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CJB/KSH/SAG

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

FILED IN OPEN COURT
AUG 24 2022
CHARLES R. DIARD, JR.
CLERK

UNITED STATES OF AMERICA

*

v.

* CRIM. NO. 22-cr-00020-TFM
* USAO NO. 21R00308

JEFFERY SIKES

*

VIOLATIONS:

a.k.a. "Kenneth Allen"

*

18 U.S.C. § 844(n)

ERICA SIKES

*

18 U.S.C. § 844(i)

a.k.a. "Erica Brewster"

*

SEAN BOTTORFF

*

a.k.a. "Sean McFarland"

*

JENNA BOTTORFF

*

a.k.a. "Jenna McFarland"

*

MICHAEL BOTTORFF

*

QUINTON OLSON

*

ALEXANDER OLSON

*

SECOND SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

INTRODUCTION

1. At the time of the offenses set out herein, **JEFFERY SIKES, ERICA SIKES, SEAN BOTTORFF, JENNA BOTTORFF, MICHAEL BOTTORFF, QUINTON OLSON, ALEXANDER OLSON**, and a co-conspirator identified herein as "M.S." lived together in a house in Lillian, Alabama.

COUNT ONE

Conspiracy to Maliciously Destroy by Fire
Title 18, United States Code, Section 844(n)

2. Beginning on an unknown date before May 27, 2021, and continuing through an unknown date after June 11, 2021, in the Southern District of Alabama, and elsewhere, the defendants,

**JEFFERY SIKES,
ERICA SIKES,
SEAN BOTTORFF,
JENNA BOTTORFF,**

**MICHAEL BOTTORFF,
QUINTON OLSON, and
ALEXANDER OLSON**

did knowingly, willfully, and unlawfully combine, conspire, confederate, and agree with each other and with M.S. to maliciously damage and destroy, and attempt to maliciously damage and destroy, by means of fire, buildings and other personal and real property as described below used in activities in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 844(i).

OBJECTIVE OF THE CONSPIRACY

3. The objective of this conspiracy was to affect interstate and foreign commerce by maliciously setting fires to damage and destroy Walmart stores and the property within them so that Walmart, Inc. would change its commercial practices, including those practices identified by the co-conspirators in a document they wrote entitled the “*Declaration of War and Demands for the People*” (hereinafter “*Declaration of War*”).

MANNER AND MEANS OF THE CONSPIRACY

4. To achieve the conspiracy’s objective, multiple co-conspirators maliciously set and attempted to set fires inside four Walmart stores during business hours. Specifically, the manner and means of this conspiracy included, but were not limited to, the following events:

5. Prior to May 27, 2021, **JEFFERY SIKES, ERICA SIKES, SEAN BOTTORFF, JENNA BOTTORFF, MICHAEL BOTTORFF, QUINTON OLSON, and ALEXANDER OLSON** participated in meetings during which the conspiracy plans were made and during which the co-conspirators participated in the drafting of the *Declaration of War*.

6. The *Declaration of War* references malicious fires set by the co-conspirators, describes a group called “The Veterans Order,” makes a series of demands on Walmart, Inc. related to the company’s commercial practices, and threatens further malicious fires if Walmart, Inc. does not comply with the demands.

Malicious Fires at Store One — Mobile, Alabama

7. On or about May 27, 2021, **SEAN BOTTORFF** drove **JEFFERY SIKES**, **ALEXANDER OLSON**, and M.S. in **MICHAEL BOTTORFF**'s minivan to a Walmart store located on the I-65 Service Road in Mobile, Alabama (herein, "Store One"). **SEAN BOTTORFF** parked nearby Store One at which time **JEFFERY SIKES**, **ALEXANDER OLSON**, and M.S. exited the minivan.

8. **JEFFERY SIKES**, **ALEXANDER OLSON**, and M.S. entered Store One separately. Thereafter, **JEFFERY SIKES**, **ALEXANDER OLSON**, and M.S. lit and attempted to light malicious fires inside Store One. Subsequently, **JEFFERY SIKES**, **ALEXANDER OLSON**, and M.S. exited Store One separately and met back up with **SEAN BOTTORFF** at the minivan.

Malicious Fires at Store Two— Mobile, Alabama

9. On or about May 28, 2021, **ALEXANDER OLSON** drove himself and M.S. in **MICHAEL BOTTORFF**'s minivan to a Walmart store located on Rangeline Road in Mobile, Alabama (herein, "Store Two"). **ALEXANDER OLSON** parked nearby Store Two at which time he and M.S. exited the minivan.

10. **ALEXANDER OLSON** and M.S. entered Store Two separately. Thereafter, M.S. lit and attempted to light malicious fires inside Store Two. Subsequently, **ALEXANDER OLSON** and M.S. exited Store Two separately and met back up with each other at the minivan.

Burner Phone Purchase — Daphne, Alabama

11. After leaving Store Two, **ALEXANDER OLSON** drove **MICHAEL BOTTORFF**'s minivan to a Walmart store located in Daphne, Alabama. **ALEXANDER OLSON** parked and entered the store. Inside the Daphne Walmart, **ALEXANDER OLSON** purchased a Tracfone, identified herein as the "Burner Phone."

