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U.S. DISTRICT COURT  
CLEVELAND

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	<u>SUPERSEDING INDICTMENT</u>
	)	
Plaintiff,	)	CASE NO. 5:11CR594
	)	
v.	)	JUDGE DAN A. POLSTER
	)	
SAMUEL MULLET, SR.,	)	
JOHNNY S. MULLET,	)	Title 18, United States Code, Sections
DANNY S. MULLET,	)	249(a)(2), 371, 1001, 1519 and 2
LESTER S. MULLET,	)	
LEVI F. MILLER,	)	
ELI M. MILLER,	)	
EMANUEL SHROCK,	)	
LESTER MILLER,	)	
RAYMOND MILLER,	)	
FREEMAN BURKHOLDER,	)	
ANNA MILLER,	)	
LINDA SHROCK,	)	
LOVINA MILLER,	)	
KATHRYN MILLER,	)	
EMMA MILLER, and	)	
ELIZABETH MILLER,	)	
	)	
Defendants.	)	

## GENERAL ALLEGATIONS

1. At all times relevant to this indictment, M.M., B.M., D.W., R.H., A.H., L.H., M.L.M., M.S., and A.S. practiced the Amish religion.
2. At all times relevant to this indictment, beard and head hair were symbols of the Amish religion as practiced by M.M., B.M., D.W., R.H., A.H., L.H., M.L.M., M.S., and A.S.
3. At all times relevant to this indictment, SAMUEL MULLET, SR., JOHNNY S. MULLET, DANNY S. MULLET, LESTER S. MULLET, LEVI F. MILLER, ELI M. MILLER, EMANUEL SHROCK, LESTER MILLER, RAYMOND MILLER, FREEMAN BURKHOLDER, ANNA MILLER, LINDA SHROCK, LOVINA MILLER, KATHRYN MILLER, EMMA MILLER and ELIZABETH MILLER were members of a community in or near the Bergholz, Ohio area (the "Community") that purported to practice the Amish religion.
4. At all times relevant to this indictment, SAMUEL MULLET, SR. was the Bishop of the Community. As the Bishop, SAMUEL MULLET, SR. was the Community's leader. His responsibilities included "making sure things were peaceful", that the members were living their everyday lives in a manner that was consistent with scriptural teachings as interpreted by him, and "to see that the members obey" his instructions and directives.
5. At all times relevant to this indictment, SAMUEL MULLET, SR. encouraged and allowed the Community to engage in practices of self-deprivation and corporal punishment in order to demonstrate: (a) their truthfulness and devotion to SAMUEL MULLET, SR., and (b) that they were recommitting themselves to the Community.
6. At all times relevant to this indictment, SAMUEL MULLET, SR. misappropriated the wives of other members of the Community and "counseled" them on how to

be sexually satisfied in their marriages. To this end, the women were expected to leave their husbands and children and live in SAMUEL MULLET, SR.'s house where they were further expected to be sexually intimate with him. The women who disobeyed or resisted this practice were ostracized from the Community.

7. JOHNNY S. MULLET, DANNY S. MULLET, LESTER S. MULLET and LINDA SHROCK are among SAMUEL MULLET, SR.'s 18 children with his wife.

8. ELI M. MILLER, LESTER MILLER, and RAYMOND MILLER are among SAMUEL MULLET, SR.'s nephews.

9. LEVI MILLER is a member of the Community.

10. ANNA MILLER, LOVINA MILLER, KATHRYN MILLER, EMMA MILLER and ELIZABETH MILLER are married to some of SAMUEL MULLET, SR.'s nephews.

11. FREEMAN BURKHOLDER is married to one of SAMUEL MULLET, SR.'s nieces.

12. EMANUEL SHROCK is married to SAMUEL MULLET, SR.'s daughter LINDA SHROCK.

13. J.M. was a member of the Community.

#### COUNT 1

The Grand Jury charges:

1. Paragraphs 1-13 of the General Allegations are incorporated by reference in this count.

2. From in or about September 2011, through in or about March 2012, in the Northern District of Ohio, Eastern Division, and elsewhere, defendants SAMUEL MULLET,

