

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
WESTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	No. 4:09CR00099 BSM
	)	
RANDEEP MANN; and	)	Title 18, U.S.C. § 2332a
SANGEETA MANN, a/k/a SUE MANN)	)	Title 18, U.S.C. § 844(i)
	)	Title 26, U.S.C. § 5861(d)
	)	Title 18, U.S.C. § 922(o)(1)
	)	Title 18, U.S.C. § 3013
	)	Title 18, U.S.C. § 3571
	)	Title 18, U.S.C. § 3583
	)	Title 18, U.S.C. § 1512(k)
	)	Title 18, U.S.C. § 1512(c)(1)
	)	Title 18, U.S.C. § 1791(a)(2)
	)	Title 18, U.S.C. § 2
	)	Title 18, U.S.C. § 1623
	)	Title 26, U.S.C. § 5872
	)	Title 18, U.S.C. § 924(d)
	)	Title 28, U.S.C. § 2461

**SECOND SUPERSEDING INDICTMENT**

THE GRAND JURY CHARGES:

**COUNT ONE**

From in or about February 2008 until on or about February 4, 2009, in the Eastern District of Arkansas, the defendant,

RANDEEP MANN,

aided and abetted by a person and persons unknown to the Grand Jury, did, without lawful authority, knowingly use, and attempt and conspire to use, a weapon of mass destruction against a person and property within the United States, and the offense, and the results of the offense, affected interstate commerce.

All in violation of Title 18, United States Code, Section 2332a.

**COUNT TWO**

On or about February 4, 2009, in the Eastern District of Arkansas, the defendant,

RANDEEP MANN,

aided and abetted by a person and persons unknown to the Grand Jury, did maliciously damage, destroy and attempt to damage and destroy, by means of an explosive, a vehicle, to wit: a white 2005 Lexus VIN JTJHW31U982853031, used in interstate commerce and in an activity affecting interstate commerce, and such conduct directly and proximately resulted in personal injury to a person known to the Grand Jury.

All in violation of Title 18, United States Code, Section 844(i).

**COUNT THREE**

From a date unknown to the Grand Jury until on or about March 3, 2009, in the Eastern District of Arkansas, the defendant,

RANDEEP MANN,

did knowingly possess one or more firearms, as defined in Title 26, United States Code, Section 5845, to wit: approximately ninety-eight 40 mm HE, M406 grenades, which were not registered to him in the National Firearms Registration and Transfer Record.

All in violation of Title 26, United States Code, Section 5861(d).

**COUNT FOUR**

On or about March 4, 2009, in the Eastern District of Arkansas, the defendant,

RANDEEP MANN,

did knowingly possess a firearm, as defined in Title 26, United States Code, Section 5845, to wit: an Interord Corporation, Model USAS-12, 12-gauge shotgun, serial number A002089 SA, which was not registered to him in the National Firearms Registration and Transfer Record.

All in violation of Title 26, United States Code, Section 5861(d).

**COUNT FIVE**

On or about March 4, 2009, in the Eastern District of Arkansas, the defendant,  
RANDEEP MANN,  
did knowingly possess a firearm, as defined in Title 26, United States Code, Section 5845, to wit: a 7.62 caliber machinegun, serial number BM-0834, which was not registered to him in the National Firearms Registration and Transfer Record.

All in violation of Title 26, United States Code, Section 5861(d).

**COUNT SIX**

On or about March 4, 2009, in the Eastern District of Arkansas, the defendant,  
RANDEEP MANN,  
did knowingly possess a machinegun, as defined in Title 26, United States Code, Section 5845(b), to wit: a 7.62 caliber machinegun, serial number BM-0834.

All in violation of Title 18, United States Code, Section 922(o)(1).

**COUNT SEVEN**

From on or about March 4, 2009, until on or about August 6, 2009, in the Eastern District of Arkansas, the defendants,

RANDEEP MANN, and

SANGEETA MANN, a/k/a SUE MANN,  
did conspire with each other to corruptly obstruct, influence, and impede an official  
proceeding, in violation of Title 18, United States Code § 1512(c)(2).

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

**COUNT EIGHT**

From on or about March 4, 2009, until on or about May 5, 2009, in the Eastern  
District of Arkansas, the defendants,

RANDEEP MANN, and  
SANGEETA MANN, a/k/a SUE MANN,

aiding and abetting one another, did corruptly conceal, and attempt to corruptly conceal,  
one or more of the following documents and objects, to wit: a special power of attorney, a  
general power of attorney, and pre-signed blank checks and other financial documents or  
objects related to a bank account ending in the numbers 8796, with the intent to impair  
the document's and other object's availability for use in an official proceeding.

