

ORIGINAL

CLERK US DISTRICT COURT  
NORTHERN DIST. OF TX  
FILED

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

2016 AUG -2 PM 3:51

DEPUTY CLERK K

UNITED STATES OF AMERICA

v.

JOSHUA PUCKETT (1)  
TYLER WOODARD (2)

NO. 3:16-CR-067-K

**Supersedes Indictment**  
**Filed on: February 18, 2016**

The Grand Jury Charges:

Count One  
Conspiracy to Commit Carjacking  
(Violation of 18 U.S.C. § 371)

Beginning on or about November 2, 2015, and continuing until on or about December 9, 2015, the exact dates being unknown, in the Dallas Division of the Northern District of Texas, and elsewhere, the defendants, **Joshua Puckett** and **Tyler Woodard**, did knowingly, intentionally and unlawfully combine, conspire, confederate, and agree together, with other persons both known and unknown to the Grand Jury, to commit a certain offense against the United States, to-wit: carjacking, in violation of 18 U.S.C. § 2119.

OBJECTS OF THE CONSPIRACY

The object of the conspiracy was to, with intent to cause death and serious bodily harm, take motor vehicles that had been transported, shipped, and received in interstate and foreign commerce, as referenced below, from the person or presence of another by

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force and violence, and by intimidation.

MANNER AND MEANS

1. It was part of the conspiracy that the defendants, **Puckett** and **Woodard**, and others known and unknown to the Grand Jury, formulated a plan and agreement which, among other things, included the carjacking of the following motor vehicles:

Vehicle	Vehicle Identification Number (VIN)	License Plate Number
2003 Lexus IS300	JTHBD192530073892	67T3685 (Texas)
2013 BMW M3	WBSKG9C55DJ595288	75J7302 (Texas)
2011 BMW M3	WBSKG9C56BE368939	FGV1222 (Texas)
2014 Audi A4	WAUAF AFL6EN042559	DMK3392 (Texas)
2013 Toyota Rav 4	2T3YFREVODW007316	BTW8075 (Texas)
2011 BMW 335i	WBAKG1C56BE618377	SWERVV (Texas)
2010 Toyota Highlander	5TDKK3EH4AS007938	No license plate

At all times during the course and scope of the conspiracy, the above-referenced vehicles had been transported, shipped, and received in interstate and foreign commerce, and taken from the person or presence of another by force and violence, and by intimidation, or there was an attempt by the defendants to do so, as contemplated in 18 U.S.C. § 2119.

2. It was further part of the conspiracy, that **Puckett**, **Woodard**, and others known and unknown to the Grand Jury, formulated a plan and agreement which, among other things, included:

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- a. the selection of the motor vehicle to be carjacked;
- b. the time and location of the carjacking;
- c. the role each co-conspirator would play in the carjacking;
- d. the use of a dangerous weapon in committing the carjacking;
- e. the use of force and violence, and intimidation, against the victim in committing the carjacking; and
- f. attempts to avoid detection and apprehension by law enforcement.

OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

To effect the object of the conspiracy, **Puckett, Woodard**, and others known and unknown to the Grand Jury, committed overt acts within the Northern District of Texas, and elsewhere, including, but not limited to, the following:

1. On or about November 2, 2015, in the Northern District of Texas, **Puckett** and **Woodard** drove together to commit the offense of carjacking.
2. On or about November 2, 2015, in the Northern District of Texas, **Puckett** and **Woodard**, with intent to cause death and serious bodily harm, did knowingly and unlawfully take a motor vehicle, to wit: a 2003 Lexus IS300, bearing vehicle identification number (VIN) JTHBD192530073892 and Texas license plate number 67T3685, that had been transported, shipped, and received in interstate and foreign commerce, from the person or presence of D.T. by force and violence, and by intimidation, by approaching D.T., and **Puckett** pointing a gun at D.T.
3. On or about November 2, 2015, after committing the carjacking referenced in the

preceding two paragraphs, **Woodard** drove away in D.T.'s vehicle and **Puckett** returned to the vehicle they were both originally in and drove away.

4. On or about November 10, 2015, in the Northern District of Texas, **Puckett** approached S.W. and asked him for a ride.

5. On or about November 10, 2015, in the Northern District of Texas, after S.W. took **Puckett** to an ATM, **Puckett**, with intent to cause death and serious bodily harm, did knowingly and unlawfully take a motor vehicle, to wit: a 2013 BMW M3, bearing vehicle identification number (VIN) WBSKG9C55DJ595288 and Texas temporary license plate number 75J7302, that had been transported, shipped, and received in interstate and foreign commerce, from S.W. by force and violence, and by intimidation, by pistol-whipping S.W. and choking him.