SR., JOHNNY S. MULLET, DANNY S. MULLET, LESTER S. MULLET, LEVI F. MILLER, ELI M. MILLER, EMANUEL SHROCK, LESTER MILLER, RAYMOND MILLER, FREEMAN BURKHOLDER, ANNA MILLER, LINDA SHROCK, LOVINA MILLER, KATHRYN MILLER, EMMA MILLER and ELIZABETH MILLER (“Defendants”), and others known and unknown to the Grand Jury, did knowingly and voluntarily conspire, combine, confederate and agree with each other to:

A. Willfully cause bodily injury to M.M., B.M., D.W., R.H., A.H., L.H., M.L.M., M.S. and A.S. because of the actual and perceived religion of M.M., B.M., D.W., R.H., A.H., L.H., M.L.M., M.S. and A.S., resulting from travel using an instrumentality of interstate commerce and employing a dangerous weapon that travelled in interstate commerce, in violation of Title 18, United States Code, Section 249(a)(2).

B. Knowingly alter, conceal, cover up, falsify, and make a false entry in any record, document, and tangible object with the intent to impede, obstruct, and influence the investigation and proper administration of any matter within the jurisdiction of any department and agency of the United States, and in relation to and in contemplation of any such matter, in violation of Title 18, United States Code, Section 1519.

C. Willfully falsify, conceal, and cover up by any trick, scheme, and device a material fact, and make materially false, fictitious, and fraudulent statements and representations in any matter within the jurisdiction of the executive branch of the United States, in violation of Title 18, United States Code, Section 1001.

Manner and Means of the Conspiracy

3. It was part of the conspiracy to assault and willfully cause bodily injury to M.M., B.M., D.W., R.H., A.H., L.H., M.L.M., M.S. and A.S. by forcibly cutting off their beards and

head hair and causing them other physical injuries because of previous and ongoing religious disagreements Defendants and others known and unknown to the Grand Jury had and were having with M.M., B.M., D.W., R.H., A.H., L.H., M.L.M., M.S. and A.S.

4. It was part of the conspiracy that the beards and head hair were forcibly removed because beards and head hair are symbols of the Amish religion.

5. It was part of the conspiracy that similar attacks were discussed and planned for members of other Amish communities with whom there were previous and ongoing religious disagreements.

6. It was part of the conspiracy to destroy and conceal evidence of these attacks from law enforcement investigators, to include photographs taken after the assaults and the camera with which they were taken; scissors and clippers used during the assaults; the over-the-counter product intended to make D.W. ill; and the beard hair, head hair, and hair bonnet collected after at least one of the assaults.

7. It was part of the conspiracy that false and misleading statements were made to agents of the Federal Bureau of Investigation and other law enforcement agencies to hinder efforts to investigate the attacks on M.M., B.M., D.W., R.H., A.H., L.H., M.L.M., M.S. and A.S.

#### Overt Acts

In furtherance of this conspiracy, and to accomplish its objectives, the Defendants committed the following overt acts, among others, in the Northern District of Ohio, and elsewhere:

8. In or about September 2011, and at other previous times, ELI M. MILLER, LESTER MILLER, and others known and unknown to the Grand Jury, discussed in the presence

of SAMUEL MULLET, SR. and other members of the Community their intention to travel to Trumbull County, Ohio, to remove the beard and head hair of their parents, M.M. and B.M. On or about September 6, 2011, LESTER MILLER went to SAMUEL MULLET, SR.'s property and took possession of the Wahl battery-operated hair clippers stored there. The Wahl battery-operated hair clippers were purchased at Walmart and had travelled in and affected interstate commerce in that they were manufactured in Dover, Delaware.

9. On or about September 6, 2011, ELI M. MILLER, LESTER MILLER, RAYMOND MILLER, FREEMAN BURKHOLDER, ANNA MILLER, LOVINA MILLER, KATHRYN MILLER, EMMA MILLER and ELIZABETH MILLER, and others known and unknown to the Grand Jury, hired a driver to transport them from the Bergholz area to the residence of M.M. and B.M. in Trumbull County, Ohio.

10. On or about September 6, 2011, ELI M. MILLER, LESTER MILLER, RAYMOND MILLER, FREEMAN BURKHOLDER, ANNA MILLER, LOVINA MILLER, KATHRYN MILLER, EMMA MILLER and ELIZABETH MILLER, and others known and unknown to the Grand Jury, entered the home of M.M. and B.M. and forcibly restrained them.