All in violation of Title 18, United States Code, Sections 1512(c)(1) and 2. \_\_\_\_\_

**COUNT NINE**

1. On or about April 8, 2009, in the Eastern District of Arkansas, the defendant,  
SANGEETA MANN, a/k/a SUE MANN,

while under oath in a proceeding before the Grand Jury of the United States in the  
Eastern District of Arkansas, knowingly made a false material declaration that is to say:

2. At the time and the place aforesaid, the Grand Jury was conducting an  
investigation of RANDEEP MANN, the husband of SANGEETA MANN, a/k/a SUE  
MANN, for violations regarding possession of unregistered firearms. At the time of the

Grand Jury proceeding, RANDEEP MANN had been incarcerated for a period of time, and the actions and directives of RANDEEP MANN during his incarceration were material to a proper matter of inquiry for the Grand Jury.

3. At the time and place alleged, SANGEETA MANN, a/k/a SUE MANN, appearing as a witness under oath at a proceeding before the Grand Jury, knowingly made the following declarations in response to questions with respect to the material matter alleged in Paragraph 2 as follows:

Q: Did you remove anything else from the clinic?

A: No. ...

Q: Specifically, did you take anything out of your husband's desk and take it to Tim or Mr. Gulu? ...

A: You asked me about – well you asked me about two things in the office, and I was thinking more in terms of – you know – mail, bills, records, things like that but then, when you said my husband's desk, I did remember, and I apologize, it just slipped my mind, that my brother-in-law had some checks that he had left with my husband and they were in his desk and I apologize, it completely slipped my mind, but I did take those because – you know – the office, the clinic is empty, there's nobody in there and I just didn't feel that that would be a safe place. So, I did bring those home. ...

Q: What did you do with those checks when you took them out?

A: They're at home.

Q: So, you still have them?

A: Yes. I just thought it would be safer.

Q: So, you removed something because you thought it would be safer?

A: Yes.

Q: Is that the only reason you removed them?

A: Yes. Yes.

4. The aforesaid underscored testimony of SANGEETA MANN, a/k/a SUE MANN, as she then and there well knew and believed was false in that the checks had not been removed from the clinic because she thought it would be safer but because she had been instructed by RANDEEP MANN to remove the items.

All in violation of Title 18, United States Code, Section 1623.

### **COUNT TEN**

On or about September 4, 2009, in the Eastern District of Arkansas, the defendant,  
RANDEEP MANN,  
being an inmate of a prison, as defined in Title 18, United States Code, Section 1791(d)(4), to wit: the Pulaski County Regional Detention Facility, did knowingly possess a prohibited object, to wit: chloroform.

All in violation of Title 18, United States Code, Sections 1791(a)(2).

### **FORFEITURE ALLEGATION ONE**

Upon conviction of Count Three of this Second Superseding Indictment, the defendant,

RANDEEP MANN,

shall forfeit to the United States pursuant to Title 26, U.S.C. § 5872 and Title 28, U.S.C. § 2461(c), all firearms and ammunition involved in the commission of the offense(s), including but not limited to the following:

Approximately ninety-eight 40 mm HE, M406 grenades.

**FORFEITURE ALLEGATION TWO**

Upon conviction of Count Four of this Second Superseding Indictment, the defendant,

RANDEEP MANN,

shall forfeit to the United States pursuant to Title 26, U.S.C. § 5872 and Title 28, U.S.C. § 2461(c), all firearms and ammunition involved in the commission of the offense(s), including but not limited to the following:

An Interord Corporation, Model USAS-12, 12-gauge shotgun,  
serial number A002089 SA.

**FORFEITURE ALLEGATION THREE**

Upon conviction of Count Five of this Second Superseding Indictment, the defendant,

RANDEEP MANN,

shall forfeit to the United States pursuant to Title 26, U.S.C. § 5872 and Title 28, U.S.C. § 2461(c), all firearms and ammunition involved in the commission of the offense(s), including but not limited to the following:

A 7.62 caliber machine gun, serial number BM-0834.

**FORFEITURE ALLEGATION FOUR**

Upon conviction of Count Six of this Second Superseding Indictment, the defendant,

RANDEEP MANN,

shall forfeit to the United States pursuant to Title 18, U.S.C. § 924(d) and Title 28, U.S.C. § 2461(c), all firearms and ammunition involved in the commission of the offense(s), including but not limited to the following:

A 7.62 caliber machine gun, serial number BM-0834.

(End of Text. Signature page attached.)

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A TRUE BILL.

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FOREPERSON OF THE GRAND JURY

JANE W. DUKE  
UNITED STATES ATTORNEY

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