

CJB/KSH

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

UNITED STATES OF AMERICA

v.

JEFFERY SIKES

a.k.a. "Kenneth Allen"

SEAN BOTTORFF

a.k.a. "Sean McFarland"

MICHAEL BOTTORFF

QUINTON OLSON

ALEXANDER OLSON

CRIM. NO. 22-0020-TFM
USAO NO. 21R00308

VIOLATIONS:

18 USC § 844(n)

18 USC § 844(i)

FILED UNDER SEAL

FILED IN OPEN COURT
FEB 23 2022
CHARLES R. DIARD, JR.
CLERK

INDICTMENT**THE GRAND JURY CHARGES:****INTRODUCTION**

1. **JEFFERY SIKES**, age 40, of Kearney, Nebraska is a federal fugitive. In April 2017, **JEFFERY SIKES** pleaded guilty to wire fraud in the District of Nebraska. Prior to his January 2018 sentencing hearing, **JEFFERY SIKES** disappeared along with his wife and an unrelated adult female. A federal warrant was issued for his arrest. **JEFFERY SIKES** currently lives in Gulf Shores, Alabama and uses the alias "**Kenneth Allen**."

2. **SEAN BOTTORFF**, age 37, of Kearney, Nebraska is the brother-in-law of **JEFFERY SIKES**. **SEAN BOTTORFF** and his wife disappeared from Nebraska around the same time **JEFFERY SIKES** disappeared. **SEAN BOTTORFF** currently lives in Gulf Shores, Alabama and uses the alias "**Sean McFarland**."

3. **MICHAEL BOTTORFF**, age 21, of Kearney, Nebraska is the stepson of **SEAN BOTTORFF**. After his mother and stepfather disappeared in late 2017, **MICHAEL BOTTORFF** lived with his high school classmate **QUINTON OLSON** in Nebraska. **MICHAEL BOTTORFF** currently lives in Gulf Shores, Alabama.

4. **QUINTON OLSON**, age 21, of Kearney, Nebraska is a high school friend of **MICHAEL BOTTORFF**. He currently lives in Gulf Shores, Alabama.

5. **ALEXANDER OLSON**, age 23, of Kearney, Nebraska is the older brother of **QUINTON OLSON**. He currently lives in Gulf Shores, Alabama.

6. At the time of the malicious fires discussed herein, **JEFFERY SIKES**, **SEAN BOTTORFF**, **MICHAEL BOTTORFF**, **QUINTON OLSON**, and **ALEXANDER OLSON** lived with each other and three adult females in a rental house in Lillian, Alabama.

COUNT ONE
Conspiracy to Maliciously Destroy by Fire
Title 18, United States Code, Section 844(n)

7. Beginning before May 27, 2021, and continuing at least through on or about June 11, 2021, in the Southern District of Alabama, and elsewhere, the defendants,

JEFFERY SIKES,
SEAN BOTTORFF,
MICHAEL BOTTORFF,
QUINTON OLSON, and
ALEXANDER OLSON

did knowingly, willfully, and unlawfully combine, conspire, confederate, and agree with each other and others, both known and unknown to the grand jury, to maliciously damage and destroy, and attempt to damage and destroy, by means of fire, buildings and other personal and real property as described below used in activities affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 844(i).

OBJECTIVE OF THE CONSPIRACY

8. The objective of this conspiracy was to affect interstate and foreign commerce by maliciously setting fires to damage and destroy Walmart stores and the property within them. Specifically, the fires were maliciously set to force Walmart, Inc. to meet demands related to interstate and foreign commerce set forth by the conspirators in their manifesto (identified herein as "The Walmart Manifesto").

MANNER AND MEANS OF THE CONSPIRACY

9. To achieve the conspiracy's objective, multiple conspirators maliciously set fires inside four Walmart stores during regular business hours while customers, vendors, and employees were present inside and outside the stores.