11. On or about September 6, 2011, ELI M. MILLER, LESTER MILLER, RAYMOND MILLER, FREEMAN BURKHOLDER, ANNA MILLER, LOVINA MILLER, KATHRYN MILLER, EMMA MILLER and ELIZABETH MILLER, and others known and unknown to the Grand Jury, used scissors and the Wahl battery-operated hair clippers to forcibly cut off M.M.'s beard and head hair, as well as B.M.'s head hair, causing bodily injury to M.M. and B.M.

12. On or about September 6, 2011, ELIZABETH MILLER produced a bag that she had brought with her from Bergholz to ELI M. MILLER, LESTER MILLER, RAYMOND

MILLER, FREEMAN BURKHOLDER, ANNA MILLER, LOVINA MILLER, KATHRYN MILLER, and EMMA MILLER , and others known and unknown to the Grand Jury, which they then used to collect M.M.'s beard and head hair as well as B.M.'s head hair and bonnet.

13. On or about September 6, 2011, ELI M. MILLER, LESTER MILLER, RAYMOND MILLER, FREEMAN BURKHOLDER, ANNA MILLER, LOVINA MILLER, KATHRYN MILLER, EMMA MILLER and ELIZABETH MILLER, and others known and unknown to the Grand Jury, directed their hired driver to leave the Trumbull County home of M.M. and B.M. and return to SAMUEL MULLET, SR.'s home in the Bergholz area.

14. On or about September 6, 2011, upon their return to the Bergholz area, ELI M. MILLER, LESTER MILLER, RAYMOND MILLER, FREEMAN BURKHOLDER, ANNA MILLER, LOVINA MILLER, KATHRYN MILLER, EMMA MILLER and ELIZABETH MILLER, and others known and unknown to the Grand Jury, recounted for SAMUEL MULLET, SR. and others known and unknown to the Grand Jury, what they had done to M.M. and B.M.

15. On or about September 6, 2011, ELI M. MILLER, LESTER MILLER, RAYMOND MILLER, FREEMAN BURKHOLDER, ANNA MILLER, LOVINA MILLER, KATHRYN MILLER, EMMA MILLER and ELIZABETH MILLER, and others known and unknown to the Grand Jury, after returning from M.M.'s and B.M.'s home, produced a bag containing M.M.'s beard and head hair as well as B.M.'s head hair and bonnet.

16. On or about September 6, 2011, SAMUEL MULLET, SR. advised and directed that the bag containing M.M.'s beard and head hair as well as B.M.'s head hair and bonnet be destroyed.

17. On or about September 6, 2011, J.M. (not charged herein), and others known and unknown to the Grand Jury, burned the bag containing M.M.'s beard and head hair as well as B.M.'s head hair and bonnet on a trash pile located on SAMUEL MULLET, SR.'s property.

18. In or about September 2011, ELI M. MILLER purchased a Fuji disposable camera from Walmart, in part, to memorialize how certain of the victims looked before and after their beard and head hair was removed. The camera travelled in and affected interstate commerce in that it was manufactured in Greenwood, South Carolina.

19. In or about September 2011, and at other previous times, LEVI MILLER, ELI M. MILLER, EMANUEL SHROCK, and others known and unknown to the Grand Jury, discussed in the presence of SAMUEL MULLET, SR. and other members of the Community, their intention to entice D.W. to travel to Bergholz, Ohio so that they could remove his beard and head hair.

20. In or about September 2011, LEVI MILLER placed a telephone call to D.W. to entice D.W. to hire a driver so that D.W. could visit LEVI MILLER at the home of EMANUEL SHROCK, which is in the Bergholz area.

21. On or about September 24, 2011, while D.W. was visiting LEVI MILLER, ELI M. MILLER and EMANUEL SHROCK at the home of EMANUEL SHROCK, LEVI MILLER provided D.W. with a cup of coffee that was laced with an over-the-counter product intended to make D.W. ill.

22. On or about September 24, 2011, LEVI MILLER, ELI M. MILLER, EMANUEL SHROCK, and others known and unknown to the Grand Jury, enticed D.W. to take a walk with them purportedly to view EMANUEL SHROCK's property, and thereafter forcibly restrained D.W. and removed his beard and head hair with scissors, causing bodily injury to D.W.



