

U.S. DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
FILED

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CHRIS R. JOHNSON, CLERK

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

BY

UNITED STATES OF AMERICA)
)
 v.)
)
 BERNIE LAZAR HOFFMAN,)
 also known as Tony Alamo)

No. 4:08CR40020-001

18 U.S.C. § 2

18 U.S.C. §§ 2423(a) and (e)

REDACTED SUPERSEDING INDICTMENT

The Grand Jury charges:

COUNT ONE

In or about September 2004 through and including December 2004, in the Western District of Arkansas, Texarkana Division and elsewhere, **BERNIE LAZAR HOFFMAN, also known as Tony Alamo**, the defendant, aided and abetted by others known and unknown to the grand jury, knowingly transported Jane Doe #1, an individual who had not attained the age of 18 years, in interstate commerce with intent that Jane Doe #1 engage in any sexual activity for which any person can be charged with a criminal offense, namely, Arkansas Code Annotated 5-14-103, Rape; all in violation of Title 18, United States Code, Sections 2423(a) and (e) and 2.

COUNT TWO

In or about August 2005 through and including October 2005, in the Western District of Arkansas, Texarkana Division and elsewhere, **BERNIE LAZAR HOFFMAN, also known as Tony Alamo**, the defendant, aided and abetted by others known and unknown to the grand jury, knowingly transported Jane Doe #1, an individual who had not attained the age of 18 years, in interstate commerce with intent that Jane Doe #1 engage in any sexual activity for which any person can be

charged with a criminal offense, namely, Arkansas Code Annotated 5-14-127, Sexual Assault in the Fourth Degree; all in violation of Title 18, United States Code, Sections 2423(a) and (e) and 2.

COUNT THREE

In or about May 2000 through and including June 2000, in the Western District of Arkansas, Texarkana Division and elsewhere, **BERNIE LAZAR HOFFMAN, also known as Tony Alamo**, the defendant, aided and abetted by others known and unknown to the grand jury, knowingly transported Jane Doe #2, an individual who had not attained the age of 18 years, in interstate commerce with intent that Jane Doe #2 engage in any sexual activity for which any person can be charged with a criminal offense, namely, Arkansas Code Annotated 5-14-103, Rape; all in violation of Title 18, United States Code, Sections 2423(a) and 2.

COUNT FOUR

In or about March 2001 through and including April 2001, in the Western District of Arkansas, Texarkana Division and elsewhere, **BERNIE LAZAR HOFFMAN, also known as Tony Alamo**, the defendant, aided and abetted by others known and unknown to the grand jury, knowingly transported Jane Doe #2, an individual who had not attained the age of 18 years, in interstate commerce with intent that Jane Doe #2 engage in any sexual activity for which any person can be charged with a criminal offense, namely, Arkansas Code Annotated 5-14-103, Rape; all in violation of Title 18, United States Code, Sections 2423(a) and 2.

COUNT FIVE

In or about July 1998, in the Western District of Arkansas, Texarkana Division and elsewhere, **BERNIE LAZAR HOFFMAN, also known as Tony Alamo**, the defendant, aided and abetted by others known and unknown to the grand jury, knowingly transported Jane Doe #3,

an individual under the age of 18 years, in interstate commerce with intent that Jane Doe #3 engage in any sexual activity for which any person can be charged with a criminal offense, namely, Arkansas Code Annotated 5-14-106, Carnal Abuse in the 3rd Degree; all in violation of Title 18, United States Code, Sections 2423(a) and 2.

COUNT SIX

In or about January 1999, in the Western District of Arkansas, Texarkana Division and elsewhere, **BERNIE LAZAR HOFFMAN, also known as Tony Alamo**, the defendant, aided and abetted by others known and unknown to the grand jury, knowingly transported Jane Doe #3, an individual under the age of 18 years, in interstate commerce with intent that Jane Doe #3 engage in any sexual activity for which any person can be charged with a criminal offense, namely, Arkansas Code Annotated 5-14-106, Carnal Abuse in the 3rd Degree; all in violation of Title 18, United States Code, Sections 2423(a) and 2.

COUNT SEVEN

In or about March 1994 through and including April 1994, in the Western District of Arkansas, Fort Smith Division and elsewhere, **BERNIE LAZAR HOFFMAN, also known as Tony Alamo**, the defendant, aided and abetted by others known and unknown to the grand jury, knowingly transported Jane Doe #4, an individual under the age of 18 years, in interstate commerce with intent that Jane Doe #4 engage in any sexual activity for which any person can be charged with a criminal offense, namely, Arkansas Code Annotated 5-14-106, Carnal Abuse in the 3rd Degree; all in violation of Title 18, United States Code, Section 2423 and 2.

COUNT EIGHT

In or about April 1994 through and including May 1994, in the Western District of Arkansas, Fort Smith Division and elsewhere, **BERNIE LAZAR HOFFMAN, also known as Tony Alamo**, the defendant, aided and abetted by others known and unknown to the grand jury, knowingly transported Jane Doe #4, an individual under the age of 18 years, in interstate commerce with intent that Jane Doe #4 engage in any sexual activity for which any person can be charged with a criminal offense, namely, Arkansas Code Annotated 5-14-106, Carnal Abuse in the 3rd Degree; all in violation of Title 18, United States Code, Section 2423 and 2.

COUNT NINE

In or about May 1994 through and including June 8, 1994, in the Western District of Arkansas, Fort Smith Division and elsewhere, **BERNIE LAZAR HOFFMAN, also known as Tony Alamo**, the defendant, aided and abetted by others known and unknown to the grand jury, knowingly transported Jane Doe #4, an individual under the age of 18 years, in interstate commerce with intent that Jane Doc #4 engage in any sexual activity for which any person can be charged with a criminal offense, namely, Arkansas Code Annotated 5-14-106, Carnal Abuse in the 3rd Degree; all in violation of Title 18, United States Code, Section 2423 and 2.

COUNT TEN


In or about July 2005 through and including September 21, 2005, in the Western District of Arkansas, Texarkana Division and elsewhere, **BERNIE LAZAR HOFFMAN, also known as Tony Alamo**, the defendant, aided and abetted by others known and unknown to the grand jury, knowingly transported Jane Doe #5, an individual who had not attained the age of 18 years, in interstate commerce with intent that Jane Doc #5 engage in any sexual activity for which any

person can be charged with a criminal offense, namely, Arkansas Code Annotated 5-14-124, Sexual Assault in the First Degree; all in violation of Title 18, United States Code, Section 2423(a) and (e) and 2.

A True Bill.

/s/ Foreperson
Foreperson

ROBERT C. BALFE
UNITED STATES ATTORNEY

By: 
Kyra E. Jenner
Assistant U. S. Attorney
Arkansas Bar No. 2000041
P. O. Box 1524
Fort Smith, AR 72902
Phone: 479-783-5125