10. Specifically, the manner and means of this conspiracy included, but were not limited to, the following events:

Malicious Fires at Store One — Mobile, Alabama

11. On May 27, 2021, **JEFFERY SIKES**, **ALEXANDER OLSON**, and a female co-conspirator identified herein as FEM-A¹ walked into the parking lot of the Walmart located on the I-65 Service Road in Mobile, Alabama (herein, "Store One"). All three coconspirators were heavily disguised.

12. At 1:54 pm,² all three coconspirators entered Store One, **JEFFERY SIKES** via the garden center entrance and **ALEXANDER OLSON** and FEM-A through a front entrance.

13. After entering, all three moved around Store One separately until 2:01 pm when they briefly converged in the outdoor goods section.

14. At 2:06 pm, surveillance footage shows FEM-A pushing a shopping cart with a bottle of lighter fluid in it.

15. At 2:11 pm, **JEFFERY SIKES** took a bottle of lighter fluid from a display rack and handed it to **ALEXANDER OLSON**.

¹ This indictment refers to unidentified co-conspirators who appeared at the malicious fires described herein. For clarity, the designations — *i.e.*, FEM-A, FEM-B, etc. — indicate each appearance by an unidentified co-conspirator, but these designations do not mean that each instance necessarily involved a different person. For example, FEM-A and FEM-B may be, but do not have to be, the same unidentified co-conspirator.

² All times and phone call lengths in this indictment are approximate.

16. At 2:20 pm, **JEFFERY SIKES** sprayed lighter fluid onto a clothing rack in the men's clothing section. Four minutes later, surveillance footage shows smoke coming from the area where **JEFFERY SIKES** sprayed the lighter fluid.

17. Between 2:13 pm and 2:27 pm, FEM-A made multiple trips into the men's clothing section. During one trip, surveillance footage shows a pair of brown pants in FEM-A's cart. Walmart Security later found these brown pants in the men's clothing section doused with lighter fluid and with burn marks.

18. At 2:31 pm, **ALEXANDER OLSON** sprayed lighter fluid onto rags in the hardware section and ignited them.

19. At 2:26, 2:32, and 2:33 pm, respectively, **JEFFERY SIKES**, FEM-A, and **ALEXANDER OLSON** each exited Store One, walked out of the parking lot, and headed east.

20. **MICHAEL BOTTORFF**'s minivan was near Store One during the time of the malicious fires.

Malicious Fire at Store Two— Mobile, Alabama

21. On May 28, 2021, **ALEXANDER OLSON** and a female co-conspirator identified herein as FEM-B walked from the direction of Noble Drive and entered the rear loading dock area of the Walmart located on Rangeline Road in Mobile, Alabama (herein, "Store Two"). Both were heavily disguised.

22. At 3:22 and 3:24 pm, respectively, FEM-B and **ALEXANDER OLSON** entered Store Two through the garden center entrance. Initially, they moved around the store separately. While moving separately, FEM-B entered the bathroom twice and can be seen on surveillance footage putting on gloves.

23. At 3:31 pm, FEM-B and **ALEXANDER OLSON** briefly converged in the pet food section before splitting up and walking in different directions.

24. At 3:33 pm, FEM-B walked into the hardware section and lit a fire. FEM-B left

the section less than a minute later as smoke and flames erupted from the hardware section.

25. At 3:35 pm, FEM-B exited Walmart via the garden center, walked behind Store Two, and then back towards Noble Drive.

26. Between 3:35 and 3:36, **ALEXANDER OLSON** walked towards the front exit. When customers started noticing the smoke and flames, **ALEXANDER OLSON** ran out the exit.

27. At 3:38 pm, surveillance footage shows **ALEXANDER OLSON** walking behind Store Two towards Noble Drive as customers and employees are evacuating the store.

28. At 3:53 pm, **ALEXANDER OLSON** called **SEAN BOTTORFF** for 2 minutes and 37 seconds. At the time of this call, **ALEXANDER OLSON's** phone was connected to the cell tower nearest to Store Two.

29. **MICHAEL BOTTORFF's** minivan was near Store Two during the time of the malicious fire.

