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FEB 27 2008	
CLERK U.S. DISTRICT COURT DISTRICT OF ARIZONA	
BY	DEPUTY

United States District Court

DISTRICT OF ARIZONA

UNITED STATES OF AMERICA

V.

JASON B. ALVORD
 JARED P. ALVORD
 SCOTT A. MORRIS
 AJIA J. GRECO
 JON E. BILBAY
 WILLIAM J. KECK

AMENDED CRIMINAL COMPLAINT
 CASE NUMBER: 08-04034M-PCT-MEA

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief.

Count 1

On February 24, 2008, and within the special maritime and territorial jurisdiction of the United States, Jason B. Alvord, Jared P. Alvord, Scott A. Morris, Aiji J. Greco, Jon E. Bilbay and William J. Keck did assault a Michael Petrillo by striking beating or wounding him.

In violation of Title 18, United States Code, Section 113 (a)(4) and 2.

Count 2

On February 24, 2008, and within the special maritime and territorial jurisdiction of the United States, Jason B. Alvord, Jared P. Alvord, Scott A. Morris, Aiji J. Greco, Jon E. Bilbay and William J. Keck did assault a Daniel Diaz by striking beating or wounding him.

In violation of Title 18, United States Code, Section 113 (a)(4) and 2.

Count 3

On February 24, 2008, and within the special maritime and territorial jurisdiction of the United States, Jason B. Alvord, Jared P. Alvord, Scott A. Morris, Aiji J. Greco, Jon E. Bilbay and William J. Keck did by force, violence, and intimidation take money and property from Michael Petrillo.

In violation of Title 18, United States Code, Section 2111 and 2.

Count 4

On February 24, 2008, and within the special maritime and territorial jurisdiction of the United States, Jason B. Alvord, Jared P. Alvord, Scott A. Morris, Aiji J. Greco, Jon E. Bilbay and William J. Keck did by force, violence, and intimidation take money and property from Daniel Diaz.

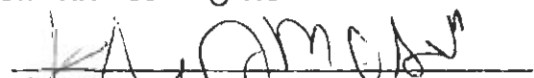
In violation of Title 18, United States Code, Section 2111 and 2.

I further state that I am a commissioned Special Agent and that this complaint is based on the following facts:

See attached AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT (Statement of Probable Cause).

AUTHORIZED BY : Camille Bibles

Continued on the attached sheet and made a part hereof: Yes No


 Signature of Complainant

Sworn to before me and subscribed in my presence,

 Date **February 27, 2008** at **Flagstaff, Arizona**

 Name & Title of Judicial Officer **Mark E. Aspey** City and State

 U. S. Magistrate Judge Signature of Judicial Officer

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

United States v. Jason B. Alvord, Jared P. Alvord, Jon E. Bilbay, Ajia J. Greco, William J. Keck, and Scott A. Morris

I, Kristy Jean McGee, first being duly sworn depose and stated as follows: I have been a Special Agent with the National Park Service since December of 2005; prior to that I worked as a Law Enforcement Park Ranger for the National Park Service for five years. I have conducted many investigations that involved violent assaults and theft of property. The information in this affidavit is based on my personal knowledge and information provided to me by other law enforcement officers and individuals.

1. On February 24, 2008, and within the boundries of Lake Mead National Recreation Area, an area of special maritime and territorial jurisdiction, Jason B. Alvord, Jared P. Alvord, Jon E. Bilbay, Ajia J. Greco, William J. Keck, and Scott A. Morris did, assault by striking, beating, and wounding, Michael E. Petrillo and Daniel M. Diaz, and used force, violence and intimidation to take approximately eighteen hundred dollars in United States currency and other property from them.
2. At approximately 0230 hours on February 24, 2008, Park Rangers at Lake Mead National Recreation Area responded to a report made by Mike E. Petrillo and Daniel M. Diaz. They reported they were beaten and robbed by a group of people camping near the cove at the end of the access road to Kingman Wash. Petrillo and Diaz suffered from substantial head and facial trauma as well as several other injuries. They had open wounds and swelling to their faces. Their clothes were covered with blood. Petrillo's boat had a considerable amount of blood in it.
3. Petrillo reported approximately \$1000.00 in cash was taken from him while the people were beating him. He stated after he left the scene he noticed several other items were missing from the boat including: a Sony digital camera valued at approximately \$1000.00, a Swiss Army watch, a GPS unit, a night vision monocular, his keys, and a 4-D-cell Maglight. Petrillo stated he thought someone used his Maglight to beat him in the head.

4. Diaz reported approximately \$800.00 in cash was taken from him, along with his prescription eye glasses, his cell phone, a sweatshirt, the tee-shirt he was wearing, his wallet containing two visa cards, his drivers license, his keys, and a blue Smith and Wesson knife.

