25 16 or 17 Year Old, which was a criminal offense under Utah Code 76-5-401.2

26 190. In violation of Title 18, United States Code, Sections 2422(a) and 2.
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COUNT 8

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2 191. The allegations contained in all preceding paragraphs are realleged and
3 incorporated herein as if fully set forth in this paragraph.

4 192. On or between November 20, 2020 and September 13, 2022, in the District
5 of Arizona and elsewhere, defendant SAMUEL RAPPYLEE BATEMAN, and others
6 known and unknown to the grand jury, did use a facility and means of interstate commerce
7 to knowingly persuade, induce, entice, and coerce Jane Doe 3, who had not attained the
8 age of 18 years, to engage in sexual activity for which any person can be charged with a
9 criminal offense, namely, Sexual Assault of a Child in the First Degree, which was a
10 criminal offense under Nebraska Revised Statute 28-319.01 (through April 14, 2022);
11 Sexual Assault of a Child in the Third Degree, which was a criminal offense under
12 Nebraska Revised Statute 28-320.01 (through April 14, 2021); Sexual Conduct with a
13 Minor, which was a criminal offense under Arizona Revised Statute 13-1405; Molestation
14 of a Child, which was a criminal offense under Arizona Revised Statute 13-1410 (through
15 April 14, 2021); Sexual Abuse, which was a criminal offense under Arizona Revised
16 Statute 13-1404 (through April 14, 2021); Production of Child Pornography, which was a
17 criminal offense under Title 18, United States Code, Section 2251(a); Unlawful Sexual
18 Contact, which was a criminal offense under Colorado Revised Statute 18-3-404(1.5);
19 Sexual Assault on a Child, which was a criminal offense under Colorado Revised Statute
20 18-3-405 (through April 14, 2021); Sexual Abuse of a Minor in the First Degree, which
21 was a criminal offense under Wyoming Statute 6-2-314 (through April 14, 2022); Sexual
22 Abuse of a Minor in the Second Degree, which was a criminal offense under Wyoming
23 Statute 6-2-315 (through April 14, 2022); Sexual Abuse of a Minor in the Third Degree,
24 which was a criminal offense under Wyoming Statute 6-2-316 (through April 14, 2022);
25 and Unlawful Sexual Conduct with a 16 or 17 Year Old, which was a criminal offense
26 under Utah Code 76-5-401.2.

27 193. In violation of Title 18, United States Code, Sections 2422(b) and 2.
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COUNT 9

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2 194. The allegations contained in all preceding paragraphs are realleged and
3 incorporated herein as if fully set forth in this paragraph.

4 195. On or between November 20, 2020 and March 18, 2021, in the District of
5 Arizona and elsewhere, defendant SAMUEL RAPPYLEE BATEMAN, and others known
6 and unknown to the grand jury, did knowingly transport, and cause to be transported, Jane
7 Doe 3, who had not attained the age of 18 years, in interstate commerce, back and forth
8 from Nebraska to Arizona, with the intent that Jane Doe 3 engage in sexual activity for
9 which any person can be charged with a criminal offense, namely, Sexual Assault of a
10 Child in the First Degree, which was a criminal offense under Nebraska Revised Statute
11 28-319.01 (through April 14, 2022); Sexual Assault of a Child in the Third Degree, which
12 was a criminal offense under Nebraska Revised Statute 28-320.01 (through April 14,
13 2021); Sexual Conduct with a Minor, which was a criminal offense under Arizona Revised
14 Statute 13-1405; Molestation of a Child, which was a criminal offense under Arizona
15 Revised Statute 13-1410 (through April 14, 2021); Sexual Abuse, which was a criminal
16 offense under Arizona Revised Statute 13-1404 (through April 14, 2021); Production of
17 Child Pornography, which was a criminal offense under Title 18, United States Code,
18 Section 2251(a); Unlawful Sexual Contact, which was a criminal offense under Colorado
19 Revised Statute 18-3-404(1.5); Sexual Assault on a Child, which was a criminal offense
20 under Colorado Revised Statute 18-3-405 (through April 14, 2021); Sexual Abuse of a
21 Minor in the First Degree, which was a criminal offense under Wyoming Statute 6-2-314
22 (through April 14, 2022); Sexual Abuse of a Minor in the Second Degree, which was a
23 criminal offense under Wyoming Statute 6-2-315 (through April 14, 2022); Sexual Abuse
24 of a Minor in the Third Degree, which was a criminal offense under Wyoming Statute 6-
25 2-316 (through April 14, 2022); and Unlawful Sexual Conduct with a 16 or 17 Year Old,
26 which was a criminal offense under Utah Code 76-5-401.2.

27 196. In violation of Title 18, United States Code, Sections 2423(a) and 2.
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COUNT 10

197. The allegations contained in all preceding paragraphs are realleged and incorporated herein as if fully set forth in this paragraph.

198. On or between July 1 and September 12, 2022, in the District of Arizona and elsewhere, defendant SAMUEL RAPPYLEE BATEMAN, and others known and unknown to the grand jury, did knowingly transport, and caused to be transported, Jane Doe 3, who had not attained the age of 18 years, in interstate commerce, from Arizona to Utah, with the intent that Jane Doe 3 engage in sexual activity for which any person can be charged with a criminal offense, namely, Unlawful Sexual Conduct with a 16 or 17 Year Old, which was a criminal offense under Utah Code 76-5-401.2.

199. In violation of Title 18, United States Code, Sections 2423(a) and 2.

COUNT 11

200. The allegations contained in all preceding paragraphs are realleged and incorporated herein as if fully set forth in this paragraph.

201. On or between November 25 and November 27, 2020, in the District of Arizona and elsewhere, defendants SAMUEL RAPPYLEE BATEMAN and JOSEPHINE BARLOW BISTLINE, and others known and unknown to the grand jury, did employ, use, persuade, entice, induce and coerce a minor, and did attempt to do so, to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct and for the purpose of transmitting a live visual depiction of such conduct, knowing or having reason to know that the visual depiction would be transported and transmitted using any means and facility of interstate commerce, and in and affecting interstate commerce, and that the visual depiction would be produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate commerce by any means, including by computer.

202. In violation of Title 18, United States Code, Sections 2251(a), (e), 2256, and 2.

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COUNT 12

203. The allegations contained in all preceding paragraphs are realleged and incorporated herein as if fully set forth in this paragraph.

204. On or about November 25 and November 27, 2020, in the District of Arizona and elsewhere, defendant LADELL JAY BISTLINE, JR. did knowingly receive and attempt to receive visual depictions that were produced with the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct. The visual depictions were in the form of live transmissions that that were distributed using any means or facility of interstate commerce; had been mailed, shipped and transported in and affecting interstate commerce; and contained materials which had been mailed, shipped, and transported, by any means including by computer, in and affecting interstate and foreign commerce.

205. In violation of Title 18, United States Code, Sections 2252(a)(2), (b)(1), and 2256.

COUNT 13

206. The allegations contained in all preceding paragraphs are realleged and incorporated herein as if fully set forth in this paragraph.