Burner Phone Purchase — Daphne, Alabama

30. Less than 90 minutes after the malicious fire was set at Store Two, **ALEXANDER OLSON** entered the Walmart located on Highway 98 in Daphne, Alabama.

31. **ALEXANDER OLSON** used cash to purchase a Tracfone, identified herein as the "Burner Phone," and then used his personal cell phone to call **SEAN BOTTORFF** for 1 minutes and 3 seconds. Several minutes after this call, surveillance footage shows **ALEXANDER OLSON** leaving the Daphne Walmart parking lot in **MICHAEL BOTTORFF's** minivan.

32. Less than two minutes after leaving the Daphne Walmart, **ALEXANDER OLSON** called **MICHAEL BOTTORFF** for 2 minutes and 35 seconds. Another call from **ALEXANDER OLSON** to **SEAN BOTTORFF** occurred approximately ten minutes later.

The Burner Phone First Used — Daphne, Alabama

33. Several hours after **ALEXANDER OLSON** purchased the Burner Phone, the Burner Phone connected to free WIFI at a motel located approximately 2 miles north of the Daphne

Walmart on Highway 98.

34. While connected to the motel's free WIFI, the Burner Phone was used to create the Gmail account theveteransorder@gmail.com. All e-mails discussed in this indictment as having been sent using the Burner Phone were sent from this e-mail address.

35. After creating the Gmail account, the Burner Phone's camera was used to take pictures of a six-page document identified herein as "The Walmart Manifesto." Supposedly written by a group called "*The Veterans Order*," the document is officially entitled "*Declaration of War and Demands for the People*." It references the malicious fires, makes a series of demands on Walmart related to the company's interstate and foreign commerce business practices, and threatens further malicious fires if Walmart does not comply with the demands. It is signed with a seal pressed into melted red wax.

36. After taking pictures of The Walmart Manifesto, the Burner Phone was used to look up various local news station in Mobile, Alabama.

37. At 11:01 pm, the Burner Phone was used to send an e-mail to a local Mobile news station. The e-mail, entitled "*The Veterans Order*" included pictures of The Walmart Manifesto as attachments, but did not contain any message in the e-mail itself.

38. Four minutes after this first local news station was contacted, **MICHAEL BOTTORFF** twice attempted to call **ALEXANDER OLSON**.

39. Between 11:27 pm and 11:41 pm, the Burner Phone was used to send three similar e-mails to local Mobile news stations. The e-mails had no messages but contained as attachments the pictures of The Walmart Manifesto taken by the Burner Phone an hour earlier.

40. Less than one minute after the final e-mail was sent using the Burner Phone, **MICHAEL BOTTORFF** called **ALEXANDER OLSON** for 27 seconds. Thereafter, the Burner Phone disconnected from the motel's free WIFI.

Malicious Fires at Store Three— Gulfport, Mississippi

41. One week later, on June 4, 2021, a third series of malicious fires occurred at the Walmart located on Highway 49 in Gulfport, Mississippi (herein, “Store Three”).

42. At 1:21 pm, a heavily disguised male and female, identified herein as MALE–A and FEM–C, walked together across a field towards a dance school located behind Store Three.

43. At 1:25 and 1:27 pm, respectively, MALE–A and FEM–C entered Store Three via different front entrances, and the two separately walked around the store.

44. Between 1:27 and 1:33 pm, FEM–C was in both the home goods and the sporting goods sections. While there, FEM–C set fires in each section.

45. At 1:35 pm, FEM–C exited Store Three via the garden center as smoke can be seen on surveillance footage coming from both the home goods and the sporting goods sections. After exiting the Walmart, FEM–C walked back behind Store Three towards the dance school.

46. At 1:37 pm, MALE–A exited Store Three via the garden center, removed a pair of gloves, and walked back behind Store Three towards the dance school.

47. **MICHAEL BOTTORFF**’s van was near Store Three during the malicious fires.

Period Between the Third and Fourth Series of Malicious Fires

48. Between 7:12 and 7:29 pm, the Burner Phone connected with a cell tower in Biloxi, Mississippi located approximately 7.5 miles from the site of the upcoming malicious fire. During this period, **SEAN BOTTORFF** made two brief phone calls to **ALEXANDER OLSON**.

