

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**1. TONKA WAY CON PONDER,**

[DOB: 10/04/1970],

**2. TRETCH LUCIUS LAWRENCE,**

a/k/a "Travis Dewain Shankle"

[DOB: 03/29/1976],

**3. KEITH DEWAYNE NOLEN,**

a/k/a "Seg"

[DOB: 07/10/1989],

**4. PAUL LEON GARDNER,**

[DOB: 11/11/1971],

**5. DANIEL SCOTT KURTZEBORN,**

[DOB: 09/26/1982],

**6. ROBERT RUSSELL WARREN,**

a/k/a "Russ"

[DOB: 04/17/1969], and

**7. CAROLYNN L. PONDER,**

[DOB: 03/04/1977],

Defendants.

Case No. \_\_\_\_\_

**COUNT 1, 3, and 5**

*Violent Crime in the Aid of Racketeering*

18 U.S.C. § 1959(a)(3)

NMT 20 Years' Imprisonment

NMT \$250,000 fine

NMT 3 years' supervised release

Class C felony

**COUNT 2 and 7**

*Violent Crime in the Aid of Racketeering*

18 U.S.C. § 1959(a)(6)

NMT 3 Years' Imprisonment

NMT \$250,000 fine

NMT 3 Years' Supervised Release

Class E felony

**COUNTS 4, 6, and 8**

*Discharge of a Firearm in Furtherance of a  
Crime of Violence*

18 U.S.C. § 924(c)(1)(A)(iii)

NLT 10 Years' Imprisonment

NMT Life Imprisonment (consecutive to any  
other sentence)

NMT \$250,000 fine

NMT 5 Years' Supervised Release

Class A felony

**COUNT 9**

*Attempted Hobbs Act Extortion*

18 U.S.C § 1951(a)

NMT 20 Years' Imprisonment

NMT \$250,000 fine

NMT 3 Years' Supervised Release

Class C felony

**COUNT 10**

*Conspiracy to Distribute 5 Grams or more of  
Methamphetamine (actual)*

21 U.S.C. §§ 841(a)(1), (b)(1)(B) and 846

NMT 40 Years' Imprisonment

NLT 5 Years' Imprisonment

NMT \$5,000.000.00  
NLT 3 Years' Supervised Release  
Class B felony

**COUNTS 11-12**

*Distribution of 50 Grams or More of Methamphetamine (actual)*  
21 U.S.C. §§ 841(a)(1) and (b)(1)(A)  
NMT Life Imprisonment  
NLT 20 Years' Imprisonment  
NMT \$10,000,000.00 fine  
NLT 5 Years' Supervised Release  
Class A felony

**COUNTS 13-15**

*Distribution of 5 Grams or more of Methamphetamine (actual)*  
21 U.S.C. §§ 841(a)(1) and (b)(1)(B)  
NMT 40 Years' Imprisonment  
NLT 5 Years' Imprisonment  
NMT \$5,000.000.00  
NLT 3 Years' Supervised Release  
Class B felony

**COUNT 16**

*Possession of a Firearm in Furtherance of a Drug Trafficking Crime*  
18 U.S.C. §§ 924(c)(1)(A)(i) and 2  
NLT 5 Years' Imprisonment  
NMT Life Imprisonment (consecutive to any other sentence) or  
NLT 25 years' Imprisonment (consecutive) for second or subsequent conviction  
NMT \$250,000 fine  
NMT 5 years' supervised release  
Class A felony

**COUNTS 17-19**

*Use of a Communications Facility to Facilitate Drug Trafficking Offense*  
21 U.S.C. § 843(b)  
NMT 4 Years' Imprisonment  
NMT \$250,000 Fine  
NMT 2 Years' Supervised Release  
Class E felony