23. In or about October 2011, and at other previous times, JOHNNY S. MULLET, DANNY S. MULLET, LESTER S. MULLET, LEVI F. MILLER, ELI M. MILLER, and others known and unknown to the Grand Jury, discussed in the presence of SAMUEL MULLET, SR. and other members of the Community their intention to travel to Holmes and Carroll counties to remove the beard and head hair of Amish persons who resided there.

24. On or about October 4, 2011, JOHNNY S. MULLET, DANNY S. MULLET, LESTER S. MULLET, LEVI F. MILLER, ELI M. MILLER, EMANUEL SHROCK, LESTER MILLER, and approximately 22 other persons known and unknown to the Grand Jury, hired a driver to take them in a motor vehicle and horse trailer from the Bergholz area to: the Mt. Hope Auction in Holmes County; a residence in Holmes County; a residence in Carroll County; and then back to SAMUEL MULLET, SR.'s house.

25. On or about October 4, 2011, SAMUEL MULLET, SR. provided JOHNNY S. MULLET with directions from the Mt. Hope Auction to the home of R.H.

26. On or about October 4, 2011, LESTER MILLER purchased from C.W., a merchant at the Mt. Hope Auction, a pair of 8" horse mane shears which were manufactured in the State of New York and sent via private, interstate postal carrier to C.W. in Ohio for resale, and provided those scissors to JOHNNY S. MULLET, DANNY S. MULLET, LESTER S. MULLET, LEVI F. MILLER and ELI M. MILLER. These 8" horse mane shears were sharp enough to cut through leather.

27. On or about October 4, 2011, JOHNNY S. MULLET, DANNY S. MULLET, LESTER S. MULLET, LEVI F. MILLER, and ELI M. MILLER entered the home of R.H. where they assaulted him by forcibly restraining him and removing his beard and head hair, causing R.H. bodily injury.

28. On or about October 4, 2011, JOHNNY S. MULLET, DANNY S. MULLET, LESTER S. MULLET, LEVI F. MILLER, and ELI M. MILLER entered the home of R.H., forcibly restrained his son, A.H., and cut off A.H.'s beard and head hair, causing A.H. bodily injury.

29. On or about October 4, 2011, JOHNNY S. MULLET, DANNY S. MULLET, LESTER S. MULLET, LEVI F. MILLER, and ELI M. MILLER entered the home of R.H. and assaulted L.H. when L.H. tried to intervene and stop the attack on R.H., causing L.H. bodily injury.

30. On or about October 4, 2011, JOHNNY S. MULLET, DANNY S. MULLET, LESTER S. MULLET, LEVI F. MILLER, and ELI M. MILLER went to the home of M.L.M., forcibly restrained him, cut off his beard hair, and caused M.L.M. bodily injury.

31. On or about October 4, 2011, JOHNNY S. MULLET, DANNY S. MULLET, LESTER S. MULLET, LEVI F. MILLER, ELI M. MILLER, EMANUEL SHROCK, LESTER MILLER, and others known and unknown to the Grand Jury, directed their hired driver to take them, as well as the approximately 22 persons in the horse trailer, to SAMUEL MULLET, SR.'s home where they immediately reported to SAMUEL MULLET, SR. that they had cut off the head and beard hair of Amish men.

32. In or about October 2011, SAMUEL MULLET, SR. gave several media interviews wherein he stated that: (a) the beard and head hair cuttings were "all about religion"; (b) that these religious disputes "started with us excommunicating members that weren't listening to or obeying the laws"; (c) he could have stopped the attacks if he wanted to; (d) the attacks were intended to send a message to members of the Amish community in Holmes County (where R.H., A.H. and L.H. reside) that they should be ashamed for the way they treated

SAMUEL MULLET, SR. and the Community; and (e) he should be allowed to punish those who don't obey him rather than let them run all over him.