Burner Phone Used — Daphne, Alabama

12. On or about May 28, 2021, the Burner Phone connected to a Daphne, Alabama motel's WIFI network. While connected, the Burner Phone was used for certain purposes in furtherance of this conspiracy, including, but not limited to: creating a Gmail account with the address theveteransorder@gmail.com; photographing the *Declaration of War*; looking up contact information for media outlets; and sending photographs of the *Declaration of War* to multiple media outlets. Thereafter, the Burner Phone disconnected from the motel's WIFI network.

Malicious Fires at Store Three— Gulfport, Mississippi

13. On or about June 4, 2021, **SEAN BOTTORFF** drove **JEFFERY SIKES**, **ALEXANDER OLSON**, and M.S. in **MICHAEL BOTTOFF**'s minivan to a Walmart store located on Highway 49 in Gulfport, Mississippi (herein, "Store Three"). **SEAN BOTTORFF** parked nearby Store Three at which time **ALEXANDER OLSON** and M.S. exited the minivan.

14. **ALEXANDER OLSON** and M.S. entered Store Three separately. Thereafter, M.S. lit and attempted to light malicious fires inside Store Three. Subsequently, **ALEXANDER OLSON** and M.S. exited Store Three separately and met back up with **JEFFERY SIKES** and **SEAN BOTTORFF** at the minivan.

Malicious Fires at Store Four— Biloxi, Mississippi

15. Also on or about June 4, 2021, **SEAN BOTTORFF** drove **JEFFERY SIKES**, **ALEXANDER OLSON**, and M.S. in **MICHAEL BOTTORFF**'s minivan to a Walmart store located on Switzer Road in Biloxi, Mississippi (herein, "Store Four"). **SEAN BOTTORFF** parked nearby Store Four at which time **ALEXANDER OLSON** and M.S. exited the minivan.

16. **ALEXANDER OLSON** and M.S. entered Store Four separately. Thereafter, M.S. lit and attempted to light malicious fires inside Store Four. Subsequently, **ALEXANDER OLSON** and M.S. exited Store Four separately and met back up with **JEFFERY SIKES** and **SEAN BOTTORFF** at the minivan.

Burner Phone Used — Spanish Fort, Alabama

17. On or about June 11, 2021, the Burner Phone connected to a Spanish Fort, Alabama store's WIFI network. While connected, the Burner Phone was used for certain purposes in furtherance of this conspiracy, including, but not limited to, sending photographs of the *Declaration of War* to multiple media outlets.

OVERT ACTS

18. To carry out the manner and means of this conspiracy, the co-conspirators knowingly committed numerous overt acts, including, but not limited to, the following:

- a. On or about May 27, 2021, **JEFFERY SIKES** lit and attempted to light malicious fires in Store One.
- b. On or about May 27, 2021, **ALEXANDER OLSON** lit and attempted to light malicious fires in Store One.
- c. On or about May 27, 2021, M.S. lit and attempted to light malicious fires in Store One.
- d. On or about May 28, 2021, M.S. lit and attempted to light malicious fires in Store Two.
- e. On or about May 28, 2021, **ALEXANDER OLSON** purchased the Burner Phone.
- f. On or about June 4, 2021, M.S. lit and attempted to light malicious fires in Store Three.
- g. On or about June 4, 2021, M.S. lit and attempted to light malicious fires in Store Four.

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

COUNT TWO

Malicious Destruction by Fire

Title 18, United States Code, Section 844(i)

19. On or about May 27, 2021, in the Southern District of Alabama, the defendants,

**JEFFERY SIKES,
SEAN BOTTORFF,
ALEXANDER OLSON,**

aided and abetted by each other and by M.S. did maliciously damage and destroy, and attempted to maliciously damage and destroy, by means of fire, a Walmart store located at 101 East I-65 Service Road South in Mobile, Alabama 36606, and personal and real property, which is used in and affects interstate and foreign commerce, in violation of Title 18, United States Code, Section 844(i).

COUNT THREE
Malicious Destruction by Fire
Title 18, United States Code, Section 844(i)

20. On or about May 28, 2021, in the Southern District of Alabama, the defendant,

ALEXANDER OLSON,


aided and abetted by M.S. did maliciously damage and destroy, and attempted to maliciously damage and destroy, by means of fire, a Walmart store located at 5245 Rangeline Service Road South in Mobile, Alabama 36619, and personal and real property, which is used in and affects interstate and foreign commerce, in violation of Title 18, United States Code, Section 844(i).

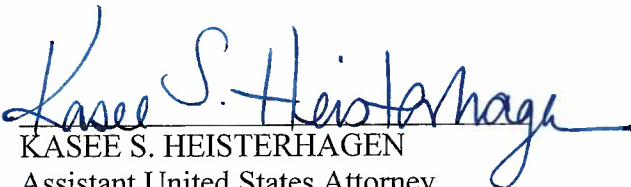
A TRUE BILL

FOREMAN, UNITED STATES GRAND JURY
SOUTHERN DISTRICT OF ALABAMA

SEAN P. COSTELLO
UNITED STATES ATTORNEY

By:


CHRISTOPHER J. BODNAR
Assistant United States Attorney


KASEE S. HEISTERHAGEN
Assistant United States Attorney


SCOTT A. GRAY
Assistant United States Attorney


SEAN P. COSTELLO
Chief, Criminal Division

AUGUST 2022