**COUNTS 20-23***Interstate Travel in Aid of Racketeering*

18 U.S.C. § 1952(a)(3)

NMT 5 Years' Imprisonment

NMT \$250,000.00 fine

NMT 3 Years' Supervised Release

Class D felony

**COUNT 24***Felon in Possession of a Firearm*

18 U.S.C. §§ 922(g)(1) and 924(a)(8)

NMT 10 Years' Imprisonment

NMT \$250,000 fine

NMT 3 Years' Supervised Release

Class C felony

**COUNT 25***Felon in Possession of a Firearm*

18 U.S.C. §§ 922(g)(1) and 924(a)(8)

NMT 15 Years' Imprisonment

NMT \$250,000 fine

NMT 3 Years' Supervised Release

Class C felony

\$100 Special Assessment, Each Count

DEFENDANT NO.	DEFENDANT NAME	COUNTS CHARGED
1	Tonka Way Con Ponder	1-6, 9-16, and 18-23
2	Tretch Lucius Lawrence	1, 2, and 9
3	Keith Dewayne Nolen, Jr.	1, 2, and 25
4	Paul Leon Gardner	1
5	Daniel SCOTT Kurtzeborn	1, 2, 7-8, and 24
6	Robert Russell Warren	10
7	Carolynn L. Ponder	10 and 17

# AMENDED INDICTMENT

## THE GRAND JURY CHARGES THAT:

### COUNT 1

(Violent Crimes in Aid of Racketeering)

18 U.S.C. § 1959(a)(3)

#### Introduction

1. The Galloping Goose Motorcycle Club (hereinafter “Galloping Goose”) was a motorcycle club formed in Los Angeles, California in 1942. The Galloping Goose identifies as a “1%” outlaw motorcycle club.

2. The Galloping Goose is comprised of smaller units called “chapters.” The Galloping Goose have “chapters” throughout the United States to include California, Missouri, and Louisiana. The Galloping Goose have local “chapters” within the individual states.

3. The Galloping Goose have historically aligned with the El Forastero Motorcycle Club.

4. The Mongols Motorcycle Club (hereinafter “Mongols”) is a rival motorcycle club with the Galloping Goose.

5. The Iron Celtics was a motorcycle association operating in the Lake of the Ozarks area. It was formed in 2015 as a not-for-profit organization under the laws of Missouri and the United States, with the purpose of supporting various charities and groups in the Lake of the Ozark area.

#### The Enterprise

6. At all times relevant to this Indictment, in the Western District of Missouri and elsewhere, **TONKA WAY CON PONDER, TRETCH LUCIUS LAWRENCE (a.k.a. “TRAVIS DEWAIN SHANKLE”), KEITH DEWAYNE NOLEN, JR. (a.k.a. “SEG”), PAUL L. GARDNER, and DANIEL SCOTT KURTZEBORN**, the defendants, and others known and

unknown to the Grand Jury, were members and associates of an organized criminal enterprise called the Galloping Goose. Through its leadership, membership, and associates, the Galloping Goose engaged in acts of violence, including assault, attempted robbery, and extortion.

7. The Galloping Goose identifies itself by the colors of purple and gold, worn by its members' articles of clothing or patches. The Galloping Goose also identifies itself through the number "77" with the individual "7" representing the seventh letter in the alphabet ("G") and "77" representing "GG" or Galloping Goose. The Galloping Goose identifies its status as a "1%" outlaw motorcycle club by wearing a diamond-shaped patch worn on motorcycle vests (a.k.a. "cut"). The term "1%" came from the American Motorcycle Association who claimed 99% of motorcycle riders are law abiding and 1% are outlaws. Certain motorcycle clubs adopted this symbol within the motorcycle community to signal that they are the "1%" outlaws.

8. The Galloping Goose established itself in the State of Missouri in the 1950s. In the state of Missouri, there are "chapters" in the Lake of the Ozark area, Springfield, Kansas City, and St. Louis. Each local "chapter" controls a geographical area. Any motorcycle club or association wishing to operate in the Galloping Goose controlled area and display club insignia on motorcycle vests (a.k.a. "cut") must get approval from the Galloping Goose and support the Galloping Goose. Those clubs that do not support the Galloping Goose Motorcycle Club, Lake of the Ozarks Chapter will be subjected to harassment and assaults by Galloping Goose Motorcycle Club, Lake of the Ozarks Chapter, and its support clubs.