33. On or about October 9, 2011, SAMUEL MULLET, SR., LESTER S. MULLET, and others known and unknown to the Grand Jury, participated in a recorded telephone conversation in which they discussed a camera that was used to memorialize some of the attacks. During this conversation, LESTER S. MULLET asked SAMUEL MULLET, SR. to get rid of the camera because he (LESTER S. MULLET) had told law enforcement officers about the camera. SAMUEL MULLET, SR. responded by saying that he (SAMUEL MULLET, SR.) was not going to throw the camera away but that ELI M. MILLER would tell law enforcement officers that the camera had been destroyed.

34. On or about October 9, 2011, during the same recorded telephone call described in Paragraph 33 above, SAMUEL MULLET, SR. told LESTER S. MULLET that other members of the Community, including RAYMOND MILLER, were "ready to do it again should I say – they want to go right away again."

35. On or about October 9, 2011, SAMUEL MULLET, SR., LEVI MILLER, and others known and unknown to the Grand Jury, participated in a recorded telephone call in which they discussed SAMUEL MULLET, SR. recovering and destroying: (a) the over-the-counter product LEVI MILLER put in D.W.'s coffee, and (b) the camera used and attempted to be used during the assaults.

36. On or about October 9, 2011, during the same recorded telephone call described in Paragraph 35 above, SAMUEL MULLET, SR. again said that some members of the Community were ready to commit similar attacks.

37. On or about October 15, 2011, LESTER MILLER told law enforcement officers that he did not know where the 8" horse mane shears he purchased at the Mt. Hope Auction, which were used in the October 4, 2011 attacks, were located.

38. In or about October 2011, and at other prior and subsequent times, EMANUEL SHROCK, LINDA SHROCK, and others known and unknown to the Grand Jury, discussed in the presence of SAMUEL MULLET, SR. and other members of the Community their intention to entice M.S. to Bergholz, Ohio so that they could remove his beard and head hair.

39. On or about October 17, 2011, EMANUEL SHROCK placed and caused to be placed in a post office or other authorized depository for mail matter a letter to be sent and delivered by the Postal Service or other private or commercial carrier to M.S., in which EMANUEL SHROCK invited M.S. to visit him in the Bergholz area.

40. On or about October 24, 2011, EMANUEL SHROCK placed and caused to be placed in a post office or other authorized depository for mail matter another letter to be sent and delivered by the Postal Service or other private or commercial carrier to M.S., in which EMANUEL SHROCK invited M.S. to visit him in the Bergholz area.

41. On or about November 5, 2011, EMANUEL SHROCK placed and caused to be placed in a post office or other authorized depository for mail matter another letter to be sent and delivered by the Postal Service or other private or commercial carrier to M.S., in which EMANUEL SHROCK invited M.S. to visit him in the Bergholz area.

42. On or about November 9, 2011, EMANUEL SHROCK had a conversation with the Jefferson County Sheriff in which EMANUEL SHROCK told the Sheriff that M.S. would not have his beard and head hair removed while M.S. was visiting with EMANUEL and LINDA SHROCK.

43. On or about November 9, 2011, after M.S. and A.S. hired a driver to transport them to EMANUEL SHROCK's home in the Bergholz area, EMANUEL SHROCK, and others known and unknown to the Grand Jury, forcibly restrained M.S. and removed his beard and head hair, causing M.S. bodily injury.

44. On or about November 9, 2011, LINDA SHROCK, and others known and unknown to the Grand Jury, forcibly restrained and assaulted A.S. when she attempted to intervene and stop the attack on M.S., causing A.S. bodily injury.

45. On or about November 22, 2011, in an interview with agents with the Federal Bureau of Investigation, SAMUEL MULLET, SR. denied having any knowledge that members of the Community were considering stopping at the home of R.H on October 4, 2011.

46. In or about December 2011, a member of the Community gave the Fuji disposable camera, which was purchased by ELI M. MILLER and then used by ELI M. MILLER and others to memorialize the appearances of certain victims, to J.M. with instructions to conceal the camera from law enforcement and to dispose of the camera.

47. In or about December 2011, J.M. placed the Fuji disposable camera into plastic bags and then covered the camera and bags with leaves and twigs at the foot of a tree in a wooded area on SAMUEL MULLET, SR.'s property in Bergholz. J.M. used a knife to mark an "x" on the tree so that he could later recover and relocate the camera, if necessary. On or about March 16, 2012, J.M. voluntarily surrendered the Fuji disposable camera, which he had concealed since December 2011, to federal law enforcement.