207. On or between November 25 and November 27, 2020, in the District of Arizona and elsewhere, defendants SAMUEL RAPPYLEE BATEMAN, JOSEPHINE BARLOW BISTLINE, LADELL JAY BISTLINE, JR., BRENDA BARLOW, and MARONA JOHNSON, and others known and unknown to the grand jury, did, by means of interstate commerce, knowingly transfer, and attempt to transfer, obscene matter to another individual who had not attained the age of 16 years, knowing that the other individual had not attained the age of 16 years.

208. In violation of Title 18, United States Code, Sections 1470 and 2.

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COUNT 14

209. The allegations contained in all preceding paragraphs are realleged and incorporated herein as if fully set forth in this paragraph.

210. On or between August 17, 2020 and March 18, 2021, in the District of Arizona and elsewhere, defendant SAMUEL RAPPYLEE BATEMAN, and others known and unknown to the grand jury, did knowingly persuade, induce, entice, and coerce Jane Doe 5 to travel in interstate commerce, from Nebraska to Arizona, to engage in sexual activity for which any person can be charged with a criminal offense, namely, Sexual Assault of a Child in the First Degree, which was a criminal offense under Nebraska Revised Statute 28-319.01; Sexual Assault of a Child in the Third Degree, which was a criminal offense under Nebraska Revised Statute 28-320.01 (through May 23, 2022); Sexual Conduct with a Minor, which was a criminal offense under Arizona Revised Statute 13-1405; Molestation of a Child, which was a criminal offense under Arizona Revised Statute 13-1410 (through May 23, 2022); Sexual Abuse, which was a criminal offense under Arizona Revised Statute 13-1404 (through May 23, 2022); Unlawful Sexual Activity with a Minor, which was a criminal offense under Utah Code 76-5-401; and Sexual Abuse of a Minor, which was a criminal offense under Utah Code 76-5-401.1.

211. In violation of Title 18, United States Code, Sections 2422(a) and 2.

COUNT 15

212. The allegations contained in all preceding paragraphs are realleged and incorporated herein as if fully set forth in this paragraph.

213. On or between November 7, 2020 and September 13, 2022, in the District of Arizona and elsewhere, defendant SAMUEL RAPPYLEE BATEMAN, and others known and unknown to the grand jury, did use a facility and means of interstate commerce to knowingly persuade, induce, entice, and coerce Jane Doe 5, who had not attained the age of 18 years, to engage in sexual activity for which any person can be charged with a criminal offense, namely, Sexual Assault of a Child in the First Degree, which was a

1 criminal offense under Nebraska Revised Statute 28-319.01; Sexual Assault of a Child in
2 the Third Degree, which was a criminal offense under Nebraska Revised Statute 28-320.01
3 (through May 23, 2022); Sexual Conduct with a Minor, which was a criminal offense under
4 Arizona Revised Statute 13-1405; Molestation of a Child, which was a criminal offense
5 under Arizona Revised Statute 13-1410 (through May 23, 2022); Sexual Abuse, which was
6 a criminal offense under Arizona Revised Statute 13-1404 (through May 23, 2022);
7 Unlawful Sexual Activity with a Minor, which was a criminal offense under Utah Code
8 76-5-401; and Sexual Abuse of a Minor, which was a criminal offense under Utah Code
9 76-5-401.1.

10 214. In violation of Title 18, United States Code, Sections 2422(b) and 2.

11 **COUNT 16**

12 215. The allegations contained in all preceding paragraphs are realleged and
13 incorporated herein as if fully set forth in this paragraph.

14 216. On or between January 1 and March 18, 2021, in the District of Arizona and
15 elsewhere, defendant SAMUEL RAPPYLEE BATEMAN, and others known and
16 unknown to the grand jury, did knowingly transport, and cause to be transported, Jane Doe
17 5, who had not attained the age of 18 years, in interstate commerce, from Nebraska to
18 Arizona, with the intent that Jane Doe 5 engage in sexual activity for which any person can
19 be charged with a criminal offense, namely, Sexual Assault of a Child in the First Degree,
20 which was a criminal offense under Nebraska Revised Statute 28-319.01; Sexual Assault
21 of a Child in the Third Degree, which was a criminal offense under Nebraska Revised
22 Statute 28-320.01 (through May 23, 2022); Sexual Conduct with a Minor, which was a
23 criminal offense under Arizona Revised Statute 13-1405; Molestation of a Child, which
24 was a criminal offense under Arizona Revised Statute 13-1410 (through May 23, 2022);
25 and Sexual Abuse, which was a criminal offense under Arizona Revised Statute 13-1404
26 (through May 23, 2022); Unlawful Sexual Activity with a Minor, which was a criminal
27 offense under Utah Code 76-5-401; and Sexual Abuse of a Minor, which was a criminal
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1 offense under Utah Code 76-5-401.1.

2 217. In violation of Title 18, United States Code, Sections 2423(a) and 2.

3 **COUNT 17**

4 218. The allegations contained in all preceding paragraphs are realleged and
5 incorporated herein as if fully set forth in this paragraph.

6 219. On or between September 12 and 13, 2022, in the District of Arizona and
7 elsewhere, defendant SAMUEL RAPPYLEE BATEMAN, and others known and
8 unknown to the grand jury, did knowingly transport, and cause to be transported, Jane Doe
9 5, who had not attained the age of 18 years, in interstate commerce, from Arizona to Utah,
10 with the intent that Jane Doe 5 engage in sexual activity for which any person can be
11 charged with a criminal offense, namely, Unlawful Sexual Activity with a Minor, which
12 was a criminal offense under Utah Code 76-5-401; and Sexual Abuse of a Minor, which
13 was a criminal offense under Utah Code 76-5-401.1.

14 220. In violation of Title 18, United States Code, Sections 2423(a) and 2.

15 **COUNT 18**

16 221. The allegations contained in all preceding paragraphs are realleged and
17 incorporated herein as if fully set forth in this paragraph.

18 222. On or between September 27, 2020 and March 18, 2021, in the District of
19 Arizona and elsewhere, defendant SAMUEL RAPPYLEE BATEMAN, and others known
20 and unknown to the grand jury, did knowingly persuade, induce, entice, and coerce Jane
21 Doe 4 to travel in interstate commerce, back and forth from Nebraska to Arizona, to engage
22 in sexual activity for which any person can be charged with a criminal offense, namely,
23 Sexual Assault of a Child in the First Degree, which was a criminal offense under Nebraska
24 Revised Statute 28-319.01; Sexual Assault of a Child in the Third Degree, which was a
25 criminal offense under Nebraska Revised Statute 28-320.01; Sexual Conduct with a Minor,
26 which was a criminal offense under Arizona Revised Statute 13-1405; Molestation of a

1 Child, which was a criminal offense under Arizona Revised Statute 13-1410; and Sexual
2 Abuse, which was a criminal offense under Arizona Revised Statute 13-1404.

3 223. In violation of Title 18, United States Code, Sections 2422(a) and 2.

4 **COUNT 19**

5 224. The allegations contained in all preceding paragraphs are realleged and
6 incorporated herein as if fully set forth in this paragraph.