9. Local chapters of the Galloping Goose often have local motorcycle clubs directly support the Galloping Goose. The Galloping Goose, Lake of the Ozark Chapter has the Midwest Drifter's Motorcycle Club (hereinafter "Midwest Drifters") as a direct support club. The Midwest Drifters shows its direct support to the Galloping Goose by wearing the same colors as the Galloping Goose, purple and gold. Given the Galloping Goose is a "1%" outlaw motorcycle club,

Midwest Drifters members, through their support of the Galloping Goose, will often be allowed to move up and join the Galloping Goose.

10. The Galloping Goose, Lake of the Ozarks Chapter has other motorcycle associations which support it to include the Sabres Motorcycle Riding Club and the Bush Pilots Motorcycle Club.

11. It is expected that motorcycle clubs operating in the area controlled by the Galloping Goose, Lake of the Ozarks Chapter attend monthly meetings at a clubhouse controlled by the Galloping Goose and Midwest Drifters in Camdenton, Missouri. The meeting is headed by the Galloping Goose or the Midwest Drifters. The clubs will discuss various activities in which each club is engaged.

12. Individuals wishing to join the Galloping Goose go through a probationary period, in which the member is called a “prospect.” That individual will wear a patch signifying that member is a “prospect” on his motorcycle vest (a.k.a. “cut”). If the Galloping Goose approves, the “prospect” is allowed to be full member of the Galloping Goose which is termed “patching in.” The Galloping Goose is a male-only organization. Individuals that are current or prior law enforcement officers are prohibited from joining the Galloping Goose.

13. Defendant **TONKA WAY CON PONDER** was the leader of the Galloping Goose, Lake of the Ozarks Chapter, who directed other members and associates of the Galloping Goose in carrying out unlawful and other activities.

14. At all relevant times, the Galloping Goose, including its leadership, membership, and associates, constituted an “enterprise,” as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact that engaged in and activities of which affected, interstate commerce. The Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the

Enterprise.

Purposes of the Enterprise

15. The purposes of the Galloping Goose included, but were not limited to, the following:

- 15.1. Preserving, explaining, and protecting the power, territory, and prestige of the Galloping Goose through use of intimidation, violence, and threats of violence.
- 15.2. Promoting and enhancing the Galloping Goose and its members and associates activities;
- 15.3. Confronting and retaliating against rival motorcycle clubs through the use of intimidation, violence, threats of violence, and assault;
- 15.4. Exploiting other motorcycle associations through the use of intimidation, violence, and threats of violence; and
- 15.5. Confronting and retaliating against motorcycle associations that do not support the Galloping Goose through the use of intimidation, violence, threats of violence, and assaults.

Means and Methods of the Enterprise

16. Among the means and methods by which the members and associates of the Galloping Goose conducted and participated in the conduct of the affairs of the Galloping Goose included the following:

- 16.1. Leaders, members and associates of the Galloping Goose used intimidation, violence and threats of violence, including assault to preserve, expand and protect the enterprise's territory;
- 16.2. Leaders, members and associates of the Galloping Goose used intimidation,

violence and threats of violence, including assaults, to promote and enhance its prestige, reputation, and position in the community;

16.3. Leaders, members and associates of the Galloping Goose promoted a climate of fear through intimidation, violence, and threats of violence;

16.4. Leaders, members and associates of the Galloping Goose used intimidation, violence, and threats of violence, including assault against known and suspected members of rival motorcycle clubs and against those who challenged the Galloping Goose, including its members and associates; and

16.5. Leaders, members and associates of the Galloping Goose used intimidation, violence, and threats of violence, including assault and extortion, against motorcycle clubs and associations to maintain control of those motorcycle clubs and associations.

17. The Galloping Goose, through its members and associates, engaged in racketeering activity as defined by Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely acts and threats involving attempted robbery chargeable under Missouri law and punishable by imprisonment for more than one year in violation of Missouri Revised Statutes, Sections 562.012, 562.014, 562.041 and 570.023; and acts indictable under Title 18, United States Code, Section 1951 (relating to interference with commerce, robbery, or extortion).