6. On or about December 5, 2015, in the Eastern District of Texas, **Puckett** and others unknown to the Grand Jury, struck the back of the motor vehicle driven by J.C.R. with a motor vehicle.

7. On or about December 5, 2015, in the Eastern District of Texas, **Puckett** and others unknown to the Grand Jury, with intent to cause death and serious bodily harm, did knowingly and unlawfully take a motor vehicle, to wit: a 2011 BMW M3, bearing vehicle identification number (VIN) WBSKG9C56BE368939 and Texas license plate number FGV1222, that had been transported, shipped, and received in interstate and foreign commerce, from J.C.R. by force and violence, and by intimidation, by pointing a pistol at J.C.R. and shooting him.

8. On or about December 5, 2015, **Puckett** drove away in the BMW M3, described in the preceding paragraph, and others unknown to the Grand Jury followed **Puckett** driving the vehicle **Puckett** was originally in.

9. On or about December 7, 2015, in the Southern District of Texas, **Puckett**, with intent to cause death and serious bodily harm, did knowingly and unlawfully attempt to take a motor vehicle, to wit: a 2014 Audi A4, bearing vehicle identification number (VIN) WAUAF AFL6EN042559 and Texas license plate number DMK3392, that had been transported, shipped, and received in interstate and foreign commerce, from H.C. by force and violence, and by intimidation, by pointing a pistol at H.C. while he was sitting in his vehicle and demanding the keys from H.C.

10. On or about December 7, 2015, in the Southern District of Texas, after H.C. told **Puckett** he did not have the keys as described in the preceding paragraph, **Puckett** left.

11. On or about December 7, 2015, in the Southern District of Texas, in a parking lot at the same facility as the preceding two paragraphs, **Puckett**, with intent to cause death and serious bodily harm, did knowingly and unlawfully take a motor vehicle, to wit: a 2013 Toyota Rav 4, bearing vehicle identification number, (VIN) 2T3YFREVODW007316 and Texas license plate number BTW8075, that had been transported, shipped, and received in interstate and foreign commerce, from S.G. by force and violence, and by intimidation, by pointing a pistol at S.G. and striking her with the pistol.

12. On or about December 7, 2015, in the Eastern District of Texas, **Puckett**, and others unknown to the Grand Jury, approached the driver's door of a motor vehicle in which Z.M. was sitting behind the steering wheel.

13. On or about December 7, 2015, in the Eastern District of Texas, **Puckett**, with intent to cause death and serious bodily harm, did knowingly and unlawfully attempt to take a motor vehicle, to wit: a 2011 BMW 335i, bearing vehicle identification number (VIN) WBAKG1C56BE618377 and Texas license plate number SWERVV, that had been transported, shipped, and received in interstate and foreign commerce, from Z.M. by force and violence, and by intimidation, by pointing a pistol at Z.M. and shooting him.

14. On or about December 7, 2015, in the Eastern District of Texas, after attempting to carjack Z.M. as described in the preceding paragraph, **Puckett** returned to the vehicle he was driving, a small SUV, and followed Z.M. for a brief period of time after Z.M. drove away to escape harm.

15. On or about December 9, 2015, in the Northern District of Texas, officers from the Dallas Police Department observed **Puckett** driving a motor vehicle, to wit: the 2013 Toyota Rav 4 that he carjacked from S.G. described in paragraph 11, in a motel parking lot. In an attempt to avoid apprehension, **Puckett** evaded the police in the Toyota Rav 4 and on foot. **Puckett** eventually ran into the Toyota of Dallas dealership.

16. On or about December 9, 2015, in the Northern District of Texas, **Puckett**, with

intent to cause death and serious bodily harm, did knowingly and unlawfully take a motor vehicle, to wit: a 2010 Toyota Highlander, bearing vehicle identification number (VIN) 5TDKK3EH4AS007938, that had been transported, shipped, and received in interstate and foreign commerce, from M.A. by force and violence, and by intimidation, by pointing a pistol at M.A. as he was attempting to stop **Puckett** from taking this vehicle.

17. On or about December 9, 2015, in the Northern District of Texas, **Puckett** evaded the police driving a motor vehicle, to wit: the Toyota Highlander described in the preceding paragraph, that he had carjacked from M.A.

18. On or about December 9, 2015, in the Northern District of Texas, **Puckett** continued to evade the police on foot after carjacking the Toyota Highlander, described in paragraph 16, and he dropped the pistol just before the police apprehended him.

All in violation of 18 U.S.C. § 371.

Count Two

Using, Carrying, and Brandishing a Firearm  
During and in Relation to a Crime of Violence  
(Violation of 18 U.S.C. § 924(c)(1)(A)(iii))

On or about December 5, 2015, in the Northern District of Texas, and elsewhere, the defendant, **Joshua Puckett**, did knowingly use, carry, brandish and discharge a firearm during and in relation to a crime of violence, namely conspiracy to commit carjacking, in violation of 18 U.S.C. § 371, as alleged in Count One of this Indictment, for which the defendant may be prosecuted in a court of the United States.