49. Between 7:44 and 8:30 pm, the Burner Phone connected with a different cell tower in Biloxi one mile closer to the fourth Walmart store where a malicious fire would soon be set.

50. While connected to this tower, the Burner Phone was used to visit multiple local news station websites in both Mobile, Alabama, and Gulfport, Mississippi — the locations of the first three sets of malicious fires.

Malicious Fire at Store Four— Biloxi, Mississippi

51. An hour after the Burner Phone was located very in the tower in Biloxi, Mississippi, a malicious fire was set at the Walmart located on Switzer Road (herein, “Store Four”).

52. Surveillance footage shows a heavily disguised male and female, identified herein as MALE-B and FEM-D, walking together towards Store Four on opposite sides of the road.

53. At 9:24 and 9:25 pm, respectively, FEM-D and MALE-B entered Store Four near the produce section.

54. Between 9:25 and 9:28 pm, the co-conspirators walked separately around Store Four with MALE-B appearing to trail FEM-D from a distance.

55. At 9:28 pm, FEM-D put on gloves and entered the home goods section. A vendor noticed FEM-D starting a fire in the home goods section of Store Four. The vendor began chasing FEM-D.

56. At 9:30 pm, FEM-D ran out an exit, then ran along the west side of Store Four, before running down Walmart Lane. Surveillance footage shows MALE-B ran down Walmart Lane a minute later.

57. **MICHAEL BOTTORFF**’s minivan was near Store Four during the time of the malicious fire.

58. At 9:38 and 9:39 pm, **SEAN BOTTORFF** called **ALEXANDER OLSON** twice. At the time of these calls, both of their phones connected with the cell tower nearest to Store Four.

59. At 9:43 pm, **MICHAEL BOTTORFF** called **QUINTON OLSON** for 7 seconds.

60. At 10:05 pm, **ALEXANDER OLSON** twice call **SEAN BOTTORFF**.

61. At 10:30 and 10:32 pm, respectively **ALEXANDER OLSON** attempted to call both **QUINTON OLSON** and **MICHAEL BOTTORFF**.

More News Agencies Contacted — Spanish Fort, Alabama

62. On June 11, 2021, one week after the third and fourth sets of malicious fires, the Burner Phone connected to free WIFI at a store in Spanish Fort, Alabama. At the same time the Burner Phone was connected to this WIFI, **QUINTON OLSON**'s personal cell phone was connected to the cell tower nearest that same store. While the Burner Phone was connected to the store's WIFI, the following events occurred:

63. Between 1:44 and 1:59 pm, the Burner Phone was used to make several internet searches for "*walmart fires*." It was then used to read multiple news stories about the attacks. In addition, the Burner Phone was used to find contact information for a specific foreign news outlet.

64. At 1:58 pm, **MICHAEL BOTTORFF** called **QUINTON OLSON**. While **QUINTON OLSON** and **MICHAEL BOTTORFF** were on this call, the Burner Phone was used to send an e-mail to the specific foreign news outlet mentioned above. The subject line of the e-mail read: "*We are the Veterans Order and we will not stop until change is made!*" The e-mail contained no message but attached were pictures of The Walmart Manifesto. **QUINTON OLSON** and **MICHAEL BOTTORFF** ended their call 14 seconds after this first e-mail was sent.

65. Between 2:02 and 2:30 pm, the Burner Phone was used to send numerous similar e-mails with pictures of The Walmart Manifesto to local, national, and international news agencies. Most e-mails contained no contents. However, e-mails to local news agencies in Biloxi and Jackson, Mississippi, respectively, contained the following messages: "*How many of these fires do we have to set for the news not to suppress this story and the evil caused by Walmart? We will not quit.*" and "*How long will the news continue to suppress this story and the reasons behind these fires? We will not stop.*"

Overt Acts

66. To carry out the manner and means of this conspiracy, the conspirators committed numerous overt acts, including, but not limited to the following:

