

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

U.S. DISTRICT COURT NORTHERN DISTRICT OF TEXAS FILED <div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 5px auto;"> APR 10 2013 </div> CLERK, U.S. DISTRICT COURT By <u> </u> Deputy

UNITED STATES OF AMERICA

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§
§

No.

v.

STERIC PAUL MITCHELL (01)
GREGORY STEVEN HUNT (02)
(a/k/a K.C.)

3. - 13CR - 128 - B

INDICTMENT

The Grand Jury Charges:

Count One

Conspiracy to Commit Kidnapping
(Violation of 18 U.S.C. § 1201(c))

Beginning on or about May 6, 2012, the exact date being unknown to the Grand Jury, in the Dallas Division of the Northern District of Texas, the defendants, **Steric Paul Mitchell** and **Gregory Steven Hunt**, did knowingly, intentionally and unlawfully combine, conspire, confederate, and agree together, with other persons both known and unknown to the Grand Jury, to commit certain offenses against the United States, to-wit: kidnapping, in violation of 18 U.S.C. § 1201(a).

OBJECTS OF THE CONSPIRACY

It was part of the conspiracy that the defendants, **Steric Paul Mitchell** and **Gregory Steven Hunt**, and others both known and unknown to the Grand Jury, discussed and planned with each other the kidnapping of K.R., the victim. It was part of the scope

of said conspiracy that **Mitchell** and **Hunt** would unlawfully seize, confine, inveigle, abduct, carry away, hold, sexually assault, and rape the victim.

MANNER AND MEANS

It was part of the conspiracy that the defendants, **Steric Paul Mitchell** and **Gregory Steven Hunt**, and others formulated a plan and agreement which, among other things, included:

- a. the selection of the female victim to be abducted and raped;
- b. the time and location the abduction was to take place;
- c. the role each co-conspirator would play in the abduction and restraint of the victim;
- d. the transportation of the victim from the targeted location to other locations;
- e. the use of a taser and a firearm in the abduction and restraint of the victim;
- f. the use of rope and zip-ties to restrain the victim;
- g. plans to sell the victim into sex-slavery;
- h. plans to avoid detection and apprehension by law enforcement; and
- i. the use of instrumentalities of interstate and foreign commerce in committing and in furtherance of the commission of this offense, such as a firearm, motor vehicles, and cellular telephones.

OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

1. On or about May 6, 2012, Person A told K.R. that she had a "good friend" who wanted a woman to do a private dance for him and his friends at a party. Person A assured K.R. that these men were "safe." Person A then introduced K.R. to **Gregory**

Steven Hunt, who Person A identified as "K.C.," at an hotel in Dallas, Texas, which is in the Dallas Division of the Northern District of Texas. **Hunt** paid Person A money, and **Hunt** and K.R. departed in a motor vehicle driven by **Hunt**.

2. In reality, **Steric Paul Mitchell**, had hired **Hunt** to pick-up K.R. at the hotel and transport her to another location under the ruse that **Hunt** was taking K.R. to a private party when in fact **Hunt** and **Mitchell** planned to kidnap and sexually assault K.R..

3. On or about May 6, 2012, **Hunt** transported K.R. to an abandoned house in Dallas, Texas, where **Mitchell** was waiting. There, **Mitchell** threatened K.R. with a firearm and shocked her with a taser to frighten and restrain her. **Hunt** then raped K.R. while **Mitchell** stood guard with a firearm. After **Hunt** raped K.R., **Mitchell** shocked K.R. again with a taser, bound her ankles and wrists, wrapped her in a bed sheet, carried her to another motor vehicle, and put her in the backseat.

4. On or about May 7, 2012, **Mitchell** then drove K.R. to a second house in Dallas, Texas. **Mitchell** carried K.R., who was still bound in the bed sheet, inside the house, put her in a bedroom with a mattress on the floor, and raped her. After raping K.R., **Mitchell** telephonically contacted an unknown individual and negotiated the sale of K.R. **Mitchell** then told K.R. that he was going to sell her into sex-slavery. **Mitchell** then drugged K.R. and bound her again.

5. On or about May 7, 2012, **Mitchell** again wrapped K.R. in a bed sheet, put her into the backseat of a motor vehicle, and transported her to a house in Duncanville, Texas,

where he placed her in a bed and sexually assaulted her with his hands.

In violation of 18 U.S.C. § 1201(c).