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

COUNT 2

The Grand Jury further charges:

1. Paragraphs 1-13 of the General Allegations and Paragraphs 3-7, 8-17, 32, 34 and 36 of Count 1 of this superseding indictment are incorporated by reference in this count.
2. On or about September 6, 2011, in the Northern District of Ohio, Eastern Division, and elsewhere, defendants SAMUEL MULLET, SR., ELI M. MILLER, LESTER MILLER, RAYMOND MILLER, FREEMAN BURKHOLDER, ANNA MILLER, LOVINA MILLER, KATHRYN MILLER, EMMA MILLER and ELIZABETH MILLER, and others known and unknown to the Grand Jury, did willfully cause bodily injury to M.M. and B.M. because of the actual and perceived religion of M.M. and B.M.
3. Specifically, ELI M. MILLER, LESTER MILLER, RAYMOND MILLER, FREEMAN BURKHOLDER, ANNA MILLER, LOVINA MILLER, KATHRYN MILLER, EMMA MILLER and ELIZABETH MILLER, and others known and unknown to the Grand Jury, hired a driver to transport them in a motor vehicle to the home of M.M. and B.M., and then assaulted M.M. and B.M. by forcibly removing M.M.'s beard and head hair and B.M.'s head hair with scissors and Wahl battery-operated hair clippers.
4. The conduct described herein occurred as a result of the travel of ELI M. MILLER, LESTER MILLER, RAYMOND MILLER, FREEMAN BURKHOLDER, ANNA MILLER, LOVINA MILLER, KATHRYN MILLER, EMMA MILLER and ELIZABETH MILLER, and others known and unknown to the Grand Jury, using an instrumentality of interstate and foreign commerce.

5. The conduct described herein occurred as a result of ELI M. MILLER, LESTER MILLER, RAYMOND MILLER, FREEMAN BURKHOLDER, ANNA MILLER, LOVINA MILLER, KATHRYN MILLER, EMMA MILLER and ELIZABETH MILLER, and others known and unknown to the Grand Jury, employed dangerous weapons, to wit, a pair of scissors and Wahl battery-operated hair clippers which had traveled in and affected interstate and foreign commerce.

6. The conduct described herein involved ELI M. MILLER, LESTER MILLER, RAYMOND MILLER, FREEMAN BURKHOLDER, ANNA MILLER, LOVINA MILLER, KATHRYN MILLER, EMMA MILLER and ELIZABETH MILLER, and others known and unknown to the Grand Jury, kidnapping M.M and B.M.

All in violation of Title 18, United States Code, Sections 249(a)(2) and 2.

### COUNT 3

The Grand Jury further charges:

1. Paragraphs 1-13 of the General Allegations and Paragraphs 3-7, 18-22, 32-36 and 46-47 of Count 1 of this superseding indictment are incorporated by reference in this count.

2. On or about September 24, 2011, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendants SAMUEL MULLET, SR., LEVI MILLER, EMANUEL SHROCK, ELI MILLER, and others known and unknown to the Grand Jury, did willfully cause bodily injury to D.W. because of the actual and perceived religion of D.W.

3. Specifically, LEVI MILLER, EMANUEL SHROCK, ELI MILLER, and others known and unknown to the Grand Jury, assaulted D.W. by forcibly removing his beard and head hair with scissors after inducing D.W. to hire a driver to transport him and his wife to EMANUEL SHROCK's home in the Bergholz area.

4. The conduct described herein occurred as a result of the travel of D.W. and his wife using an instrumentality of interstate and foreign commerce.

5. The conduct described herein involved LEVI MILLER, EMANUEL SHROCK, ELI MILLER, and others known and unknown to the Grand Jury, kidnapping D.W.

All in violation of Title 18, United States Code, Sections 249(a)(2) and 2.

#### COUNT 4

The Grand Jury further charges:

1. Paragraphs 1-13 of the General Allegations and Paragraphs 3-7, 18, 23-29, 31-36 and 46-47 of Count 1 of this superseding indictment are incorporated by reference in this count.

