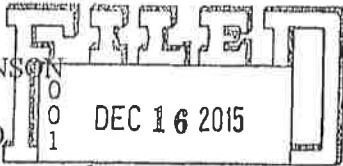


STATE OF INDIANA)
) SS: IN THE KOSCIUSKO CIRCUIT COURT
COUNTY OF KOSCIUSKO) 2015 CALENDAR TERM

STATE OF INDIANA

VS

KEVIN L. BRONSON
and
MARK H. SOTO,



CAUSE NUMBER: 43C01-1510-MC-170
CAUSE NUMBER: 43C01-1602FS-147

INDICTMENT IN TEN COUNTS

Anna Jorpy
CLERK KOSCIUSKO CIRCUIT COURT

The Grand Jury of the County of Kociusko, being duly sworn, empaneled and charged in the name and upon the authority of the State of Indiana, and upon their oath and affirmation do charge and present that on or about the 16th day of October, 2012 through and including May 19, 2015 at and within Kosciusko County, Indiana:

**COUNT I:
CORRUPT BUSINESS INFLUENCE
C Felony
Level 5 Felony
I.C. 35-45-6-2-(1)**

Kevin L. Bronson and Mark H. Soto did knowingly or intentionally receive proceeds, to wit: money from individuals, said proceeds being directly or indirectly derived from a pattern of racketeering activity, to wit: a pattern and series of acts of intimidation against various individuals, and the said Kevin L. Bronson and Mark H. Soto did use or invest those proceeds or the proceeds derived from them to operate an enterprise, to wit: Young Dragon Enterprises, LLC.

The Grand Jury further charges and presents that on or about the 16th day of October, 2012, through and including May 19, 2015 at and within Kosciusko County, Indiana:

**COUNT II:
CORRUPT BUSINESS INFLUENCE
C Felony
Level 5 Felony
I.C. 35-45-6-2(2)**

Kevin L. Bronson and Mark H. Soto through a pattern of racketeering activity, to wit: a pattern and series of acts of intimidation, did knowingly or intentionally acquire or maintain, either directly or indirectly, control of an enterprise, to wit: Young Dragon Enterprises, LLC.

A TRUE BILL

The Grand Jury further charges and presents that on or about the 16th day of October, 2012, through and including May 19, 2015 at and within Kosciusko County, Indiana:

**COUNT III:
CORRUPT BUSINESS INFLUENCE
C Felony
Level 5 Felony
I.C. 35-45-6-2(3)**

Kevin L. Bronson and Mark H. Soto were associated with an enterprise, to wit: Young Dragon Enterprises, LLC, and both Kevin L. Bronson and Mark H. Soto knowingly or intentionally conducted or otherwise participated in the activities of that enterprise through a pattern of racketeering activity, to wit: a pattern or series of acts of intimidation against various individuals.

The Grand Jury further charges and presents that on or about the 2nd day of June, 2011 and continuing through and including May 19, 2015, at and within Kosciusko County, Indiana:

**COUNT IV:
INTIMIDATION
D Felony
Level 6 Felony
I.C. 35-45-2-1(a)(1) or (2)
I.C. 35-45-2-1(b)(1)(A)**

Kevin L. Bronson and Mark H. Soto communicated threats to another person, to wit: David Baker, with the intent that David Baker engage in conduct against his will to wit: provide extensive legal services and the preparation of documents aimed at securing a movie contract and/or a book contract without payment, or that David Baker be placed in fear of retaliation for a prior lawful act, declining to provide legal services and the preparation of documents with the objective of obtaining a movie or book contract, and said threat was to commit a forcible felony, to wit: beatings or the killing of David Baker or members of his family.

The Grand Jury further charges and presents that on or about 2nd day of January, 2013, at and within Kosciusko County, Indiana:

**COUNT V:
INTIMIDATION
D Felony
I.C. 35-45-2-1(a)(1) or (2)
I.C. 35-45-2-1(b)(1)(A)**

A TRUE BILL

Kevin L. Bronson and Mark H. Soto communicated threats to another person, to wit: Nate McLaurin, with the intent that Nate McLaurin be placed in fear of retaliation for a prior lawful act, to wit: asking for contact information of Kevin Bronson's superior in the Aryan Brotherhood, and to thereby cause Nate McLaurin to engage in conduct against his will, to wit: have his family transported from their home in the middle of the night to a place of safety, and to remain awake in his home to await the threatened commission of a forcible felony, to wit: the beating or killing of Nate McLaurin or members of his family.