7 225. On or between September 29, 2020 and September 13, 2022, in the District
8 of Arizona and elsewhere, defendant SAMUEL RAPPYLEE BATEMAN, and others
9 known and unknown to the grand jury, did use a facility and means of interstate commerce
10 to knowingly persuade, induce, entice, and coerce Jane Doe 4, who had not attained the
11 age of 18 years, to engage in sexual activity for which any person can be charged with a
12 criminal offense, namely, Sexual Assault of a Child in the First Degree, which was a
13 criminal offense under Nebraska Revised Statute 28-319.01; Sexual Assault of a Child in
14 the Third Degree, which was a criminal offense under Nebraska Revised Statute 28-320.01;
15 Sexual Conduct with a Minor, which was a criminal offense under Arizona Revised Statute
16 13-1405; Molestation of a Child, which was a criminal offense under Arizona Revised
17 Statute 13-1410; and Sexual Abuse, which was a criminal offense under Arizona Revised
18 Statute 13-1404.

19 226. In violation of Title 18, United States Code, Sections 2422(b) and 2.

20 **COUNT 20**

21 227. The allegations contained in all preceding paragraphs are realleged and
22 incorporated herein as if fully set forth in this paragraph.

23 228. On or between January 1 and March 18, 2021, in the District of Arizona and
24 elsewhere, defendant SAMUEL RAPPYLEE BATEMAN, and others known and
25 unknown to the grand jury, did knowingly transport, and cause to be transported, Jane Doe
26 4, who had not attained the age of 18 years, in interstate commerce, back and forth from
27 Nebraska to Arizona, with the intent that Jane Doe 4 engage in sexual activity for which
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1 any person can be charged with a criminal offense, namely, Sexual Assault of a Child in
2 the First Degree, which was a criminal offense under Nebraska Revised Statute 28-319.01;
3 Sexual Assault of a Child in the Third Degree, which was a criminal offense under
4 Nebraska Revised Statute 28-320.01; Sexual Conduct with a Minor, which was a criminal
5 offense under Arizona Revised Statute 13-1405; Molestation of a Child, which was a
6 criminal offense under Arizona Revised Statute 13-1410; and Sexual Abuse, which was a
7 criminal offense under Arizona Revised Statute 13-1404.

8 229. In violation of Title 18, United States Code, Sections 2423(a) and 2.

9 **COUNT 21**

10 230. The allegations contained in all preceding paragraphs are realleged and
11 incorporated herein as if fully set forth in this paragraph.

12 231. On or between October 24, 2020 and March 18, 2021, in the District of
13 Arizona and elsewhere, defendant SAMUEL RAPPYLEE BATEMAN, and others known
14 and unknown to the grand jury, did knowingly persuade, induce, entice, and coerce Jane
15 Doe 7 to travel in interstate commerce, back and forth from Nebraska to Arizona, to engage
16 in sexual activity for which any person can be charged with a criminal offense, namely,
17 Sexual Assault of a Child in the First Degree, which was a criminal offense under Nebraska
18 Revised Statute 28-319.01; Sexual Assault of a Child in the Third Degree, which was a
19 criminal offense under Nebraska Revised Statute 28-320.01; Sexual Conduct with a Minor,
20 which was a criminal offense under Arizona Revised Statute 13-1405; Molestation of a
21 Child, which was a criminal offense under Arizona Revised Statute 13-1410; and Sexual
22 Abuse, which was a criminal offense under Arizona Revised Statute 13-1404.

23 232. In violation of Title 18, United States Code, Sections 2422(a) and 2.

24 **COUNT 22**

25 233. The allegations contained in all preceding paragraphs are realleged and
26 incorporated herein as if fully set forth in this paragraph.

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1 criminal offense under Arizona Revised Statute 13-1410; and Sexual Abuse, which was a
2 criminal offense under Arizona Revised Statute 13-1404.

3 238. In violation of Title 18, United States Code, Sections 2423(a) and 2.

4 **COUNT 24**

5 239. The allegations contained in all preceding paragraphs are realleged and
6 incorporated herein as if fully set forth in this paragraph.

7 240. On or between August 8 and August 9, 2020, in the District of Arizona and
8 elsewhere, defendant SAMUEL RAPPYLEE BATEMAN, and others known and
9 unknown to the grand jury, did knowingly travel in interstate commerce, from Arizona to
10 Nebraska, for the purpose of engaging in any illicit sexual conduct, as defined in Title 18,
11 United States Code, Section 2423(f), with Jane Doe 3, Jane Doe 4, Jane Doe 5, and Jane
12 Doe 7.

13 241. In violation of Title 18, United States Code, Sections 2423(b) and 2.

14 **COUNT 25**

15 242. The allegations contained in all preceding paragraphs are realleged and
16 incorporated herein as if fully set forth in this paragraph.

17 243. On or about November 1, 2021, in the District of Arizona and elsewhere,
18 defendants SAMUEL RAPPYLEE BATEMAN, JOSEPHINE BARLOW BISTLINE, and
19 LEIA BISTLINE, and others known and unknown to the grand jury, did use a facility and
20 means of interstate commerce to knowingly persuade, induce, entice, and coerce Jane Doe
21 5, who had not attained the age of 18 years, to engage in sexual activity for which any
22 person can be charged with a criminal offense, namely, Sexual Conduct with a Minor,
23 which was a criminal offense under Arizona Revised Statute 13-1405; Molestation of a
24 Child, which was a criminal offense under Arizona Revised Statute 13-1410; and Sexual
25 Abuse, which was a criminal offense under Arizona Revised Statute 13-1404.

26 244. In violation of Title 18, United States Code, Sections 2422(b) and 2.

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COUNT 26

245. The allegations contained in all preceding paragraphs are realleged and incorporated herein as if fully set forth in this paragraph.

246. On or about November 1, 2021, in the District of Arizona and elsewhere, defendants SAMUEL RAPPYLEE BATEMAN, JOSEPHINE BARLOW BISTLINE, LEIA BISTLINE, and TORRANCE BISTLINE, and others known and unknown to the grand jury, did use a facility and means of interstate commerce to knowingly persuade, induce, entice, and coerce Jane Doe 7, who had not attained the age of 18 years, to engage in sexual activity for which any person can be charged with a criminal offense, namely, Sexual Conduct with a Minor, which was a criminal offense under Arizona Revised Statute 13-1405; Molestation of a Child, which was a criminal offense under Arizona Revised Statute 13-1410; and Sexual Abuse, which was a criminal offense under Arizona Revised Statute 13-1404.

247. In violation of Title 18, United States Code, Sections 2422(b) and 2.

COUNT 27

248. The allegations contained in all preceding paragraphs are realleged and incorporated herein as if fully set forth in this paragraph.

249. On or between August 8, 2020 and March 18, 2021, in the District of Arizona and elsewhere, defendants SAMUEL RAPPYLEE BATEMAN, JOSEPHINE BARLOW BISTLINE, and LADELL JAY BISTLINE, JR., and others known and unknown to the grand jury, did knowingly persuade, induce, entice, and coerce Jane Doe 9 to travel in interstate commerce, back and forth between Arizona, Utah, and Nebraska, to engage in sexual activity for which any person can be charged with a criminal offense, namely, Sexual Conduct with a Minor, which was a criminal offense under Arizona Revised Statute 13-1405; Molestation of a Child, which was a criminal offense under Arizona Revised Statute 13-1410; Sexual Abuse, which was a criminal offense under Arizona Revised Statute 13-1404; Sexual Assault, which was a criminal offense under Nevada Revised

1 Statute 200.366; and Lewdness with Child Under 16 Years, which was a criminal offense
2 under Nevada Revised Statute 201.230.