2. On or about October 4, 2011, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendants, SAMUEL MULLET, SR., JOHNNY S. MULLET, DANNY S. MULLET, LESTER S. MULLET, LEVI MILLER, ELI M. MILLER, LESTER MILLER, and others known and unknown to the Grand Jury, did willfully cause bodily injury to R.H., A.H., and L.H. because of the actual and perceived religion of R.H., A.H., and L.H.

3. Specifically, JOHNNY S. MULLET, DANNY S. MULLET, LESTER S. MULLET, LEVI MILLER, ELI M. MILLER, and others known and unknown to the Grand Jury, hired a driver to transport them in a motor vehicle and horse trailer to the home of R.H., A.H., and L.H. where they assaulted R.H. and A.H. by forcibly removing their beards and head hair with the 8" horse mane shears purchased by LESTER MILLER and the Wahl battery-operated hair clippers, and assaulted L.H. by throwing him into the arm of a couch and injuring his ribs.

4. In connection with the conduct described herein, JOHNNY S. MULLET, DANNY S. MULLET, LESTER S. MULLET, LEVI MILLER, ELI M. MILLER, and others known and unknown to the Grand Jury, employed dangerous weapons, to wit, the 8" horse mane



shears purchased by LESTER MILLER and the Wahl battery-operated hair clippers, both of which had traveled in and affected interstate and foreign commerce.

5. The conduct described herein occurred as a result of the travel of JOHNNY S. MULLET, DANNY S. MULLET, LESTER S. MULLET, LEVI MILLER, ELI M. MILLER, and others known and unknown to the Grand Jury, using an instrumentality of interstate and foreign commerce.

6. The conduct described herein involved JOHNNY S. MULLET, DANNY S. MULLET, LESTER S. MULLET, LEVI MILLER, and ELI M. MILLER kidnapping R.H., A.H., and L.H.

All in violation of Title 18, United States Code, Sections 249(a)(2) and 2.

#### COUNT 5

The Grand Jury further charges:

1. Paragraphs 1-13 of the General Allegations and Paragraphs 3-7, 18, 23-24 and 30-36 of Count 1 of this superseding indictment are incorporated by reference in this count.

2. On or about October 4, 2011, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendants, SAMUEL MULLET, SR., JOHNNY S. MULLET, DANNY S. MULLET, LESTER S. MULLET, LEVI MILLER, ELI M. MILLER, LESTER MILLER, and others known and unknown to the Grand Jury, did willfully cause bodily injury to M.L.M. because of the actual and perceived religion of M.L.M.

3. Specifically, JOHNNY S. MULLET, DANNY S. MULLET, LESTER S. MULLET, LEVI MILLER, ELI M. MILLER, and others known and unknown to the Grand Jury, hired a driver to transport them in a motor vehicle and horse trailer to the home of M.L.M. where they assaulted M.L.M. by forcibly restraining him and removing his beard.

4. In connection with the conduct described herein, JOHNNY S. MULLET, DANNY S. MULLET, LESTER S. MULLET, LEVI MILLER, ELI M. MILLER, and others known and unknown to the Grand Jury, employed a dangerous weapon, to wit, the 8" horse mane shears purchased by LESTER MILLER, which had traveled in and affected interstate and foreign commerce.

5. The conduct described herein occurred as a result of the travel of JOHNNY S. MULLET, DANNY S. MULLET, LESTER S. MULLET, LEVI MILLER, ELI M. MILLER, and others known and unknown to the Grand Jury, using an instrumentality of interstate and foreign commerce.

6. The conduct described herein involved JOHNNY S. MULLET, DANNY S. MULLET, LESTER S. MULLET, LEVI MILLER, and ELI M. MILLER kidnapping M.L.M. All in violation of Title 18, United States Code, Sections 249(a)(2) and 2.

#### COUNT 6

The Grand Jury further charges:

1. Paragraphs 1-13 of the General Allegations and Paragraphs 3-7, 18, 32-36, 38-44 and 46-47 of Count 1 of this superseding indictment are incorporated by reference in this count.

2. On or about November 9, 2011, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendants SAMUEL MULLET, SR., EMANUEL SHROCK, LINDA SHROCK, and others known and unknown to the Grand Jury, did willfully cause bodily injury to M.S. and A.S. because of the actual and perceived religion of M.S. and A.S.

