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**INDICTMENT – 1** 

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Defendants, BENJAMIN THEODORE STUCKART, JUSTICE FORRAL, MIKKI PIKE HATFIELD, ERIN NICOLE LANG, COLLIN JAMES MUNCEY, THALIA MARIE RAMIREZ, BOBBI LEE SILVA, BAJUN DHUNJISHA MAVALWALLA II, and JAC DALITSO ARCHER, and other individuals, both known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate and agree together with each other to prevent, by force, intimidation, and threat, an officer of the United States from discharging any duties of his office, and to injure an officer in his person and property while engaged in and on account of the lawful discharge of the duties of his office, and to injure his property in order to molest, interrupt, hinder, and impede him in the discharge of his official duties, all in violation of 18 U.S.C. § 372.

## Objects of the Conspiracy

The objects of the conspiracy included the use of force and threats against, and intimidation of federal agents with United States Immigration and Customs Enforcement and Homeland Security Investigations, and the federal agents with the Bureau of Alcohol, Tobacco, Firearms, and Explosives, the United States Border Patrol, and Spokane Police Department and Spokane County Sheriff's Office assisting them, in order to impede and thwart the processing and transport of federal detainees to their immigration hearings in Tacoma, Washington, and to coerce the release of federal detainees.

## Overt Acts of the Conspiracy

In furtherance of the conspiracy and to effect the object thereof, the Defendants and the other known and unknown co-conspirators performed the following overt acts:

- 1. On or about June 11, 2025, at 12:52 PM, in the Eastern District of Washington, Defendant BENJAMIN THEODORE STUCKART, posted on social media a call for others to come and join him as he blocked a bus designated to transport all the federal detainees in the facility to Tacoma, Washington for their immigration hearings. Defendant JAC DALITSO ARCHER, and other coconspirators arrived in response to the call and along with BENJAMIN THEODORE STUCKART, blocked the pathway and door to the transport bus despite orders to disperse.
- 2. On or about June 11, 2025, in the Eastern District of Washington,
  Defendant JUSTICE FORRAL intentionally parked his vehicle to block the
  pathway of the transport bus and preclude its movement. Defendants JUSTICE
  FORRAL and ERIN NICOLE LANG released the air from the tires of the
  transport bus to preclude its movement. Other co-conspirators painted the
  windshield of the transport bus rendering it unsafe to operate.
- 3. On or about June 11, 2025, in the Eastern District of Washington, while federal officers attempted to exit the federal facility through the secure

parking lot and vehicle gate located on the south end of the premises, Defendants JUSTICE FORRAL, MIKKI PIKE HATFIELD, COLLIN JAMES MUNCEY, BOBBI LEE SILVA, BAJUN DHUNJISHA MAVALWALLA II, JAC DALITSO ARCHER, and other co-conspirators physically blocked the driveway of the federal facility and/or pushed against the officers, despite orders to disperse and efforts to remove them from the property. Defendant BOBBI LEE SILVA struck a federal officer from behind as the federal officer was attempting to clear the pathway for transport vehicles to safely exit the facility.

- 4. On or about June 11, 2025, in the Eastern District of Washington,
  Defendants JUSTICE FORRAL, COLLIN JAMES MUNCEY, MIKKI PIKE
  HATFIELD, and other co-conspirators placed trash cans, sand/cement bags,
  benches, signs, and other objects in front of the ingresses and egresses to block the
  exit of federal officers and detainees from the federal facility.
- 5. On or about June 11, 2025, in the Eastern District of Washington, after the arrival of the Spokane Police Department, Spokane Police Department placed marked patrol vehicles in front of and behind a red transport van that had been then designated to transport the federal detainees being held in the facility to Tacoma, Washington for their immigration hearings. The red van was quickly surrounded and blocked by BENJAMIN THEODORE STUCKART, MIKKI PIKE HATFIELD, ERIN NICOLE LANG, BOBBI LEE SILVA, and other co-

conspirators. THALIA MARIE RAMIREZ, armed with a boxcutter, slashed the tires of the red transport van rendering it unsafe to operate.

- 6. On or about June 11, 2025, in the Eastern District of Washington,
  Defendant MIKKI PIKE HATFIELD threw a deployed incendiary device in the
  direction of Spokane Police Department and Spokane County Sheriff's Office
  deputies.
- 7. On or about June 11, 2025, in the Eastern District of Washington,
  Defendant JAC DALITSO ARCHER posted on social media a call for others to
  come and join noting the intent was to "risk arrest to block the exits to ICE."
- 8. Multiple calls for assistance were made to local law enforcement agencies. Federal agents, civilian employees, and the detainees were unable to leave the facility as a result of the actions of BENJAMIN THEODORE STUCKART, JUSTICE FORRAL, MIKKI PIKE HATFIELD, ERIN NICOLE LANG, COLLIN JAMES MUNCEY, THALIA MARIE RAMIREZ, BOBBI LEE SILVA, BAJUN DHUNJISHA MAVALWALLA II, JAC DALITSO ARCHER, and other co-conspirators, until approximately 9:00 PM, and only with the assistance of the Spokane Police Department S.W.A.T. team.

The overt acts detailed in the allegations of Counts 2 and 3 of this Indictment are hereby realleged as if fully set forth herein and incorporated by reference. All in violation of 18 U.S.C. § 372.

## COUNT 2

On or about June 11, 2025, in the Eastern District of Washington, the Defendant, BOBBI LEE SILVA, did forcibly assault, resist, oppose, impede, intimidate, and interfere with a federal officer and federal employee and a person assisting such an officer and employee, as designated in 18 U.S.C. § 1114, who was engaged in and on account of the performance of official duties, and such acts involved physical contact with the victim and involved the intent to cause another felony, to wit: a violation of 18 U.S.C. § 372. All in violation of 18 U.S.C. § 111(a)(1).

## COUNT 3

On or about June 11, 2025, in the Eastern District of Washington, the Defendant, MIKKI PIKE HATFIELD, did forcibly assault, resist, oppose, impede, intimidate, and interfere with a federal officer and federal employee and a person assisting such an officer and employee, as designated in 18 U.S.C. § 1114, who was engaged in and on account of the performance of official duties, and such acts involved the intent to cause another felony, to wit: a violation of 18 U.S.C. § 372, and did use a dangerous weapon to forcibly assault, resist, oppose, impede, intimidate, and interfere with a federal officer and federal employee and a person assisting such an officer and employee, as designated in 18 U.S.C. § 1114, while

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