Count Two

Using, Carrying, and Brandishing a Firearm
During and in Relation to a Crime of Violence
(Violation of 18 U.S.C. §§ 924(c)(1)(A)(ii) and 2)

On or about May 6, 2012, in the Dallas Division of the Northern District of Texas, the defendants, **Steric Paul Mitchell** and **Gregory Steven Hunt**, did knowingly use, carry and brandish a firearm, to wit: a Kimber, Model Custom II, .45 caliber pistol, during and in relation to a crime of violence, namely conspiracy to commit kidnapping, in violation of 18 U.S.C. § 1201(c), as alleged in Count One of this indictment, for which the defendants may be prosecuted in a court of the United States.

In violation of 18 U.S.C. §§ 924(c)(1)(A)(ii) and 2.

Count Three

Kidnapping

(Violation of 18 U.S.C. §§ 1201(a)(1) and 2)

On or about May 6, 2012, in the Dallas Division of the Northern District of Texas, the defendants, **Steric Paul Mitchell** and **Gregory Steven Hunt**, aiding and abetting one another, did willfully and unlawfully seize, confine, inveigle, kidnap, abduct, carry away, and hold K.R., the victim, for some purpose and benefit, and the defendants did use instrumentalities of interstate and foreign commerce, to wit: (1) a firearm, (2) motor vehicles and (3) cellular telephones, in committing and in furtherance of the commission of this offense.

In violation of 18 U.S.C. §§ 1201(a)(1) and 2.

Count Four

Felon in Possession of a Firearm
(Violation of 18 U.S.C. §§ 922(g)(1) and 924(e)(1))

From on or about May 5, 2012, through on or about May 7, 2012, in the Dallas Division of the Northern District of Texas, the defendant, **Steric Paul Mitchell**, having being convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess in and affecting interstate and foreign commerce, a firearm, to wit: a Ruger, Model 10/22, .22 caliber rifle; a Kimber, Model Custom II, .45 caliber pistol; a Soviet Union Military Style, Model M44, 7.62x54 millimeter caliber rifle; and a Bushmaster, Model XM15-E2S, .223 caliber rifle.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(e)(1).

Forfeiture Notice
(18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c))

Upon conviction for the offense alleged in Counts Two and Four of this Indictment, and pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), the defendant, **Steric Paul Mitchell**, shall forfeit to the United States of America any firearms and ammunition involved in the commission of the respective offenses.

This property includes, but is not limited to, the following:

- (1) a Ruger, Model 10/22, .22 caliber rifle;
- (2) a Kimber, Model Custom II, .45 caliber pistol;
- (3) a Bushmaster, Model XM15-E2S, .223 caliber rifle;
- (4) a Soviet Union Military Style, Model M44, 7.62x54 millimeter caliber rifle;
and
- (5) any ammunition collected with the above-listed weapons.

A TRUE BILL

Beth J. Bowman
FOREPERSON

SARAH R. SALDAÑA
UNITED STATES ATTORNEY

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THE UNITED STATES OF AMERICA

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INDICTMENT

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

18 U.S.C. §§ 924(c)(1)(A)(ii) and 2
Using, Carrying, and Brandishing a Firearm During and in Relation to
a Crime of Violence

18 U.S.C. §§ 1201(a)(1) and 2
Kidnapping

18 U.S.C. §§ 922(g)(1) and 924(e)(1)
Felon in Possession of a Firearm

18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c)
Forfeiture Notice

(4 COUNTS)

A true bill rendered:

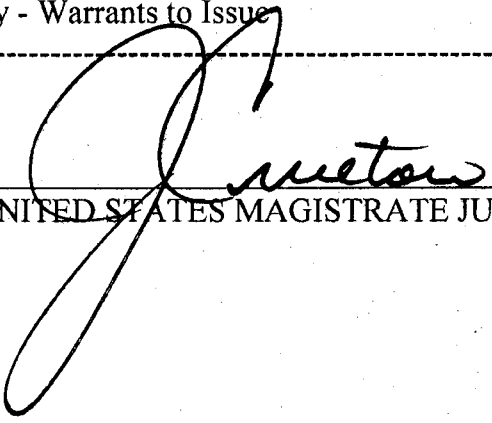
Ben J. Bowman

FORT WORTH

FOREPERSON

Filed in open court this 10 day of April, A.D. 2013.

Custody status: Defendants in State Custody - Warrants to Issue


UNITED STATES MAGISTRATE JUDGE