3. Specifically, EMANUEL SHROCK, LINDA SHROCK, and others known and unknown to the Grand Jury, assaulted M.S. by forcibly removing his beard and head hair with scissors, and assaulted A.S. when she attempted to intervene in the attack on M.S.

4. The conduct described herein occurred as a result of the travel of M.S. and A.S. using an instrumentality of interstate and foreign commerce, and EMANUEL SHROCK using an instrumentality of interstate and foreign commerce.

5. The conduct described herein involved EMANUEL SHROCK, LINDA SHROCK and others known and unknown to the Grand Jury, kidnapping M.S. and A.S.

All in violation of Title 18, United States Code, Sections 249(a)(2) and 2.

#### COUNT 7

The Grand Jury further charges:

1. Paragraphs 1-13 of the General Allegations and Paragraphs 3-17 of Count 1 of this superseding indictment are incorporated by reference in this count.

2. On or about September 6, 2011, in the Northern District of Ohio, Eastern Division, and elsewhere, defendant SAMUEL MULLET, SR., along with J.M. (not charged herein) and others known and unknown to the Grand Jury, did knowingly alter, conceal, and cover up any tangible object with the intent to impede, obstruct, and influence the investigation and proper administration of any matter within the jurisdiction of any department and agency of the United States, and in relation to and in contemplation of any such matter, to wit, burning a bag which contained M.M.'s head and beard hair and B.M.'s head hair and bonnet.

All in violation of Title 18, United States Code, Sections 1519 and 2.

#### COUNT 8

The Grand Jury further charges:

1. Paragraphs 1-13 of the General Allegations and Paragraphs 3-7, 18-29, 31-33, 35, 38-44 and 46-47 of Count 1 of this superseding indictment are incorporated by reference in this count.

2. From in or about September 2011, through in or about March 2012, in the Northern District of Ohio, Eastern Division, and elsewhere, defendants SAMUEL MULLET, SR., LEVI MILLER, ELI M. MILLER, LESTER S. MULLET, J.M. (not charged herein), and others known and unknown to the Grand Jury, did knowingly alter, conceal, and cover up any tangible object with the intent to impede, obstruct, and influence the investigation and proper administration of any matter within the jurisdiction of any department and agency of the United States, and in relation to and in contemplation of any such matter, to wit, the Fuji disposable camera which was used, in part, to memorialize the appearance of certain victims.

All in violation of Title 18, United States Code, Sections 1519 and 2.

#### COUNT 9

The Grand Jury further charges:

1. Paragraphs 1-13 of the General Allegations and Paragraphs 3-7, 23-24, 26-32 and 37 of Count 1 of this superseding indictment are incorporated by reference in this count.

2. From on or about October 4, 2011, through on or about November 28, 2011, in the Northern District of Ohio, Eastern Division, and elsewhere, defendant LESTER MILLER and others known and unknown to the Grand Jury, did knowingly alter, conceal, and cover up any tangible object with the intent to impede, obstruct, and influence the investigation and proper administration of any matter within the jurisdiction of any department and agency of the United States, and in relation to and in contemplation of any such matter, to wit, the 8" horse mane shears used in certain of the beard and head hair cutting attacks.

All in violation of Title 18, United States Code, Sections 1519 and 2.

COUNT 10

The Grand Jury further charges:

1. Paragraphs 1-13 of the General Allegations and Paragraphs 3-9, 14-17, 19-20, 23-25, 30-32, 34, 36, 38 and 45 of Count 1 of this superseding indictment are incorporated by reference in this count.

2. On or about November 22, 2011, in the Northern District of Ohio, Eastern Division, and elsewhere, defendant SAMUEL MULLET, SR. did willfully and knowingly make materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of the executive branch of the Government of the United States, to wit: stating to investigating agents with the Federal Bureau of Investigation that he had no knowledge that members of the Community were considering stopping at the home of R.H. on October 4, 2011.

All in violation of Title 18, United States Code, Section 1001.

A TRUE BILL.

Original Document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.

UNITED STATES V. SAMUEL MULLET, SR., ET AL.

A TRUE BILL.

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FOREPERSON

STEVEN M. DETTELBACH  
UNITED STATES ATTORNEY

By:

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DAVID A. SIERLEJA  
Supervisor in Charge