3 250. In violation of Title 18, United States Code, Sections 2422(a) and 2.

4 **COUNT 28**

5 251. The allegations contained in all preceding paragraphs are realleged and
6 incorporated herein as if fully set forth in this paragraph.

7 252. On or between August 8, 2020 and September 13, 2022, in the District of
8 Arizona and elsewhere, defendants SAMUEL RAPPYLEE BATEMAN, JOSEPHINE
9 BARLOW BISTLINE, and LADELL JAY BISTLINE, JR., and others known and
10 unknown to the grand jury, did use a facility and means of interstate commerce to
11 knowingly persuade, induce, entice, and coerce Jane Doe 9, who had not attained the age
12 of 18 years, to engage in sexual activity for which any person can be charged with a
13 criminal offense, namely, Sexual Conduct with a Minor, which was a criminal offense
14 under Arizona Revised Statute 13-1405; Molestation of a Child, which was a criminal
15 offense under Arizona Revised Statute 13-1410; Sexual Abuse, which was a criminal
16 offense under Arizona Revised Statute 13-1404; Sexual Assault, which was a criminal
17 offense under Nevada Revised Statute 200.366; and Lewdness with Child Under 16 Years,
18 which was a criminal offense under Nevada Revised Statute 201.230.

19 253. In violation of Title 18, United States Code, Sections 2422(b) and 2.

20 **COUNT 29**

21 254. The allegations contained in all preceding paragraphs are realleged and
22 incorporated herein as if fully set forth in this paragraph.

23 255. On or between August 8, 2020 and March 18, 2021, in the District of Arizona
24 and elsewhere, defendants SAMUEL RAPPYLEE BATEMAN, JOSEPHINE BARLOW
25 BISTLINE, and LADELL JAY BISTLINE, JR., and others known and unknown to the
26 grand jury, did knowingly transport, and cause to be transported, Jane Doe 9, who had not
27 attained the age of 18 years, in interstate commerce, back and forth between Arizona, Utah,
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1 and Nebraska, with the intent that Jane Doe 9 engage in sexual activity for which any
2 person can be charged with a criminal offense, namely, Sexual Conduct with a Minor,
3 which was a criminal offense under Arizona Revised Statute 13-1405; Molestation of a
4 Child, which was a criminal offense under Arizona Revised Statute 13-1410; and Sexual
5 Abuse, which was a criminal offense under Arizona Revised Statute 13-1404; Sexual
6 Assault, which was a criminal offense under Nevada Revised Statute 200.366; and
7 Lewdness with Child Under 16 Years, which was a criminal offense under Nevada Revised
8 Statute 201.230.

9 256. In violation of Title 18, United States Code, Sections 2423(a) and 2.

10 **COUNT 30**

11 257. The allegations contained in all preceding paragraphs are realleged and
12 incorporated herein as if fully set forth in this paragraph.

13 258. On or about February 16, 2022, in the District of Arizona and elsewhere,
14 defendant SAMUEL RAPPYLEE BATEMAN, and others known and unknown to the
15 grand jury, did knowingly transport, and cause to be transported, Jane Doe 9, who had not
16 attained the age of 18 years, in interstate commerce, from Arizona to Nevada, with the
17 intent that Jane Doe 9 engage in sexual activity for which any person can be charged with
18 a criminal offense, namely, Sexual Assault, which was a criminal offense under Nevada
19 Revised Statute 200.366; and Lewdness with Child Under 16 Years, which was a criminal
20 offense under Nevada Revised Statute 201.230.

21 259. In violation of Title 18, United States Code, Sections 2423(a) and 2.

22 **COUNT 31**

23 260. The allegations contained in all preceding paragraphs are realleged and
24 incorporated herein as if fully set forth in this paragraph.

25 261. On or between August 8, 2020 and March 18, 2021, in the District of Arizona
26 and elsewhere, defendants SAMUEL RAPPYLEE BATEMAN, JOSEPHINE BARLOW
27 BISTLINE, and LADELL JAY BISTLINE, JR., and others known and unknown to the
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1 grand jury, did knowingly persuade, induce, entice, and coerce Jane Doe 8 to travel in
2 interstate commerce, back and forth between Arizona, Utah, and Nebraska, to engage in
3 sexual activity for which any person can be charged with a criminal offense, namely,
4 Sexual Conduct with a Minor, which was a criminal offense under Arizona Revised Statute
5 13-1405; Molestation of a Child, which was a criminal offense under Arizona Revised
6 Statute 13-1410; and Sexual Abuse, which was a criminal offense under Arizona Revised
7 Statute 13-1404.

8 262. In violation of Title 18, United States Code, Sections 2422(a) and 2.

9 **COUNT 32**

10 263. The allegations contained in all preceding paragraphs are realleged and
11 incorporated herein as if fully set forth in this paragraph.

12 264. On or between August 8, 2020 and September 13, 2022, in the District of
13 Arizona and elsewhere, defendants SAMUEL RAPPYLEE BATEMAN, JOSEPHINE
14 BARLOW BISTLINE, and LADELL JAY BISTLINE, JR., and others known and
15 unknown to the grand jury, did use a facility and means of interstate commerce to
16 knowingly persuade, induce, entice, and coerce Jane Doe 8, who had not attained the age
17 of 18 years, to engage in sexual activity for which any person can be charged with a
18 criminal offense, namely, Sexual Conduct with a Minor, which was a criminal offense
19 under Arizona Revised Statute 13-1405; Molestation of a Child, which was a criminal
20 offense under Arizona Revised Statute 13-1410; and Sexual Abuse, which was a criminal
21 offense under Arizona Revised Statute 13-1404.

22 265. In violation of Title 18, United States Code, Sections 2422(b) and 2.

23 **COUNT 33**

24 266. The allegations contained in all preceding paragraphs are realleged and
25 incorporated herein as if fully set forth in this paragraph.

26 267. On or between August 8, 2020 and March 18, 2021, in the District of Arizona
27 and elsewhere, defendants SAMUEL RAPPYLEE BATEMAN, JOSEPHINE BARLOW
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1 BISTLINE, and LADELL JAY BISTLINE, JR., and others known and unknown to the
2 grand jury, did knowingly transport, and cause to be transported, Jane Doe 8, who had not
3 attained the age of 18 years, in interstate commerce, back and forth between Arizona, Utah,
4 and Nebraska, with the intent that Jane Doe 8 engage in sexual activity for which any
5 person can be charged with a criminal offense, namely, Sexual Conduct with a Minor,
6 which was a criminal offense under Arizona Revised Statute 13-1405; Molestation of a
7 Child, which was a criminal offense under Arizona Revised Statute 13-1410; and Sexual
8 Abuse, which was a criminal offense under Arizona Revised Statute 13-1404.

9 268. In violation of Title 18, United States Code, Sections 2423(a) and 2.

