

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

FILED

SEP 05 2018

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

JOSEPH MALDONADO-PASSAGE,
a/k/a Joseph Allen Maldonado,
a/k/a Joseph Allen Schreibvogel,
a/k/a "Joe Exotic,"

Defendant.

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY Carmela Cook, DEPUTY

CR 18-227 SLP

No. _____

Violation: 18 U.S.C. § 1958(a)

INDICTMENT

The Federal Grand Jury charges:

At all times relevant to this Indictment:

1. Defendant **JOSEPH MALDONADO-PASSAGE** was a resident of the Western District of Oklahoma.
2. "Jane Doe" was a resident of the state of Florida.
3. Beginning at least by February 2014, **MALDONADO-PASSAGE** posted content online, including on Facebook and YouTube websites, containing threats of violence against Jane Doe.

Count 1

(Use of Interstate Commerce Facilities in the Commission of Murder-for-Hire)

4. The Federal Grand Jury incorporates paragraphs 1-3 by reference.
5. At least by early November 2017, **MALDONADO-PASSAGE** inquired of Individual 1 whether Individual 1 would travel to Florida to murder Jane Doe in exchange for a sum of money. Individual 1 told **MALDONADO-PASSAGE** that he would travel to Florida to murder Jane Doe in exchange for a sum of money.
6. On or about November 6, 2017, **MALDONADO-PASSAGE** caused Individual 1 to travel from the Western District of Oklahoma to Dallas, Texas, to obtain a fake identification card for use in a proposed plot for Individual 1 to travel to Florida to murder Jane Doe.
7. On or about November 25, 2017, **MALDONADO-PASSAGE** used the U.S. Postal Service to mail Individual 1's cell phone from the Western District of Oklahoma to Nevada to conceal Individual 1's involvement in a proposed plot to murder Jane Doe in Florida.
8. On or about November 25, 2017, in the Western District of Oklahoma, **MALDONADO-PASSAGE** gave Individual 1 approximately \$3,000 in cash in exchange for Individual 1's agreement to travel to Florida to murder Jane Doe. **MALDONADO-PASSAGE** promised to pay Individual 1 thousands of dollars more after Individual 1 murdered Jane Doe.
9. **MALDONADO-PASSAGE** agreed with Individual 1 that Individual 1 would travel from the Western District of Oklahoma to South Carolina, and then to Florida,

to murder Jane Doe.

10. On or about November 26, 2017, Individual 1 traveled from the Western District of Oklahoma to South Carolina.

11. No physical harm came to Jane Doe as a result of **MALDONADO-PASSAGE**'s proposed plot for her murder.

12. In or about November 2017, in the Western District of Oklahoma and elsewhere,

----- **JOSEPH MALDONADO-PASSAGE,**
a/k/a Joseph Allen Maldonado,
a/k/a Joseph Allen Schreibvogel,
a/k/a "Joe Exotic," -----

caused another person to travel in interstate commerce, used and caused another person to use the mail, and used and caused another person to use any facility of interstate commerce, with intent that the murder of Jane Doe be committed in violation of the laws of the state of Oklahoma and the state of Florida as consideration for the receipt of, and as consideration for a promise and agreement to pay, anything of pecuniary value.

All in violation of Title 18, United States Code, Section 1958(a).

Count 2

(Use of Interstate Commerce Facilities in the Commission of Murder-for-Hire)

13. The Federal Grand Jury incorporates paragraphs 1-3 by reference.

14. Beginning in approximately July 2016, and continuing through approximately March 2018, **MALDONADO-PASSAGE** repeatedly asked Individual 2

whether Individual 2 could find someone to murder Jane Doe in exchange for a sum of money.

15. On or about December 5, 2017, Individual 2 called from his cell phone and spoke with **MALDONADO-PASSAGE** on his cell phone. Individual 2 offered to introduce **MALDONADO-PASSAGE** to a person who would be willing to murder Jane Doe in exchange for a sum of money. **MALDONADO-PASSAGE** agreed to the meeting.

16. On or about December 8, 2017, Individual 2 introduced **MALDONADO-PASSAGE** to an undercover FBI agent, and together the three individuals discussed the details of **MALDONADO-PASSAGE**'s proposed plot to murder Jane Doe.

