

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	<u>I N D I C T M E N T</u>
)	
Plaintiff,)	
)	
v.)	CASE NO. _____
)	Title 18, Sections
ROGER LEE DILLON)	2113(b), 2314, 371 and 2,
aka Michael Weaver)	United States Code
)	
NICOLE D. BOYD)	
aka Samantha Capeli,)	
aka Nicole Stuckey,)	
aka Nicki Boyd,)	
aka Nicki Stuckey)	
)	
S. LEE GREGORY)	
aka Sharon Gregory)	
)	
Defendants.)	

COUNT 1

The Grand Jury charges:

On or about November 26, 2007, in the Northern District of Ohio, Eastern Division, the Defendants, ROGER LEE DILLON aka Michael Weaver and NICOLE D. BOYD aka Samantha Capeli, aka Nicole Stuckey, aka Nicki Boyd, aka Nicki Stuckey did take and carry away with intent to steal and purloin, property, checks and

United States currency of a value exceeding one million dollars belonging to Chase Bank, a federally insured banking institution; in violation of Title 18, Section 2113(b), United States Code.

COUNT 2

The Grand Jury further charges:

Sometime during the month of October, 2007, the exact date unknown, up to and including December 1, 2007, in the Northern District of Ohio, Eastern Division and elsewhere, ROGER LEE DILLON aka Michael Weaver, did combine, conspire, agree and confederate with NICOLE D. BOYD aka Samantha Capeli, aka Nicole Stuckey, aka Nicki Boyd, aka Nicki Stuckey and S. LEE GREGORY aka Sharon Gregory, and others unknown to steal over \$5,000 of money, property and checks, some of which currency belonged to Chase Bank, a federally insured banking institution, and to transfer, and to transport said property in interstate commerce from the Northern District of Ohio to the State of West Virginia, in violation of Title 18, Sections 2113(b) and 2314, United States Code.

It was part of the conspiracy that ROGER LEE DILLON aka Michael Weaver worked as a courier and driver for Armored Transportation Systems (AT Systems), an armored car service company located at 986 ½ Tibbetts Wick Road, Liberty, Ohio.

It was further part of the conspiracy that AT Systems was in the business of receiving and delivering large sums of money to federally insured banks and other businesses.

It was further part of the conspiracy that ROGER LEE DILLON aka Michael Weaver was familiar with the security cameras in the AT Systems building and possessed the combination to the safe located at AT Systems in Liberty, Ohio, where checks, property and currency was stored prior to shipment.

It was further part of the conspiracy that ROGER LEE DILLON aka Michael Weaver obtained the access code of another employee to use to gain entrance to the building after hours.

It was further part of the conspiracy that ROGER LEE DILLON aka Michael Weaver, NICOLE BOYD aka Samantha Capeli, aka Nicole Stuckey, aka Nicki Boyd, aka Nicki Stuckey and S. LEE GREGORY aka Sharon Gregory planned to steal cash and property from the safe and transport the stolen property in a truck outside the State of Ohio.

It was further part of the conspiracy that a house in West Virginia was obtained to use as a safe house to unload the stolen property.

OVERT ACTS

In furtherance of the conspiracy and to effect the objectives thereof, the defendants performed Overt Acts in the Northern District of Ohio and elsewhere, including but not limited to the following:

1. During October 2007, the exact date unknown, ROGER LEE DILLON and NICOLE D. BOYD traveled to Pipestem, West Virginia, to look for and obtain a safe house.

2. On November 26, 2007, NICOLE D. BOYD and S. LEE GREGORY approached a Youngstown, Ohio, area used car dealer in order to purchase a 1989 GMC Safari van.
 3. On November 26, 2007, S. LEE GREGORY asked the dealer to remove the rear seats of the Safari.
 4. On November 26, 2007, S. LEE GREGORY traveled in her Oldsmobile Sedan to Pipestem, West Virginia.
 5. During the evening of November 26, 2007, ROGER LEE DILLON and NICOLE D. BOYD did enter the AT Systems facility in Liberty, Ohio, for the purpose of accessing the safe.
 6. On November 27, 2007, ROGER LEE DILLON and NICOLE D. BOYD met S. LEE GREGORY in Pipestem, West Virginia, and unloaded stolen property.
 7. During the last week of November 2007, ROGER LEE DILLON, NICOLE D. BOYD and S. LEE GREGORY counted United States currency in Pipestem, West Virginia.
- All in violation of Title 18, Section 371 United States Code.

COUNT 3

The Grand Jury further charges:

On or about November 26 and November 27, 2007, ROGER LEE DILLON aka Michael Weaver, NICOLE D. BOYD aka Samantha Capeli, aka Nicole Stuckey, aka Nicki Boyd, aka Nicki Stuckey and S. LEE GREGORY aka Sharon Gregory did transport in interstate commerce from Liberty, in the Northern District of Ohio, to Pipestem, in the state of West Virginia, goods, merchandise, securities and

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money of a value exceeding \$7 million, knowing the same to have been stolen, converted or taken by fraud; in violation of Title 18, Section 2314, United States Code.

A TRUE BILL.

Original document- Signatures on file with the Clerk of Court, pursuant to the E-Government Act of 2002

UNITED STATES V. ROGER LEE DILLON, ET AL.

A TRUE BILL.

FOREPERSON

WILLIAM J. EDWARDS
ACTING UNITED STATES ATTORNEY