18. On or about December 12, 2020, in the County of Camden, Western District of Missouri, **TONKA WAY CON PONDER, TRETCH LUCIUS LAWRENCE a.k.a. TRAVIS DEWAIN SHANKLE, KEITH DEWAYNE NOLEN, JR. a.k.a. "SEG", DANIEL SCOTT KURTZEBORN, and PAUL GARDNER**, and others known and unknown to the Grand Jury, for the purpose of gaining entrance to and maintaining and increasing position in the Galloping Goose, an enterprise engaged in racketeering activity, did knowingly and intentionally assault Victim 2



with a deadly weapon, and did aid and abet the same, in violation of Missouri Revised Statutes, Sections 562.041 and 565.052(2); all in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

**COUNT 2**  
(Violent Crimes in Aid of Racketeering)  
(18 U.S.C. § 1959(a)(6))

19. Paragraphs 1 through 17 of this Indictment are re-alleged and incorporated by reference as though set forth fully herein.

20. On or about July 15, 2021, in the Western District of Missouri and elsewhere, **TONKA WAY CON PONDER, TRETCH LUCIUS LAWRENCE a.k.a. TRAVIS DEWAIN SHANKLE, KEITH DEWAYNE NOLEN, JR. a.k.a. “SEG”, and DANIEL SCOTT KURTZEBORN**, the defendants, and others known and unknown to the Grand Jury, for the purpose of gaining entrance to and maintaining and increasing position in the Galloping Goose, an enterprise engaged in racketeering activity, did knowingly and intentionally combine, conspire, confederate, and agree with each other to commit assault resulting in serious physical injury of members of the Mongols and Iron Celtics Motorcycle Association in violation of Missouri Revised Statutes, Sections 562.014 and 565.050; all in violation of Title 18, United States Code, Section 1959(a)(6).

**COUNT 3**  
(Violent Crimes in Aid of Racketeering)  
(18 U.S.C. § 1959(a)(3))

21. Paragraphs 1 through 17 of this Indictment are re-alleged and incorporated by reference as though set forth fully herein.

22. On or about July 15, 2021, in the Western District of Missouri and elsewhere, **TONKA WAY CON PONDER**, the defendant, for the purpose of gaining entrance to and maintaining and increasing position in the Galloping Goose, an enterprise engaged in racketeering

activity, did knowingly and intentionally assault another person, Victim 1, by shooting Victim 1 resulting in serious physical injury to Victim 1, in violation of Missouri Revised Statutes, Section 565.050; all in violation of Title 18, United States Code, Section 1959(a)(3).

**COUNT 4**

(Discharge of a Firearm in Furtherance of a Crime of Violence)  
(18 U.S.C. § 924(c))

23. On or about July 15, 2021, in Miller County, in the Western District of Missouri, and elsewhere, **TONKA WAY CON PONDER**, the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, assault resulting serious bodily injury in aid of racketeering, as charged in Count 3 of this Indictment, did knowingly use, carry, and discharge a firearm; all in violation of Title 18, United States Code, Section 924(c)(1)(A)(iii).

**COUNT 5**

(Violent Crimes in Aid of Racketeering)  
(18 U.S.C. § 1959(a)(3))

24. Paragraphs 1 through 17 of this Indictment are re-alleged and incorporated by reference as though set forth fully herein.

25. On or about July 15, 2021, in the Western District of Missouri and elsewhere, **TONKA WAY CON PONDER**, the defendant, for the purpose of gaining entrance to and maintaining and increasing position in the Galloping Goose, an enterprise engaged in racketeering activity, did knowingly and intentionally assault Victim 2 with a deadly weapon, that is a firearm, by shooting Victim 2, in violation of Missouri Revised Statutes, Section 565.052(2); all in violation of Title 18, United States Code, Section 1959(a)(3).

**COUNT 6**  
(Discharge of a Firearm in Furtherance of a Crime of Violence)  
(18 U.S.C. § 924(c))

26. On or about July 15, 2021, in Miller County, in the Western District of Missouri, and elsewhere, **TONKA WAY CON PONDER**, the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, assault with a dangerous weapon in aid of racketeering, as charged in Count 5 of this Indictment, did knowingly use, carry, and discharge a firearm; all in violation of Title 18, United States Code, Section 924(c)(1)(A)(iii).