10 **COUNT 34**

11 269. The allegations contained in all preceding paragraphs are realleged and
12 incorporated herein as if fully set forth in this paragraph.

13 270. On or between November 15, 2020 and March 2, 2021, in the District of
14 Arizona and elsewhere, defendants SAMUEL RAPPYLEE BATEMAN and LEILANI
15 BARLOW, and others known and unknown to the grand jury, did knowingly persuade,
16 induce, entice, and coerce Jane Doe 11 to travel in interstate commerce, from Colorado to
17 Arizona, to engage in sexual activity for which any person can be charged with a criminal
18 offense, namely; Sexual Conduct with a Minor, which was a criminal offense under
19 Arizona Revised Statute 13-1405; Molestation of a Child, which was a criminal offense
20 under Arizona Revised Statute 13-1410 (through October 1, 2021); Sexual Abuse, which
21 was a criminal offense under Arizona Revised Statute 13-1404 (through October 1, 2021);
22 Sexual Abuse of a Minor in the First Degree, which was a criminal offense under Wyoming
23 Statute 6-2-314; Sexual Abuse of a Minor in the Second Degree, which was a criminal
24 offense under Wyoming Statute 6-2-315; Sexual Abuse of a Minor in the Third Degree,
25 which was a criminal offense under Wyoming Statute 6-2-316; Unlawful Sexual Activity
26 with a Minor, which was a criminal offense under Utah Code 76-5-401; and Sexual Abuse
27 of a Minor, which was a criminal offense under Utah Code 76-5-401.1.

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1 271. In violation of Title 18, United States Code, Sections 2422(a) and 2.

2 **COUNT 35**

3 272. The allegations contained in all preceding paragraphs are realleged and
4 incorporated herein as if fully set forth in this paragraph.

5 273. On or between November 15, 2020 and September 13, 2022, in the District
6 of Arizona and elsewhere, defendants SAMUEL RAPPYLEE BATEMAN and LEILANI
7 BARLOW, and others known and unknown to the grand jury, did use a facility and means
8 of interstate commerce to knowingly persuade, induce, entice, and coerce Jane Doe 11,
9 who had not attained the age of 18 years, to engage in sexual activity for which any person
10 can be charged with a criminal offense, namely, Sexual Conduct with a Minor, which was
11 a criminal offense under Arizona Revised Statute 13-1405; Molestation of a Child, which
12 was a criminal offense under Arizona Revised Statute 13-1410 (through October 1, 2021);
13 Sexual Abuse, which was a criminal offense under Arizona Revised Statute 13-1404
14 (through October 1, 2021); Sexual Abuse of a Minor in the First Degree, which was a
15 criminal offense under Wyoming Statute 6-2-314; Sexual Abuse of a Minor in the Second
16 Degree, which was a criminal offense under Wyoming Statute 6-2-315; Sexual Abuse of a
17 Minor in the Third Degree, which was a criminal offense under Wyoming Statute 6-2-316;
18 Unlawful Sexual Activity with a Minor, which was a criminal offense under Utah Code
19 76-5-401; and Sexual Abuse of a Minor, which was a criminal offense under Utah Code
20 76-5-401.1.

21 274. In violation of Title 18, United States Code, Sections 2422(b) and 2.

22 **COUNT 36**

23 275. The allegations contained in all preceding paragraphs are realleged and
24 incorporated herein as if fully set forth in this paragraph.

25 276. On or between November 15, 2020 and March 2, 2021, in the District of
26 Arizona and elsewhere, defendants SAMUEL RAPPYLEE BATEMAN and LEILANI
27 BARLOW, and others known and unknown to the grand jury, did knowingly transport, and
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1 cause to be transported, Jane Doe 11, who had not attained the age of 18 years, in interstate
2 commerce, from Colorado to Arizona, with the intent that Jane Doe 11 engage in sexual
3 activity for which any person can be charged with a criminal offense, namely, Sexual
4 Conduct with a Minor, which was a criminal offense under Arizona Revised Statute 13-
5 1405; Molestation of a Child, which was a criminal offense under Arizona Revised Statute
6 13-1410 (through October 1, 2021); Sexual Abuse, which was a criminal offense under
7 Arizona Revised Statute 13-1404 (through October 1, 2021); Sexual Abuse of a Minor in
8 the First Degree, which was a criminal offense under Wyoming Statute 6-2-314; Sexual
9 Abuse of a Minor in the Second Degree, which was a criminal offense under Wyoming
10 Statute 6-2-315; Sexual Abuse of a Minor in the Third Degree, which was a criminal
11 offense under Wyoming Statute 6-2-316; Unlawful Sexual Activity with a Minor, which
12 was a criminal offense under Utah Code 76-5-401; and Sexual Abuse of a Minor, which
13 was a criminal offense under Utah Code 76-5-401.1.

14 277. In violation of Title 18, United States Code, Sections 2423(a) and 2.

15 **COUNT 37**

16 278. The allegations contained in all preceding paragraphs are realleged and
17 incorporated herein as if fully set forth in this paragraph.

18 279. On or between March 12 and March 13, 2021, in the District of Arizona and
19 elsewhere, defendant SAMUEL RAPPYLEE BATEMAN, and others known and
20 unknown to the grand jury, did knowingly transport, and cause to be transported, Jane Doe
21 11, who had not attained the age of 18 years, in interstate commerce, from Arizona to
22 Nebraska, with the intent that Jane Doe 11 engage in sexual activity for which any person
23 can be charged with a criminal offense, namely, Sexual Abuse of a Minor in the First
24 Degree, which was a criminal offense under Wyoming Statute 6-2-314; Sexual Abuse of a
25 Minor in the Second Degree, which was a criminal offense under Wyoming Statute 6-2-
26 315; and Sexual Abuse of a Minor in the Third Degree, which was a criminal offense under
27 Wyoming Statute 6-2-316.

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1 280. In violation of Title 18, United States Code, Sections 2423(a) and 2.

2 **COUNT 38**

3 281. The allegations contained in all preceding paragraphs are realleged and
4 incorporated herein as if fully set forth in this paragraph.

5 282. On or about March 2, 2022, in the District of Arizona and elsewhere,
6 defendant SAMUEL RAPPYLEE BATEMAN, and others known and unknown to the
7 grand jury, did knowingly transport, and cause to be transported, Jane Doe 11, who had not
8 attained the age of 18 years, in interstate commerce, from Arizona to Utah, with the intent
9 that Jane Doe 11 engage in sexual activity for which any person can be charged with a
10 criminal offense, namely, Unlawful Sexual Activity with a Minor, which was a criminal
11 offense under Utah Code 76-5-401; and Sexual Abuse of a Minor, which was a criminal
12 offense under Utah Code 76-5-401.1.

13 283. In violation of Title 18, United States Code, Sections 2423(a) and 2.

14 **COUNT 39**

15 284. The allegations contained in all preceding paragraphs are realleged and
16 incorporated herein as if fully set forth in this paragraph.

17 285. On or between March 15 and March 17, 2021, in the District of Arizona and
18 elsewhere, defendant SAMUEL RAPPYLEE BATEMAN, and others known and
19 unknown to the grand jury, did knowingly travel in interstate commerce, from Nebraska to
20 Arizona, for the purpose of engaging in any illicit sexual conduct, as defined in Title 18,
21 United States Code, Section 2423(f), with Jane Doe 10.

