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Court File No. 25023-Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

DANS LA COUR SUPREME DE LA COLOMBIE-BRITANNIQUE

CANADA
PROVINCE OF BRITISH COUMBIA/
PROVINCE DE LA COLOMBIE-BRITANNIQUE
CITY OF VANCOUVER/VILLE DE VANCOUVER

HER MAJESTY THE QUEEN / SA MAJESTE LA REINE

AGAINST / CONTRE

Daniel Ronald RUSSELL, Yong Sung John LEE, Dilun HENG, Barzan TILLI-CHOLI, Karwan Ahmet SAED, Conor D'MONTE, Cory VALLEE and Ion KROITORU, also known as John William CROITORU

INDICTMENT / ACTE D'ACCUSATION

Daniel Ronald RUSSELL, Yong Sung John LEE, Dilun HENG, Barzan TILLI-CHOLI, Karwan Ahmet SAED, Conor D'MONTE, Cory VALLEE and Ion KROITORU, also known as John William CROITORU stand charged that / sont inculpés de ce quit suit:

Count 1

Daniel Ronald RUSSELL, Yong Sung John LEE, Dilun HENG, Barzan TILLI-CHOLI, Karwan Ahmet SAED, Conor D'MONTE, Cory VALLEE and Ion KROITORU, also known as John William CROITORU, between the 1st day of January, 2008, and the 17th day of February, 2009, at or near Vancouver, Burnaby, Surrey and elsewhere in the Province of British Columbia, at or near Montreal, in the Province of Quebec, and elsewhere in Canada, did unlawfully conspire together, the one with the other, with Clay Franklin Roueche, Earl Ross, "Spaz" and with persons unknown, to commit the indictable offences of the

murders of Jonathan David Bacon, James Kyle Bacon, Jarrod Wayne Bacon and their associates, contrary to s.465(1)(a) of the Criminal Code of Canada.

Count 2

Daniel Ronald RUSSELL, Yong Sung John LEE, Dilun HENG, Barzan TILLI-CHOLI, Karwan Ahmet SAED, Cory VALLEE and Ion KROITORU, also known as John William CROITORU, on or about the 9th day of May, 2008, at or near Burnaby, in the Province of British Columbia, did commit the first degree murder of Jonathan Barber, contrary to s. 235 of the Criminal Code of Canada.

Count 3

Daniel Ronald RUSSELL, Yong Sung John LEE, Dilun HENG, Barzan TILLI-CHOLI, Karwan Ahmet SAED, Cory VALLEE and Ion KROITORU, also known as John William CROITORU, on or about the 9th day of May, 2008, at or near Burnaby, in the Province of British Columbia, did, using a firearm, attempt to commit the murder of Vicki King, contrary to s. 239(1)(a.1) of the Criminal Code.

Count 4

Cory VALLEE and Conor D'MONTE, on or about the 6th of February, 2009, at or near Langley, in the Province of British Columbia, did commit the first degree murder of Kevin Leclair, contrary to s. 235 of the Criminal Code of Canada.

Count 5

Barzan TILLI-CHOLI, on or about the 16th day of February, 2009, at or near Surrey, in the Province of British Columbia, did, using a firearm, attempt to commit the murder of Fraser Sutherland, contrary to s.239(1)(a.1) of the Criminal Code of Canada.

Count 6

Barzan TILLI-CHOLI, on or about the 16th day of February, 2009, at or near Surrey, in the Province of British Columbia, did, using a firearm, attempt to commit the murder of Tyler Willock, contrary to s.239(1)(a.1) of the Criminal Code of Canada.

DATED this/FAIT le ____ day of January/jour de janvier, 2011 at the City of Vancouver/dans la Ville de Vancouver, Province of British Columbia/province de la Colombie-Britannique.

Crown Counsel and Agent of the Attorney General of British Columbia/ Avocat de la Couronne et Substitut du Procureur général pour la province de la Colombie-Britannique.