**COUNT 7**  
(Violent Crimes in Aid of Racketeering)  
(18 U.S.C. § 1959(a)(6))

27. Paragraphs 1 through 17 of this Indictment are re-alleged and incorporated by reference as though set forth fully herein.

28. On or about July 15, 2021, in the Western District of Missouri and elsewhere, **DANIEL SCOTT KURTZEBORN**, the defendant, for the purpose of gaining entrance to and maintaining and increasing position in the Galloping Goose, an enterprise engaged in racketeering activity, attempted to assault Victim 2 with a deadly weapon, that is a firearm, by shooting at Victim 2, in violation of Missouri Revised Statutes, Section 565.052(2); all in violation of Title 18, United States Code, Section 1959(a)(6).

**COUNT 8**  
(Discharge of a Firearm in Furtherance of a Crime of Violence)  
(18 U.S.C. § 924(c))

29. On or about July 15, 2021, in Miller County, in the Western District of Missouri, and elsewhere, **DANIEL SCOTT KURTZEBORN**, the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, assault with a dangerous weapon in aid of racketeering, as charged in Count 7 of this Indictment, did

knowingly use, carry, and discharge a firearm; all in violation of Title 18, United States Code, Sections 924(c)(1)(A)(iii).

**COUNT 9**  
(Attempted Hobbs Act Extortion)  
18 U.S.C. § 1951(a)

30. Between on or about July 1, 2020 through on or about July 15, 2021, in Miller County and Camden County, in the Western District of Missouri, **TONKA WAY CON PONDER** and **TRETCH LUCIUS LAWRENCE a.k.a. TRAVIS DEWAIN SHANKLE**, the defendants, aiding and abetting each other and others known and unknown to the grand jury, did attempt to obstruct, delay and affect commerce and the movement of articles and commodities in commerce by extortion, as those terms are defined by Title 18, United States Code, Section 1951, that is, **TONKA WAY CON PONDER**, and **TRETCH LUCIUS LAWRENCE a.k.a. TRAVIS DEWAIN SHANKLE**, attempted to obtain the property of the Iron Celtics Motorcycle Association with Iron Celtics Motorcycle Association's consent induced by wrongful use and threatened use of force, violence, and fear; all in violation of Title 18, United States Code, Sections 1951 and 2.

**COUNT 10**  
(Conspiracy to Distribute 5 grams or More of Methamphetamine (actual))  
21 U.S.C. § 846

31. From on or about August 1, 2022, through on or about October 31, 2022, in Camden and Miller Counties, in the Western District of Missouri, and elsewhere, the defendants, **TONKA WAY CON PONDER**, **CAROLYNN L. PONDER**, and **ROBERT RUSSELL WARREN**, knowingly and intentionally combined, conspired and agreed with each other and with others, known and unknown to the Grand Jury, to distribute 5 grams or more of methamphetamine (actual), a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B); all in violation of Title 21, United States Code, Section

846.

**COUNTS 11 and 12**

(Distribution of 50 Grams or More of Methamphetamine (actual))  
21 U.S.C. §§ 841(a)(1) and (b)(1)(A)

32. On or about the dates and locations set forth below in each individual count, in the Western District of Missouri, the defendant, **TONKA WAY CON PONDER**, knowingly and intentionally distributed 50 grams or more of methamphetamine (actual), a Schedule II controlled substance:

<u>COUNT</u>	<u>Date</u>	<u>Location</u>
11	October 11, 2022	Camden County, Missouri
12	July 13, 2023	Benton County, Missouri

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

**COUNTS 13 through 15**

(Distribution of 5 Grams or More of Methamphetamine (actual))  
(21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

33. On or about the dates and locations set forth below in each individual count, in the Western District of Missouri, the defendant, **TONKA WAY CON PONDER**, knowingly and intentionally distributed 5 grams or more of methamphetamine (actual), a Schedule II controlled

substance:

<u>COUNT</u>	<u>Date</u>	<u>Location</u>
13	June 27, 2023	Benton County, Missouri
14	July 25, 2023	Benton County, Missouri
15	August 11, 2023	Jackson County, Missouri