17. On various dates from December 2017 to March 2018, **MALDONADO-PASSAGE** used his cell phone to speak with Individual 2 on his cell phone about using the undercover FBI agent to murder Jane Doe.

18. No physical harm came to Jane Doe as a result of **MALDONADO-PASSAGE**'s proposed plot for her murder.

19. Beginning at least by December 5, 2017, and continuing through about March 2018, in the Western District of Oklahoma,

----- **JOSEPH MALDONADO-PASSAGE,**
a/k/a Joseph Allen Maldonado,
a/k/a Joseph Allen Schreibvogel,
a/k/a "Joe Exotic," -----

used and caused another person to use any facility of interstate commerce, with intent that the murder of Jane Doe be committed in violation of the laws of the state of Oklahoma and the state of Florida as consideration for the receipt of, and as consideration for a promise

and agreement to pay, anything of pecuniary value.

All in violation of Title 18, United States Code, Section 1958(a).

A TRUE BILL:

A handwritten signature in black ink, appearing to read "William Brown".

FOREPERSON OF THE GRAND JURY

ROBERT J. TROESTER
First Assistant United States Attorney

A handwritten signature in black ink, appearing to read "Amanda Green".

AMANDA GREEN
Assistant U.S. Attorney

CRIMINAL COVER SHEET

U.S. District Court, Western District of Oklahoma

Petty ☐ Misdemeanor ☐ Felony ☒

Case No.

CR 18-227Number of Counts 2 Number of Defendants 1 USAOID No. _____ By: kh**INDICTMENT**Sealed: Yes ☒ No ☐OCDETF: Yes ☐ No ☒Notice ☐ Summons ☐ Writ ☐ Warrant ☒ No Issue

DEFENDANT: JOSEPH MALDONADO-PASSAGE		SEP 05 2018	
Alias(es): Joseph Allen Maldonado Joseph Allen Schreibvogel "Joe Exotic"		Address: Wynnewood, OK 73098	
		Phone: _____	
Age&DOB: 55; xx/xx/1963	SS#: xxx-xx-3850	Juvenile: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Interpreter: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
SEX: M <input checked="" type="checkbox"/> F <input type="checkbox"/>	RACE: White	Language/Dialect: English	

Defendant Status:

<input type="checkbox"/> Not in Custody	Type of Bond Recommended on this Charge:
Bond set at: \$ _____ Date: _____ Current Bond on Other Charge Federal <input type="checkbox"/> State <input type="checkbox"/>	OR <input type="checkbox"/> Cash <input type="checkbox"/> 10% <input type="checkbox"/> Unsecured <input type="checkbox"/> Surety <input type="checkbox"/> Bond in Amount of: \$ _____
<input type="checkbox"/> In Jail at: _____	Under Prisoner/Register No.: _____ Detention <input checked="" type="checkbox"/>

Prior Proceedings or Appearance(s) Before U.S. Magistrate Judge:

Case No. M- _____	Government Motion to Detain: Yes <input type="checkbox"/> No <input type="checkbox"/>
Complaint: Yes <input type="checkbox"/> No <input type="checkbox"/>	Bond Set: _____ Date: _____

Related Case Information:

Previous Case No. _____	Rule 20/Rule 5 from District of: _____
Additional Defendants: Yes <input type="checkbox"/> No <input type="checkbox"/>	Total Number of defendants: SEP 05 2018

Attorney Information:

Defense Counsel:	AUSA: AMANDA GREEN BY CARMELITA REEDER SHINN CLERK, U.S. DISTRICT COURT	
Address:	Phone: 405/553-8700	Fax: 405/553-8888
Phone: _____	Fax: _____	Federal Agent/Agency: US Fish & Wildlife Service
Retained <input type="checkbox"/> CJA Panel <input type="checkbox"/> Public Defender <input type="checkbox"/>	Local Agent/Agency: _____	

Count(s)**USC Citation(s)****Offense(s) Charged****Penalty**

1-2

18 U.S.C. § 1958(a)

Use of interstate commerce
facilities in the commission of a
murder for hireNMT 10 yrs imprisonment; \$250,000 fine, o/b;
3 yrs S/R. If revoked, additional 2 yrs
imprisonment;
\$100 SA

Date:

9/5/18

Signature of AUSA

Amanda Green

800/6-97