5. Petrillo stated he took Diaz out on his boat because Diaz's wife was having a baby shower at his house and men were not to be there. The men went Kingman Wash because that was an area Petrillo fished as a child. He stated when they trolled into the cove they saw a camp with a fire and several 4-wheel drive vehicles. According to Petrillo, the people flashed their headlights from the vehicles at the men as if to invite them over. When they brought the boat ashore a man driving the red Blazer and another man in a white SUV drove through the water around the backside of the boat. He stated they got out and began to talk to the men about their trucks. He described the group as having approximately four sport utility type vehicles, including a black Suburban, a white truck, a white SUV, a red Blazer, and a Honda dirt bike. Petrillo stated all the vehicles had "lift kits". He reported there were approximately seven men, two women and a child at the camp.

6. Petrillo stated Diaz walked toward the campfire while he remained closer to the beach talking to a man wearing a large white hat. He thought the man's name was Jon. Petrillo said that while he was talking to Jon something came from behind him and slammed him in the head and back: he stated he was hit so hard he flew four feet into the air before landing on the ground. Petrillo said that while he was on the ground people began kicking and punching him and someone was hitting him with a maglight. He thought the maglight was his. As the people continued beating him, Petrillo felt them going through his pockets and heard them telling each other to get in his pockets to get his money. He was unable to tell who was speaking. As the beating continued Petrillo saw Diaz lying near him, unconscious, with a bloody face. Petrillo continued trying to protect himself by covering his head with his hands, and thought the assault lasted for about seven minutes. He thought the people beating him were getting tired because the kicking and punching began to slow down. Petrillo stated he looked up and saw man looking in his wallet and saying that it was empty. At that point Petrillo swatted his wallet out of the man's hand.

7. Petrillo stated the stocky man with the black hat and tattooed eyebrows, later identified as Jason Alvord, seemed to be in charge and told the group to stop. Jason Alvord walked over to Diaz, shined the flashlight in his face, and said he was still unconscious. Petrillo managed to get

to his feet and assist Diaz as he was regaining consciousness. Jason Alvord then instructed Diaz and Petrillo not to report to the police. Jason Alvord then made Petrillo and Diaz give him their cell phones and keys. Petrillo stated Jason Alvord took their pocket knives and became angry that they had knives. Petrillo said Jason Alvord talked to him for almost fifteen minutes saying, "We don't have a problem here, do we." Petrillo stated he was cooperative with Jason Alvord and told him he was going to go home and that would be the end of it. Petrillo said he told Jason Alvord he understood why they were upset with his friend and Petrillo apologized to him so they could leave. Petrillo said he was trying to appease Jason Alvord even though he knew Diaz did not do anything wrong. He stated if he had not been so calm they would have killed them. After Petrillo had convinced Jason Alvord they would not contact the police Jason Alvord let them get on their boat and leave.

8. Petrillo and Diaz immediately went to the Las Vegas Boat Harbor where the security officers called Park Dispatch. The rangers responded and Petrillo described the men as having numerous tattoos on their arms and necks and one as having tattoos on his eyebrows. He said he thought one was a diesel mechanic and another a tattoo artist. He stated the woman who was beating him was wearing a red, white, and blue bandanna. Petrillo said the adults were white between the ages of twenty-five and thirty-five. After giving their report Diaz was transported to the hospital via ambulance. Petrillo refused ambulance transport and was transported to the hospital by his son.

9. At approximately 0500 hours several Law Enforcement Park Rangers and I arrived at a camp at the location Petrillo and Diaz described. There were no other camps at the cove. There was blood on the rocks and dirt in the campsite area covering an area approximately fifteen feet across and thirty feet long. There were three "lifted" vehicles, a black Suburban, a white F-150, and a white Suburban. We called the individuals out from the vehicles to conduct field interviews.

10. An individual identified as Scott A. Morris had blood on his hands. An individual identified as Jared P. Alvord had dried blood on his pants and his hands; he also had a cut on the top of his head that measured approximately three inches long and a half inch wide. An individual identified as Jason B. Alvord had dried blood on his pants and on the gloves he was wearing. Ajia J. Greco had blood on her sweatshirt. Jon E. Bilbay had blood on his hands and on his boots. There was a full size Pitt Bull dog and an eleven year old girl in the Suburban with Greco and Jason Alvord.

11. I interviewed Bilbay at the Boulder Beach Ranger Station. He stated there were two people at the camp when the men were assaulted who were not present when we arrived on scene; a male and a female. He described the female as having red hair and the male as being in his twenties. Bilbay stated he thought the male was named Billy who later was identified as William Keck. Bilbay described the red and white lifted Blazer that Keck drove. I had seen a vehicle matching that description parked in the parking area approximately a half mile away from the campsite when we made our initial contact with the group. Bilbay stated two men came to the camp via boat. Bilbay stated Keck punched one of the men and "knocked him out" then yelled to the others "get his friend". He (Bilbay) further stated Jason Alvrod, Jared Alvrod, Ajia J. Greco, Scott Morris and William Keck attacked the other man. He stated they hit and kicked him. Bilbay stated Greco was swinging a Maglight and everyone else was punching and kicking the men. Bilbay stated "Hammer" (Jason Alvrod) instructed everyone else to go away then walked the men back to their boat. Bilbay stated "Hammer" (Jason Alvrod) talked with the men and they left. Bilbay denied knowing anything about the men being robbed. He stated when the men left he and his daughter went to sleep. Bilbay stated I could interview his daughter.