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

**COUNT 16**

(Possession of a Firearm in Furtherance  
Of a Drug Trafficking Crime)  
18 U.S.C. § 924(c)(1)(A)(i)

34. On or about June 27, 2023, within Benton County, in the Western District of Missouri, the defendant, **TONKA WAY CON PONDER**, knowingly possessed a firearm, that is, a 1911 style handgun with the word “MFer” on the grip of the firearm, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is distribution of methamphetamine as charged in Count 13 of this Indictment; all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

**COUNT 17**

(Use of a Communications Facility to Facilitate a Drug Trafficking Conspiracy)  
21 U.S.C. § 843(b)

35. On or about October 28, 2022, in the Western District of Missouri, the defendant, **CAROLYNN L. PONDER**, knowingly and intentionally used a communications facility, that is, a cellular telephone, to facilitate the commission of any act or acts constituting a felony under Title 21, United States Code, Sections 846, that is, the conspiracy to distribute methamphetamine as charged in Count 10 of this Indictment; all in violation of Title 21, United States Code, Section 843(b).

**COUNTS 18 and 19**

(Use of a Communications Facility to Facilitate a Drug Trafficking Conspiracy)  
21 U.S.C. § 843(b)

36. On or about the dates and locations set forth below in each individual count, in the Western District of Missouri, and elsewhere, the defendant, **TONKA WAY CON PONDER**, knowingly and intentionally used a communications facility, that is, a cellular telephone, to facilitate the commission of any act or acts constituting a felony under Title 21, United States Code, Section 841(a)(1) that is, the distribution of methamphetamine as charged in Counts 12 and 13 of this Indictment, as set forth below:

<u>Count</u>	<u>Date</u>	<u>Location</u>
18	June 27, 2023	<b>Hickory County, Western District of Missouri</b>
19	July 13, 2023	<b>Hickory County, Western District of Missouri</b>

All in violation of Title 21, United States Code, Section 843(b).

**COUNTS 20 through 23**

(Interstate Travel in Aid of Racketeering)  
18 U.S.C. § 1952(a)(3)

37. On or about the dates set forth below in each individual count, within Camden and Greene Counties, in the Western District of Missouri, and elsewhere, the defendant, **TONKA WAY CON PONDER** traveled in interstate commerce as set forth in each individual count, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is, distribution of methamphetamine in violation of Title 21, United States Code, Section 841(a)(1), and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity:

<u>Count</u>	<u>Date(s)</u>	<u>Travel in Interstate Commerce</u>
20	June 26, 2023	Drove from Hickory County, Missouri to Wichita, Kansas
21	July 12, 2023	Drove from Hickory County, Missouri to Wichita, Kansas
22	August 9, 2023	Drove from Hickory County Missouri to Wichita, Kansas
23	September 12, 2023	Drove from Greene County, Missouri to Wichita, Kansas

All in violation of Title 18, United States Code, Section 1952(a)(3).

**COUNT 24**

(Felon in Possession of Firearm)

18 U.S.C. § 922(g)(1)

On or about July 15, 2021, in Miller County, Western District of Missouri, **DANIEL SCOTT KURTZEBORN**, the defendant, knowing he had previously been convicted of a crime punishable for a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm, that is, a Taurus, model 650, .357 caliber revolver, serial number YB61739; all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).



**COUNT 25**  
(Felon in Possession of Firearm)  
18 U.S.C. § 922(g)(1)

On or about August 24, 2023, in Camden County, Western District of Missouri, the defendant, **KEITH DEWAYNE NOLEN, JR. (a.k.a. “SEG”)**, knowing he had previously been convicted of a crime punishable for a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm, that is, a Taurus G2C, 9mm handgun, serial number TLP2751; all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

**A TRUE BILL.**

6/18/2024  
DATE

  
FOREPERSON OF THE GRAND JURY

/s/Aaron M. Maness and Cecily L. Hicks  
Aaron M. Maness  
Cecily L. Hicks  
Assistant United States Attorneys  
Western District of Missouri