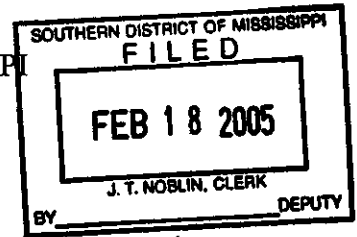


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION



UNITED STATES OF AMERICA

v.

Criminal No. 3:05CR16TSL-JCS

LAMONT RANSON and
CEDRIC CARPENTER a/k/a
Cedrick Carpenter

18 U.S.C. § 2339B
18 U.S.C. § 371
18 U.S.C. § 922(g)(1)
21 U.S.C. § 846
21 U.S.C. § 853

The United States Attorney charges:

INTRODUCTION

1. At all material times hereto:

a. The group ABU SAYYAF was a radical Islamic group based in the Philippines whose goal is to establish a separate Islamic state for the minority Muslim population of the Philippines.

b. Pursuant to Section 219 of the Immigration and Nationality Act, ABU SAYYAF was designated as a foreign terrorist organization in October 1997 and has been redesignated every two years thereafter, in 1999, 2001, and 2003.

COUNT 1

2. From in or about June 2004, and continuing until in or about August 2004, in Hinds County in the Jackson Division of the Southern District of Mississippi, and elsewhere, the defendants, **LAMONT RANSON** and **CEDRIC CARPENTER a/k/a Cedrick Carpenter**, did knowingly conspire with each other and with persons known and unknown to the Grand Jury, to

knowingly provide material support and resources, namely, false identification documents, to members of a foreign terrorist organization, namely, ABU SAYYAF.

3. It was a part of the conspiracy that defendants **RANSON** and **CARPENTER** would produce false identification documents, namely, Mississippi driver's licenses, Social Security cards, and birth certificates, in exchange for a combination of cash and heroin, knowing full well that the intended recipients of the false identification documents were represented to be members of ABU SAYYAF.

4. In furtherance of the conspiracy and to carry out its objectives, the following overt acts were committed in the Southern District of Mississippi and elsewhere:

a. On or about June 16, 2004, defendants **RANSON** and **CARPENTER** met with two confidential informants (CI-1 and CI-2) of the Department of Homeland Security, United States Immigration and Customs Enforcement ("ICE") to discuss a proposal to produce false identification documents for a group of individuals whom CI-2 identified as members of ABU SAYYAF.

b. During a telephone call on or about June 16, 2004, defendant **CARPENTER** told CI-2 the documents would cost \$20,000.00 per set and requested payment in both currency and heroin.

c. During a series of telephone calls that followed, defendants **RANSON** and **CARPENTER** continued to describe their ability and willingness to produce authentic documents with fraudulent identifiers using pictures supplied by the CIs.

d. On or about June 30, 2004, defendant **CARPENTER** told CI-2 by telephone that he was in Jackson, Mississippi to “line up” his contacts for producing fraudulent identities.

e. On or about June 30, 2004, defendants **RANSON** and **CARPENTER** made a series of cellular telephone calls in the vicinity of Jackson, Mississippi.

f. On or about July 1, 2004, defendant **CARPENTER** met with CI-2 and displayed a complete set of fraudulent identification documents (birth certificate, Social Security card, and Mississippi driver’s license), bearing **CARPENTER**’s photograph and a stolen identity. After viewing the documents, CI-2 requested five sets of documents, to which **CARPENTER** responded with an asking price of \$100,000.00, stating he wanted \$50,000.00 in currency and \$50,000.00 worth of heroin (about half of a kilogram).

g. On or about July 19, 2004, CI-2 placed a telephone call to defendant **CARPENTER**, who agreed to meet later that evening, but failed to appear.

h. On or about August 16, 2004, defendant **CARPENTER** told CI-1 that he desired to move forward with providing CI-2 with the fraudulent documents.

i. On or about August 18, 2004, defendant **CARPENTER** agreed to meet with CI-2 later that week to finalize the deal.

j. On or about August 20, 2004, defendant **CARPENTER** told CI-2 he still was able to complete the deal.

All in violation of Section 2339B, Title 18, United States Code.

COUNT 2

5. The factual allegations in paragraphs 1 through 4 of this Indictment are repeated and realleged as though set forth in their entirety herein.

6. From in or about April 2004, and continuing until in or about August 2004, in Hinds County in the Jackson Division of the Southern District of Mississippi, and elsewhere, the defendants, **LAMONT RANSON** and **CEDRIC CARPENTER a/k/a Cedrick Carpenter**, did knowingly and willfully conspire with each other and with others known and unknown to the Grand Jury, to defraud the United States and to commit an offense against the United States, namely, production of false identification documents, in violation of Section 1028, Title 18, United States Code.

7. In furtherance of the conspiracy and to carry out its objectives, the following additional overt acts were committed in the Southern District of Mississippi and elsewhere:

a. In or about April 2004, defendants **RANSON** and **CARPENTER** approached CI-1 while on board a Carnival Cruise Lines ship during a cruise from New Orleans, Louisiana to the Gulf of Mexico and Western Caribbean Sea to discuss their involvement in producing fraudulent documents and narcotics trafficking.

b. In or about the second week of June 2004, defendant **RANSON** displayed to CI-1 a computer program on **RANSON**'s laptop computer. The presentation was made from the trunk of defendant **RANSON**'s car and included a program for the production of driver's licenses.

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

COUNT 3

8. The factual allegations in paragraphs 1 through 7 of this Indictment are repeated and realleged as though set forth in their entirety herein.

9. From in or about June 2004, and continuing until in or about August 2004, in Hinds County in the Jackson Division of the Southern District of Mississippi, and elsewhere, the defendants, **LAMONT RANSON** and **CEDRIC CARPENTER a/k/a Cedrick Carpenter**, did knowingly attempt to provide material support and resources, namely, false identification documents, to members of a foreign terrorist organization, namely, ABU SAYYAF.

All in violation of Sections 2339B and 2, Title 18, United States Code.

COUNT 4

10. On or about August 31, 2004, in Orleans Parish the Eastern District of Louisiana, the defendant, **CEDRIC CARPENTER a/k/a Cedrick Carpenter**, having been convicted on or about June 14, 1994, in the Twenty-Fourth District Court of Jefferson Parish, Louisiana, Cause Number 93-2131, of the crime of simple robbery, a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting commerce a firearm, to wit: a Winchester model 94, .44 caliber rifle, serial number 6354670, in violation of Sections 922(g)(1) and 924(a)(2), Title 18, United States Code.

COUNT 5

11. From in or about June 2004, and continuing until in or about August 2004, in Hinds County in the Jackson Division of the Southern District of Mississippi, and elsewhere, the defendant,

CEDRIC CARPENTER a/k/a Cedrick Carpenter, did knowingly and willfully attempt to commit the following offense against the United States, to wit, knowingly and intentionally possessing with intent to distribute more than 100 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I narcotic drug controlled substance, to wit, approximately 500 grams of heroin, as prohibited by Section 841(a)(1), Title 21, United States Code.

All in violation of Section 846, Title 21, United States Code.

COUNT 6

FORFEITURE


12. As a result of the offense specified in Count 5 above, the defendant, **CEDRIC CARPENTER a/k/a Cedrick Carpenter**, shall forfeit to the United States any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such violations and any and all of the property of the said defendants used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violations.

13. Further, if any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or

- e. has been commingled with other property, which cannot be divided without difficulty,

then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendant up to the value of the property described in this indictment or any bill of particulars supporting it, all in violation of Section 853, Title 21, United States Code.



DUNN LAMPTON
United States Attorney