22 286. In violation of Title 18, United States Code, Sections 2423(b) and 2.

23 **COUNT 40**

24 287. The allegations contained in all preceding paragraphs are realleged and
25 incorporated herein as if fully set forth in this paragraph.

26 288. On or about January 29, 2022, in the District of Arizona and elsewhere,
27 defendant SAMUEL RAPPYLEE BATEMAN, and others known and unknown to the
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1 grand jury, did knowingly transport, and cause to be transported, Jane Doe 10, who had not
2 attained the age of 18 years, in interstate commerce, from Arizona to Colorado, with the
3 intent that Jane Doe 10 engage in sexual activity for which any person can be charged with
4 a criminal offense, namely, Sexual Assault, which was a criminal offense under Colorado
5 Revised Statute 18-3-402(1)(e); and Unlawful Sexual Contact, which was a criminal
6 offense under Colorado Revised Statute 18-3-404(1.5).

7 289. In violation of Title 18, United States Code, Sections 2423(a) and 2.

8 **COUNT 41**

9 290. The allegations contained in all preceding paragraphs are realleged and
10 incorporated herein as if fully set forth in this paragraph.

11 291. On or between September 12 and September 13, 2022, in the District of
12 Arizona and elsewhere, defendants SAMUEL RAPPYLEE BATEMAN and BRENDA
13 BARLOW, and others known and unknown to the grand jury, did knowingly transport, and
14 cause to be transported, Jane Doe 10, who had not attained the age of 18 years, in interstate
15 commerce, from Arizona to Utah, with the intent that Jane Doe 10 engage in sexual activity
16 for which any person can be charged with a criminal offense, namely, Unlawful Sexual
17 Activity with a Minor, which was a criminal offense under Utah Code 76-5-401; and
18 Sexual Abuse of a Minor, which was a criminal offense under Utah Code 76-5-401.1.

19 292. In violation of Title 18, United States Code, Sections 2423(a) and 2.

20 **COUNT 42**

21 293. The allegations contained in all preceding paragraphs are realleged and
22 incorporated herein as if fully set forth in this paragraph.

23 294. On or about August 28, 2022, in the District of Arizona, defendants
24 SAMUEL RAPPYLEE BATEMAN, BRENDA BARLOW, and TORRANCE BISTLINE,
25 and others known and unknown to the grand jury, did corruptly alter, destroy, mutilate, and
26 conceal a record, and attempted to do so, with the intent to impair its integrity and
27 availability for use in a foreseeable prosecution before a Court of the United States, an
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1 official proceeding, that is, by deleting and attempting to delete electronic communications
2 associated with Signal accounts.

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

4 **COUNT 43**

5 296. The allegations contained in all preceding paragraphs are realleged and
6 incorporated herein as if fully set forth in this paragraph.

7 297. On or about August 28, 2022, in the District of Arizona, defendants
8 SAMUEL RAPPYLEE BATEMAN, BRENDA BARLOW, and TORRANCE BISTLINE,
9 and others known and unknown to the grand jury, did knowingly and willfully conspire
10 and agree together and with each other, to corruptly alter, destroy, mutilate, and conceal a
11 record, with the intent to impair its integrity and availability for use in a foreseeable
12 prosecution before a Court of the United States, an official proceeding, that is, by deleting
13 and attempting to delete electronic communications associated with Signal accounts, in
14 violation of Title 18, United States Code, Sections 1512(c)(1) and 2.

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

16 **COUNT 44**

17 299. The allegations contained in all preceding paragraphs are realleged and
18 incorporated herein as if fully set forth in this paragraph.

19 300. On or about August 28, 2022, in the District of Arizona, defendants
20 SAMUEL RAPPYLEE BATEMAN, BRENDA BARLOW, and TORRANCE BISTLINE,
21 and others known and unknown to the grand jury, did corruptly obstruct, influence, and
22 impede a foreseeable prosecution before a Court of the United States, an official
23 proceeding, and attempted to do so, by deleting, attempting to delete, and directing others
24 to delete, electronic communications associated with Signal accounts.

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

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COUNT 45

302. The allegations contained in all preceding paragraphs are realleged and incorporated herein as if fully set forth in this paragraph.

303. On or about August 28, 2022, in the District of Arizona, defendant, SAMUEL RAPPYLEE BATEMAN, BRENDA BARLOW, and TORRANCE BISTLINE, and others known and unknown to the grand jury, did knowingly and willfully conspire and agree together and with each other, to corruptly obstruct, influence, and impede a foreseeable prosecution before a Court of the United States, an official proceeding, by deleting, attempting to delete, and directing others to delete, electronic communications associated with Signal accounts, in violation of Title 18, United States Code, Sections 1512(c)(2) and 2.

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

COUNT 46

305. The allegations contained in all preceding paragraphs are realleged and incorporated herein as if fully set forth in this paragraph.

306. On or about August 28, 2022, in the District of Arizona, 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 and proper administration of a matter that the defendant contemplated was within the jurisdiction of the Federal Bureau of Investigation, a department and agency of the United States.

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

COUNT 47

308. The allegations contained in all preceding paragraphs are realleged and incorporated herein as if fully set forth in this paragraph.

1 conceal a record, and other object, and attempted to do so, with the intent to impair its
2 integrity and availability for use in a foreseeable criminal proceeding before a Court of the
3 United States, an official proceeding, that is, by hiding potential evidence.

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

5 **COUNT 50**

6 317. The allegations contained in all preceding paragraphs are realleged and
7 incorporated herein as if fully set forth in this paragraph.

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

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

16 **COUNT 51**

17 320. The allegations contained in all preceding paragraphs are realleged and
18 incorporated herein as if fully set forth in this paragraph.

19 321. Beginning at a time unknown, but at least on or between November 26 and
20 December 1, 2022, in the District of Arizona and elsewhere, defendants SAMUEL
21 RAPPYLEE BATEMAN, NAOMI BISTLINE, DONNAE BARLOW, MORETTA ROSE
22 JOHNSON, and BRENDA BARLOW, and others known and unknown to the grand jury,
23 did knowingly and willfully conspire and agree together and with each other, to corruptly
24 obstruct, influence, and impede a foreseeable prosecution before a Court of the United
25 States, an official proceeding, by aiding minors to escape Arizona Department of Child
26 Safety custody and evade law enforcement, in violation of Title 18, United States Code,
27 Sections 1512(c)(2) and 2.

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1 transported the victims in interstate commerce from Arizona to Washington, and used a
2 means, facility, and instrumentality of interstate commerce, in violation of Title 18, United
3 States Code, Sections 1201(a)(1), (b), and 2.

4 **Overt Acts**

5 328. In furtherance of the conspiracy and to effect the objects of the conspiracy,
6 the following overt acts, among others, were committed in the District of Arizona and
7 elsewhere:

8 329. On or about November 26, 2022, defendant BRENDA BARLOW messaged
9 Jane Doe 7 on behalf of defendant SAMUEL RAPPYLEE BATEMAN to ask Jane Doe 7
10 to pass a message to the other minor female victims reminding them that defendant
11 BATEMAN was still in custody and not to give up on him.