The Grand Jury further charges and presents that on or about the 2nd day of January, 2013 through and including December 31, 2013, at and within Kosciusko County, Indiana:

**COUNT VI:
INTIMIDATION
D Felony
I.C. 35-45-2-1(a)(1)
I.C. 35-45-2-1(b)(1)(A)**

Kevin L. Bronson and Mark H. Soto communicated threats to another person, to wit: Nate McLaurin, with the intent that Nate McLaurin, engage in conduct against his will, to wit: secure periodic payments from Tyler Silveus to Kevin L. Bronson and Young Dragon Enterprises, LLC totaling \$84,012.50, said payments intended to prevent a threatened forcible felony, to wit: the beating or killing of Nate McLaurin or members of Nate McLaurin's family.

The Grand Jury further charges and presents that on or about the 31st day of December, 2013, at and within Kosciusko County, Indiana:

**COUNT VII:
INTIMIDATION
D Felony
I.C. 35-45-2-1(a)(1)
I.C. 35-45-2-1(b)(1)(A)**

Kevin L. Bronson communicated a threat to another person, to wit: Brian Hickerson, with the intent that Brian Hickerson engage in conduct against his will, to wit: had his two children pack their personal belongings to be ready to leave their home on a moment's notice while the said Brian Hickerson stood guard the entire night, and said threat was the commission of a forcible felony, to wit: the beatings or killing of Brian Hickerson or members of his family.

A TRUE BILL

The Grand Jury further charges and presents that throughout November and December 2014, at and within Kosciusko County, Indiana:

**COUNT VIII:
INTIMIDATION
Level 5 Felony
I.C. 35-45-2-1(a)(1)
I.C. 35-45-2-1(b)(1)(A)**

Kevin L. Bronson communicated threats to another person, to wit: Corey Greene, with the intent that Corey Greene engage in conduct against his will, to wit: provide payments of money totaling more than \$500 to Kevin L. Bronson, and said threat was the commission of a forcible felony, to wit: the beatings or killing of Corey Greene.

The Grand Jury further charges and presents that on or about November, 2012, at and within Kosciusko County, Indiana:

**COUNT IX:
INTIMIDATION
D Felony
I.C. 35-45-2-1(a)(1)
I.C. 35-45-2-1(b)(1)(A)**

Kevin L. Bronson communicated a threat to another person, to wit: James King, with the intent that James King engage in conduct against his will, to wit: cash a check made payable to James King for construction work completed, and to return (kickback) cash to Kevin L. Bronson a substantial portion of the proceeds of said check, with said threat being the commission of a forcible felony, to wit: breaking the legs of James King.

The Grand Jury further charges and presents that from on or about the 18th day of March, 2013 until on or about February, 2015, at and within Kosciusko County, Indiana:

**COUNT X:
INTIMIDATION
D Felony
Level 6
I.C. 35-45-2-1(a)(1)
I.C. 35-45-2-1(b)(1)(A)**

Kevin L. Bronson communicated threats to another person, to wit: Dr. Steven Hollar, with the intent that Dr. Steven Hollar engage in conduct against his will, to wit: perform professional dental services without payment, with said threat being the commission of a forcible felony, to wit: the beating of Dr. Steven Hollar.

A TRUE BILL

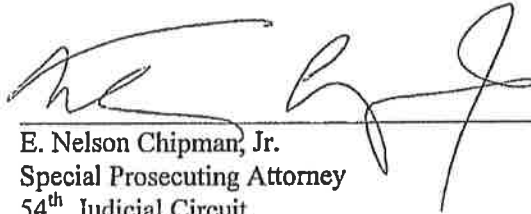
Dated this 16th day of December, 2015.

WITNESSES:

Chief Scott Whitaker
Det. Sgt. Paul Heaton
Asst. Chief Bryan Sherwin
Dr. Steven Hollar
David Baker
Nate McLaurin
Tyler Silveus
Brian Hickerson
Corey Greene
James King



Grand Jury Foreperson



E. Nelson Chipman, Jr.
Special Prosecuting Attorney
54th Judicial Circuit

A TRUE BILL