- a. On or about May 27, 2021, **JEFFERY SIKES** set a malicious fire in Store One.
- b. On or about May 27, 2021, **ALEXANDER OLSON** set a malicious fire in Store One.
- c. On or about May 27, 2021, FEM-A set a malicious fire in Store One.
- d. On or about May 27, 2021, **MICHAEL BOTTORFF**'s minivan was in the vicinity of Store One at the time of the malicious fires.
- e. On or about May 28, 2021, FEM-B set a malicious fire in Store Two.
- f. On or about May 28, 2021, **MICHAEL BOTTORFF**'s minivan was in the vicinity of Store Two at the time of the malicious fire.
- g. On or about May 28, 2021, **ALEXANDER OLSON** purchased the Burner Phone used to take and send pictures of The Walmart Manifesto.
- h. On or about May 28, 2021, **MICHAEL BOTTORFF**'s minivan was present at the Daphne Walmart when the Burner Phone was purchased.
- i. On or about June 4, 2021, FEM-C set a malicious fire in Store Three.
- j. On or about June 4, 2021, **MICHAEL BOTTORFF**'s minivan was in the vicinity of Store Three at the time of the malicious fires.
- k. On or about June 4, 2021, FEM-D set a malicious fire in Store Four.
- l. On or about June 4, 2021, **MICHAEL BOTTORFF**'s minivan was in the vicinity of Store Four at the time of the malicious fire.
- m. On or about June 4, 2021, **SEAN BOTTORFF** called **ALEXANDER OLSON** in the near vicinity to the malicious fire in Store Four.
- n. On or about June 11, 2021, **QUINTON OLSON** sent an e-mail containing pictures of The Walmart Manifesto to a foreign news outlet.

All in violation of Title 18, United States Code, Section 844(n).

COUNT TWO
Malicious Destruction by Fire
Title 18, United States Code, Section 844(i)

67. The factual allegations set forth in paragraphs 11 through 20 of this indictment are re-alleged in Count Two as though fully set forth herein.

68. On or about May 27, 2021, in the Southern District of Alabama, the defendants,

JEFFERY SIKES, and
ALEXANDER OLSON

aided and abetted by each other, and by co-conspirator FEM-A, did maliciously damage and destroy, and attempt to maliciously damage and destroy, by means of fire, the Walmart store located at 101 East I-65 Service Road South in Mobile, Alabama 36606, and personal and real property, which is used in and affects interstate and foreign commerce, in violation of Title 18, United States Code, Section 844(i).

COUNT THREE
Malicious Destruction by Fire
Title 18, United States Code, Section 844(i)

69. The factual allegations set forth in paragraphs 21 through 29 of this indictment are re-alleged in Count Three as though fully set forth herein.

70. On or about May 28, 2021, in the Southern District of Alabama, the defendant,


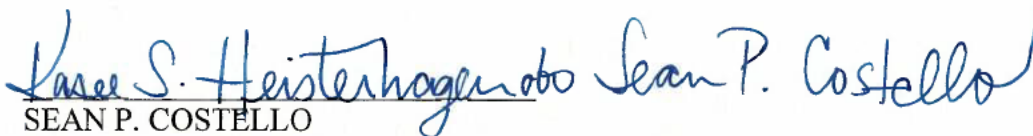
ALEXANDER OLSON,

aided and abetted co-conspirator FEM-B in maliciously damaging and destroying, and attempting to maliciously damage and destroy, by means of fire, the Walmart store located at 5245 Rangeline Service Road South in Mobile, Alabama 36619, and personal and real property, which is used in and affects interstate and foreign commerce, in violation of Title 18, United States Code, Section 844(i).

A TRUE BILL

FOREMAN, UNITED STATES GRAND JURY
SOUTHERN DISTRICT OF ALABAMA

SEAN P. COSTELLO
UNITED STATES ATTORNEY
By:


CHRISTOPHER J. BODNAR
Assistant United States Attorney
KASEE S. HEISTERHAGEN
Assistant United States Attorney
SEAN P. COSTELLO
Chief, Criminal Division

FEBRUARY 2022