12 330. On or about November 27, 2022, defendant SAMUEL RAPPYLEE
13 BATEMAN made a recorded video call from the Core Civic/Central Arizona Florence
14 Correctional Complex (“CAFCC”), where he was in federal custody, to defendant NAOMI
15 BISTLINE, and they discussed their need for additional vehicles. Defendant BISTLINE
16 said they needed ten more seats for car seats and luggage. Defendant BATEMAN told her
17 not to be afraid to get the white trailer and bring it down. Defendant BATEMAN instructed
18 defendant BISTLINE to take two vehicles so the babies could be kept separate, to keep the
19 babies together in one vehicle, and to keep the vehicles separated by 1,000 feet.

20 331. On or about November 27, 2022, defendants NAOMI BISTLINE and
21 DONNAE BARLOW picked up Jane Doe 3 and Jane Doe 4, without permission from AZ
22 DCS. Individual 8 communicated with defendant SAMUEL RAPPYLEE BATEMAN to
23 keep him updated on defendants BISTLINE and BARLOW’s progress. In a recorded video
24 call, defendant BATEMAN told Jane Doe 3 and Jane Doe 4 that they belonged to him and
25 to plan on being delivered that night. When defendants BISTLINE and BARLOW reached
26 their destination and pulled the car over, defendant BATEMAN instructed them to “stay a
27 ways away.”

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1 332. On or about November 27, 2022, defendant BRENDA BARLOW helped
2 defendant MORETTA ROSE JOHNSON choose a vehicle to transport the minor female
3 victims, by specifically suggesting she take the Range Rover because they thought the
4 4Runner was being tracked by the government.

5 333. On or about November 27, 2022, defendant BRENDA BARLOW gave
6 defendant MORETTA ROSE JOHNSON \$200 cash to help transport the minor female
7 victims. Defendant BARLOW also asked Individual 10 to send more money to defendant
8 JOHNSON using CashApp.

9 334. On or about November 27, 2022, defendant SAMUEL RAPPYLEE
10 BATEMAN instructed defendant MORETTA ROSE JOHNSON in recorded video calls
11 to speak in code as they discussed transporting the minor female victims. Defendant
12 BATEMAN instructed defendant JOHNSON to go “way out and around somewhere” and
13 to stay off the freeways. Defendant BATEMAN instructed Jane Doe 10 (who was with
14 defendant JOHNSON) to contact “Dakota” (a code name for defendant TORRANCE
15 BISTLINE) if they needed help – Jane Doe 10 later did so. Defendant BATEMAN also
16 instructed them to park in a residential area and not in a parking lot if things “get tight.”

17 335. On or about November 27, 2022, defendant SAMUEL RAPPYLEE
18 BATEMAN instructed defendant NAOMI BISTLINE in a recorded video call to contact
19 defendant MORETTA ROSE JOHNSON and tell her to stay in a motel that night with the
20 minor female victims.

21 336. On or about November 27, 2022, defendant SAMUEL RAPPYLEE
22 BATEMAN instructed defendant BRENDA BARLOW in a recorded phone call not to
23 provide personal information about their family to others.

24 337. Later, on or about November 27, 2022, defendants NAOMI BISTLINE,
25 DONNAE BARLOW, and MORETTA ROSE JOHNSON, assisted eight of the nine minor
26 female victims (three of them under the age of 14) to leave the custody of the AZ DCS
27 group homes in which they were staying pending delinquency proceedings following the
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1 September 13, 2022 arrest of defendant SAMUEL RAPPYLEE BATEMAN, and their
2 Court Authorized Removals.

3 338. Specifically, defendants NAOMI BISTLINE and DONNAE BARLOW
4 picked up minor victims Jane Doe 8, Jane Doe 9, and Jane Doe 7 after they left AZ DCS
5 custody on or about November 27, 2022.

6 339. Defendant MORETTA ROSE JOH.NSON picked up minor victims Jane
7 Doe 3, Jane Doe 4, Jane Doe 5, Jane Doe 10, and Jane Doe 11 after they left AZ DCS
8 custody on or about November 27, 2022.

9 340. On the evening of November 27, 2022, defendant SAMUEL RAPPYLEE
10 BATEMAN made a recorded video call to defendant DONNAE BARLOW. During the
11 video call, defendant BARLOW was driving a vehicle and defendant NAOMI BISTLINE
12 was the front-seat passenger. Defendant BISTLINE informed defendant BATEMAN that
13 they had Jane Doe 8 and Jane Doe 9, referenced by code names.

14 341. On or between November 27, 2022 and December 1, 2022, defendant
15 BRENDA BARLOW communicated with and between defendant SAMUEL RAPPYLEE
16 BATEMAN and others to ascertain the status of the minor female victims and to coordinate
17 with and provide updates to defendant BATEMAN.

18 342. On the morning of November 28, 2022, defendant SAMUEL RAPPYLEE
19 BATEMAN made a recorded video call to defendant NAOMI BISTLINE, who appeared
20 to be in a hotel room. In response to defendant BATEMAN's questioning about who was
21 with them, defendant BISTLINE told defendant BATEMAN that "W2" (a reference to
22 Jane Doe 6, the one of nine girls to have not escaped from AZ DCS custody) was the only
23 one not with them, but that they had tried and ran for their lives after police were called.
24 Defendant BATEMAN told them they needed to get W2. The video panned to all eight
25 minors taken from AZ DCS custody.

26 343. On or about November 28, 2022, defendant NAOMI BISTLINE was
27 attempting to ascertain Jane Doe 6's location.

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1 344. On or about November 28, 2022, defendant SAMUEL RAPPYLEE
2 BATEMAN instructed defendant DONNAE BARLOW in a recorded video call to never
3 let anybody know that she was with the minor female victims.

4 345. On or about November 28, 2022, defendant SAMUEL RAPPYLEE
5 BATEMAN instructed defendant BRENDA BARLOW in a recorded video call not to
6 reveal her location to anyone else.

7 346. In the following days, defendant SAMUEL RAPPYLEE BATEMAN made
8 numerous video calls to defendant NAOMI BISTLINE and the missing girls. At one point,
9 defendant BATEMAN asked if they were in “our state,” and they said they were not. At
10 another point, defendant BATEMAN asked where they were and if they were several
11 hundred miles away. When he received an affirmative answer, defendant BATEMAN
12 responded, “Okay, wonderful.”

13 347. On or about November 28, 2022, defendant SAMUEL RAPPYLEE
14 BATEMAN made video calls to defendant MORETTA ROSE JOHNSON’s phone, where
15 he spoke with defendant MARONA JOHNSON, who appeared to be in a hotel room with
16 a baby and at least one other adult wife of defendant BATEMAN. They talked about being
17 a long way away. Defendant BATEMAN encouraged defendant MARONA JOHNSON
18 to stay positive.

19 348. After discussions about needing more vehicles, on another recorded call on
20 or about the evening of November 28, 2022, defendant LEILANI BARLOW reported to
21 defendant SAMUEL RAPPYLEE BATEMAN that she had cleaned out one of the vehicles
22 and she and defendant JOSEPHINE BARLOW BISTLINE were able to swap out vehicles
23 with the other wives of defendant BATEMAN.