12. I interviewed Bilbay's daughter with her grandmother, Blanche Bilbay, present. The girl stated the female with red hair was named Vanessa. She stated she did not know the name of Vanessa's boyfriend, or Hammer's brother. She said they called one of the guys Checks, who was later identified as Scott Morris. Bilbay's daughter stated Hammer, later identified as Jason Alvrod, was the "leader". She stated Vanessa's boyfriend (Keck) punched one of the men because he was "creeping Vanessa out". She said the man was "knocked out" and Vanessa's boyfriend yelled to the others to get the friend. She stated she and Vanessa were the only people at the camp who did not participate in "beating up" the men. She said her father, Bilbay, was also kicking and punching the men. She stated Greco was hitting the man with a flashlight and Greco accidentally hit Hammer's brother in the head with it. She stated Greco and Hammer took money and other things from the men.

13. I obtained digital surveillance footage from the Hoover Dam showing a red and white Chevy matching the description of the vehicle I had seen near the camp. The vehicle was registered to William John Keck.

14. On February 26, 2008, Special Agent Michael Blandford and I went to Keck's residence. I interviewed Keck and his girlfriend Vanessa Montgomery at their residence in Las Vegas. Keck

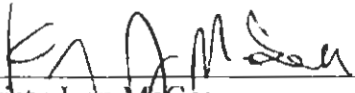
stated he went to the lake to meet his friend Cheeks (Scott Morris). He described Cheeks as being tall and thin and having a tattoo on the back of his head that read "FUCK YOU". Keck stated it was after dark when he and Montgomery arrived at the campsite. He stated he did not know anyone else at the party. Keck stated they were driving their trucks in the lake when a boat with two men arrived around midnight. He stated the other people at the party said they were afraid the men were "cops" and he heard a couple of the guys talking about the men having money. Keck stated Montgomery told him one of the men "creeped her out." Keck stated he told the man to leave and the man told him he should leave. Keck stated he punched the man in temple and the man fell backward; Keck said he could still see white in the man's eyes so he punched him three more times as he fell to the ground. Keck stated his punch knocked the man unconscious and he dragged the man approximately 25 yards away from where he was lying. He said while he dragged the man he yelled to Jason Alvrod, Jared Alvrod, Jon E. Bilbay, Ajia J. Greco, and Scott Morris to "get his friend". Keck stated the rest of the people "jumped" Petrillo. Keck stated he went inside the tent with Montgomery and the girl. He said the girl at the camp was using a flashlight and everyone else was beating the man with their fists. He said he heard them yelling, "get their money" and "get in their pockets". Keck stated Hammer was their leader and he was telling everyone else what to do with the property and money. Keck stated the man he knocked out was unconscious for approximately thirty-minutes. He said during that time Hammer was "negotiating" with the other man. Keck stated Hammer took their cell phones, removed the memory cards, and broke them. He stated they took their car keys and instructed them not to call the police. Keck also said the man convinced Hammer they were not going to report anything. He stated Hammer let the men get into their boat and leave. Keck denied taking any money or property from the men. He stated he and Montgomery left the campsite. Keck stated they slept in his car and left around six in the morning. Keck stated he sent a text message to Scott Morris the next day and asked him how much money he got off of the men.

15. During the search incident to arrest a stack of cash totaling \$543.00 and Diaz's drivers license was found in one of the socks Morris was wearing; five of the bills had visible blood on them. Jason Alvrod had \$530.00 cash in his possession; six of the bills had visible blood on them. Bilbay had \$1,020.00 cash in his possession; he also a bag that contained approximately 0.27 ounces of marijuana in his vehicle. Greco had \$370.00 cash in her possession. During the vehicle inventory of the black Suburban Jason Alvrod and Greco occupied, a blue handled Smith and Wesson knife was found. When shown a picture of the knife Diaz identified it as his.

16. Petrillo suffered from contusions to his head, a broken nose, a tooth knocked out, and another tooth cut through his lip. He had to get stitches in his chin, lip, and nose, and staples across his scalp. He is also bruised on other areas of his body.

17. Diaz suffered from several contusions to his head, a broken nose, lacerations and bruises on his lips. He has a black eye. He had to get staples on his head. He is also bruised on several other areas of his body. Diaz will have to have surgery on his right hand.

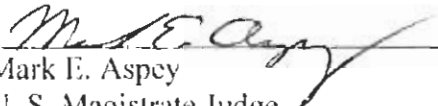
I declare under the penalty of perjury that the information set forth above is true and correct to the best of my knowledge and belief.



Kristy Jean McGee
Special Agent
Lake Mead National Recreation

Area

Sworn before me this 27th day of February, 2008



Mark E. Aspy
U. S. Magistrate Judge