In violation of 18 U.S.C. § 924(c)(1)(A)(iii).



Count Three  
Carjacking  
(Violation of 18 U.S.C. §§ 2119 and 2)

On or about November 2, 2015, in the Dallas Division of the Northern District of Texas, the defendants, **Joshua Puckett** and **Tyler Woodard**, aiding and abetting one another, and with intent to cause death and serious bodily harm, did knowingly and unlawfully take a motor vehicle, to wit: a 2003 Lexus IS300, bearing vehicle identification number (VIN) JTHBD192530073892 and Texas license plate number 67T3685, that had been transported, shipped, and received in interstate and foreign commerce, from the person and presence of another by force and violence, and by intimidation.

In violation of 18 U.S.C. §§ 2119 and 2.

Count Four  
Carjacking  
(Violation of 18 U.S.C. § 2119)

On or about November 10, 2015, in the Dallas Division of the Northern District of Texas, the defendant, **Joshua Puckett**, with intent to cause death and serious bodily harm, did knowingly and unlawfully take a motor vehicle, to-wit: a 2013 BMW M3, bearing vehicle identification number (VIN) WBSKG9C55DJ595288 and Texas temporary license plate number 75J7302, that had been transported, shipped, and received in interstate and foreign commerce, from the person and presence of another by force and violence, and by intimidation.

In violation of 18 U.S.C. § 2119.

Count Five  
Carjacking  
(Violation of 18 U.S.C. § 2119)

On or about December 9, 2015, in the Dallas Division of the Northern District of Texas, the defendant, **Joshua Puckett**, with intent to cause death and serious bodily harm, did knowingly and unlawfully take a motor vehicle, to-wit: a 2010 Toyota Highlander, bearing vehicle identification number (VIN) 5TDKK3EH4AS007938, that had been transported, shipped, and received in interstate and foreign commerce, from the person and presence of another by force and violence, and by intimidation.

In violation of 18 U.S.C. § 2119.

Count Six

Using, Carrying, and Brandishing a Firearm  
During and in Relation to a Crime of Violence  
(Violation of 18 U.S.C. § 924(c)(1)(C)(i))

On or about December 9, 2015, in the Dallas Division of the Northern District of Texas, the defendant, **Joshua Puckett**, did knowingly use, carry and brandish a firearm, to-wit: a Glock, model 26, 9 millimeter pistol, bearing serial number MGA769, during and in relation to a crime of violence, namely, carjacking, in violation of 18 U.S.C. § 2119, as alleged in Count Five of this Indictment, for which the defendant may be prosecuted in a court of the United States.

In violation of 18 U.S.C. § 924(c)(1)(C)(i).

A TRUE BILL

  
FOREPERSON

JOHN R. PARKER  
UNITED STATES ATTORNEY

  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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THE UNITED STATES OF AMERICA

v.

JOSHUA PUCKETT (1)  
TYLER WOODARD (2)

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SUPERSEDING INDICTMENT

18 U.S.C. § 371  
Conspiracy to Commit Carjacking

18 U.S.C. § 924(c)(1)(A)(iii)  
Using, Carrying, and Brandishing a Firearm  
During and in Relation to a Crime of Violence

18 U.S.C. §§ 2119 and 2  
Carjacking

18 U.S.C. § 2119  
Carjacking

18 U.S.C. § 924(c)(1)(C)(i)  
Using, Carrying, and Brandishing a Firearm  
During and in Relation to a Crime of Violence

6 Counts

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A true bill rendered

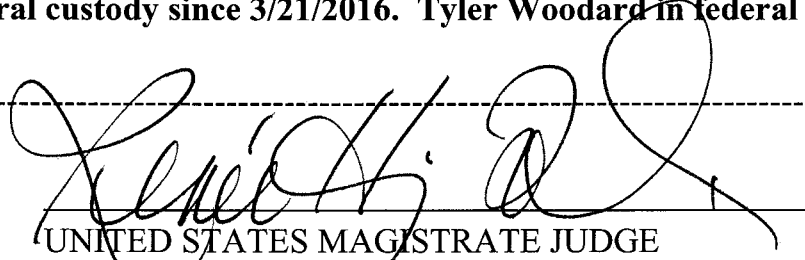
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DALLAS

  
FOREPERSON

Filed in open court this 2nd day of August, 2016.

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**Joshua Puckett in federal custody since 3/21/2016. Tyler Woodard in federal custody since 3/9/2016.**  
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UNITED STATES MAGISTRATE JUDGE  
Criminal Case Pending: 3:16-CR-067-K