24 349. On or about November 29, 2022, defendant TORRANCE BISTLINE offered
25 to help the defendants and others in a recorded video call.

26 350. On or about November 29, 2022, defendant SAMUEL RAPPYLEE
27 BATEMAN told defendants NAOMI BISTLINE and DONNAE BARLOW in a recorded
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1 video call that he only wanted to communicate using video calls, because video calls use
2 the internet and not phone lines, and the government can find people using phone lines.

3 351. On or about November 29, 2022, Individual 10 transferred \$600 to defendant
4 MORETTA ROSE JOHNSON using CashApp.

5 352. On or between November 27 and November 30, 2022, Individual 8
6 transferred \$900 to defendant MORETTA ROSE JOHNSON using CashApp.

7 353. On or about December 1, 2022, defendant MORETTA ROSE JOHNSON
8 had all eight missing girls in an AirBnB in Spokane, Washington, paid for by one of
9 defendant SAMUEL RAPPYLEE BATEMAN's followers. Defendant JOHNSON refused
10 to answer the door for a Spokane Sheriff's Sergeant. Later, the sergeant stopped defendant
11 JOHNSON in a vehicle, attempting to drive away with all eight missing girls.

12 354. All in violation of Title 18, United States Code, Section 1201(c).

13 **COUNT 54**

14 355. The allegations contained in all preceding paragraphs are realleged and
15 incorporated herein as if fully set forth in this paragraph.

16 356. On or between November 17 and November 26, 2022, in the District of
17 Arizona and elsewhere, defendants SAMUEL RAPPYLEE BATEMAN and NAOMI
18 BISTLINE, and others known and unknown to the grand jury, did corruptly obstruct,
19 influence, and impede a criminal prosecution before a Court of the United States, an official
20 proceeding, and attempted to do so, by harassing and threatening known cooperating
21 government witnesses.

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

23 **COUNT 55**

24 358. The allegations contained in all preceding paragraphs are realleged and
25 incorporated herein as if fully set forth in this paragraph.

26 359. On or between November 17 and November 26, 2022, in the District of
27 Arizona and elsewhere, defendants SAMUEL RAPPYLEE BATEMAN and NAOMI
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1 BISTLINE, and others known and unknown to the grand jury, did knowingly and willfully
2 conspire and agree together and with each other, to corruptly obstruct, influence, and
3 impede a criminal prosecution before a Court of the United States, an official proceeding,
4 and attempted to do so, by harassing and threatening known cooperating government
5 witnesses, in violation of Title 18, United States Code, Sections 1512(c)(2) and 2.

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

7 **COUNT 56**

8 361. The allegations contained in all preceding paragraphs are realleged and
9 incorporated herein as if fully set forth in this paragraph.

10 362. On or between March 15 and March 24, 2023, in the District of Arizona and
11 elsewhere, defendant SAMUEL RAPPYLEE BATEMAN, and others known and
12 unknown to the grand jury, did knowingly attempt to intimidate, and corruptly persuade
13 Jane Doe 3, Jane Doe 4, Jane Doe 5, Jane Doe 6, Jane Doe 7, Jane Doe 8, Jane Doe 9, Jane
14 Doe 10, Jane Doe 11, and others, by instructing them, and having them instructed, not to
15 speak with anyone about a pending federal investigation and prosecution, with the intent
16 to influence, delay, and prevent the testimony of Jane Doe 3, Jane Doe 4, Jane Doe 5, Jane
17 Doe 6, Jane Doe 7, Jane Doe 8, Jane Doe 9, Jane Doe 10, Jane Doe 11, and others, in a
18 criminal proceeding before a Court of the United States, an official proceeding.

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

20 **COUNT 57**

21 364. The allegations contained in all preceding paragraphs are realleged and
22 incorporated herein as if fully set forth in this paragraph.

23 365. On or about March 24, 2023, in the District of Arizona and elsewhere,
24 defendant JOSEPHINE BARLOW BISTLINE did knowingly transmit in interstate and
25 foreign commerce a communication containing a knowing, willful, and reckless threat to
26 injure the person of another: to wit, the defendant sent an electronic mail communication
27 threatening to injure and harm C.B.

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366. In violation of Title 18, United States Code, Section 875(c).

COUNT 58

367. The allegations contained in all preceding paragraphs are realleged and incorporated herein as if fully set forth in this paragraph.

368. On or between December 16, 2022 and March 24, 2023, in the District of Arizona and elsewhere, defendant JOSEPHINE BARLOW BISTLINE, with the intent to injure, harass, and intimidate another person, used any interactive computer service and electronic communication service and electronic communication system of interstate commerce, and any other facility of interstate and foreign commerce, to engage in a course of conduct that caused, attempted to cause and would reasonably have been expected to cause substantial emotional distress to C.B. and L.B., and placed C.B. and L.B. in reasonable fear of serious bodily injury.

369. In violation of Title 18, United States Code, Sections 2261A(2) and 2261(b).

COUNT 59

370. The allegations contained in all preceding paragraphs are realleged and incorporated herein as if fully set forth in this paragraph.

371. On or between November 30, 2022 and March 24, 2023, in the District of Arizona and elsewhere, defendant JOSEPHINE BARLOW BISTLINE, did attempt to corruptly obstruct, influence, and impede a criminal prosecution before a Court of the United States, an official proceeding, by harassing and threatening Arizona state government employees.

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

FORFEITURE ALLEGATION

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2 373. The allegations contained in all preceding paragraphs are realleged and
3 incorporated herein as if fully set forth in this paragraph.

4 374. The Grand Jury realleges and incorporates the allegations of Counts 1
5 through 59 of this Third Superseding Indictment, which are incorporated by reference as
6 though fully set forth herein.

7 375. Pursuant to 18 U.S.C. §§ 981, 2253, and 2428, 21 U.S.C. § 853, and 28
8 U.S.C. § 2461(c), and upon conviction of the offenses alleged in Counts 1 through 59 of
9 the Third Superseding Indictment, the defendant shall forfeit to the United States of
10 America all right, title, and interest in (a) any property constituting, or derived from, any
11 proceeds the persons obtained, directly or indirectly, as the result of the offense, and (b)
12 any of the defendant's property used, or intended to be used, in any manner or part, to
13 commit, or to facilitate the commission of, such offense as to which property the defendants
14 is liable. If any forfeitable property, as a result of any act or omission of the defendant:

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

21 it is the intent of the United States to seek forfeiture of any other property of said
22 defendant up to the value of the above-described forfeitable property, pursuant to 21 U.S.C.
23 § 853(p).

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1 All in accordance with 18 U.S.C. §§ 981, 2253, and 2428, 21 U.S.C. § 853, 28
2 U.S.C. § 2461(c), and Rule 32.2, Federal Rules of Criminal Procedure.

3
4 A TRUE BILL

5 *S/*

6 FOREPERSON OF THE GRAND JURY
7 Date: January 24, 2024

8 GARY M. RESTAINO
9 United States Attorney
District of Arizona

10 *S/*

11 DIMITRA H. SAMPSON
12 JILLIAN BESANCON
13 RYAN POWELL
Assistant U.S. Attorneys