

U.S. DISTRICT COURT
DISTRICT OF MAINE
PORTLAND
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UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

MAR 20 2024

CHRISTA K. BERRY, CLERK

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UNITED STATES OF AMERICA

v.

WINSTON MCLEOD
LANCE FUNDERBURK

No. 2:24-cr-00035-NT

INDICTMENT

The Grand Jury charges:

**COUNT ONE
(Conspiracy to Rob U.S. Postal Carriers, and
to Burgle U.S. Post Offices)**

THE CONSPIRACY AND ITS OBJECTS

1. Beginning on about January 14, 2024, and continuing until at least about January 21, 2024, in the District of Maine and elsewhere, the defendants,

**WINSTON MCLEOD and
LANCE FUNDERBURK,**

knowingly and intentionally conspired with each other and with others known and unknown to commit offenses against the United States, specifically, (1) the assaults of Carrier-1 and Carrier-2, persons having lawful charge, custody, and control of United States mail matter, money, and other property of the United States, with intent to rob, steal, and purloin said mail matter, money and other property of the United States, and in so doing, the defendants put the life of Carrier-1 and Carrier-2 in jeopardy by the use of a dangerous weapon, that is a knife, in violation of Title 18, United States Code, Section 2114(a), and (2) the forcible break-in of the post offices located in Paris, Maine, and North Monmouth, Maine, with the intent to commit larcenies in such post offices, in violation of Title 18, United States Code, Section 2115.

In this way, the defendants violated Title 18, United States Code, Section 371.

MANNER AND MEANS OF THE CONSPIRACY

2. It was a part and object of the conspiracy that the defendants intended to, and did, threaten to kill postal carriers using a knife in order to obtain postal keys from the postal carriers.

3. It was a part and object of the conspiracy that the defendants intended to, and did, forcibly enter post offices in Paris and North Monmouth, Maine in order to steal, among other things, money order printers, mail, computers, and post office box keys.

OVERT ACTS

4. On about January 14, 2024, the defendants traveled to the Paris post office located at 39 Tremont Street, broke a window, forcibly entered the post office, and stole postal equipment and mail.

5. On about January 16, 2024, the defendants traveled to the North Monmouth post office located at 140 N. Main Street, broke a window, forcibly entered the post office, and stole postal equipment and mail.

6. On about January 20, 2024, the defendants traveled to 20 Davis Street in Lewiston, and, while wearing ski masks and armed with knives, threatened to kill Carrier-1 unless Carrier-1 handed over her postal key.

7. On about January 20, 2024, the defendants traveled to 480 Main Street in Lewiston, and, while wearing ski masks and armed with knives, threatened to kill Carrier-2 unless Carrier-2 handed over his postal key.

**COUNT TWO
(Burglary of a U.S. Post Office)**

8. On about January 14, 2024, in the District of Maine, the defendants,

**WINSTON MCLEOD and
LANCE FUNDERBURK,**

did forcibly break into, and attempted to break into, the Paris post office, located at 39 Tremont Street, with the intent to commit a larceny in such post office.

In this way, the defendants violated Title 18, United States Code, Section 2115 and 2.

**COUNT THREE
(Burglary of a U.S. Post Office)**

9. On about January 16, 2024, in the District of Maine, the defendants,

**WINSTON MCLEOD and
LANCE FUNDERBURK,**

did forcibly break into, and attempted to break into, the North Monmouth post office, located at 140 N. Main Street, with the intent to commit a larceny in such post office.

In this way, the defendants violated Title 18, United States Code, Section 2115 and 2.

**COUNT FOUR
(Robbery of a U.S. Postal Carrier)**

10. On about January 20, 2024, in the District of Maine, the defendants,

**WINSTON MCLEOD and
LANCE FUNDERBURK,**

did assault Carrier-1, a person having lawful charge, custody, and control of United States mail matter, money, and other property of the United States, with intent to rob, steal, and purloin said mail matter, money and other property of the United States, and in doing so the defendants put the life of Carrier-1 in jeopardy by the use of a dangerous

weapon, that is a knife.

In this way, the defendants violated Title 18, United States Code, Section 2114(a) and 2.

**COUNT FIVE
(Robbery of a U.S. Postal Carrier)**

11. On about January 20, 2024, in the District of Maine, the defendants,

**WINSTON MCLEOD and
LANCE FUNDERBURK,**

did assault Carrier-2, a person having lawful charge, custody, and control of United States mail matter, money, and other property of the United States, with intent to rob, steal, and purloin said mail matter, money and other property of the United States, and in doing so the defendants put the life of Carrier-2 in jeopardy by the use of a dangerous weapon, that is a knife.

In this way, the defendants violated Title 18, United States Code, Section 2114(a) and 2.

FORFEITURE NOTICE

12. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Sections 371 and 2114(a), set forth in Count One of this Indictment or in violation of Title 18, United States Code, Section 2114(a), set forth in Counts Four and Five of this Indictment, the defendants,

**WINSTON MCLEOD and
LANCE FUNDERBURK**

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to said violation. The

property to be forfeited includes, but is not limited to, a money judgment in the amount of all such proceeds.

13. If any of the property described in Paragraph 17, above, as being forfeitable pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendants—

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property described in paragraph 12 above.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

Signature Redacted – Original on file
with the Clerk's Office


Assistant United States Attorney

Date: MARCH 22, 2024