

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

FILED  
CHARLOTTE, NC

NOV 24 2025

UNITED STATES OF AMERICA )  
)  
)  
)  
)  
v. )  
)  
)  
)  
WILLIAM STANLEY and )  
HEATHER MORROW )  
)  
)  
\_\_\_\_\_ )

CASE NO. **3:25mj-320-DCK** US DISTRICT COURT  
WESTERN DISTRICT OF NC

**BILL OF INFORMATION**

Violations: 18 U.S.C. § 111(a)(1)  
18 U.S.C. § 2  
40 U.S.C. § 1315  
41 C.F.R. § 102-74.365  
41 C.F.R. § 102-74.385  
41 C.F.R. § 102-74.390  
41 C.F.R. § 102-74.450

**THE UNITED STATES ATTORNEY CHARGES:**

**COUNT ONE**  
**(OBSTRUCTING THE USE OF ENTRANCES ON FEDERAL PROPERTY)**

On or about November 16, 2025, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, the defendants,

**WILLIAM STANLEY and  
HEATHER MORROW**

aiding and abetting one another, did willfully enter in and on Federal property, that is, the grounds of the Immigration and Customs Enforcement/Enforcement and Removal Operations building, located at 6130 Tyvola Centre Drive, Charlotte, North Carolina 28217, and exhibit disorderly conduct and other conduct that unreasonably obstructed the usual use of the building's entrances and parking lots.

All in violation of 40 U.S.C. § 1315, 41 C.F.R. § 102-74.365, 41 C.F.R. § 102-74.390(b), 41 C.F.R. § 102-74.450, and 18 U.S.C. § 2.

**COUNT TWO**  
**(IMPEDING AND DISRUPTING PERFORMANCE OF OFFICIAL DUTIES OF  
GOVERNMENT EMPLOYEES)**

On or about November 16, 2025, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, the defendants,

**WILLIAM STANLEY and  
HEATHER MORROW**

aiding and abetting one another, did willfully enter in and on Federal property, that is, the grounds of the Immigration and Customs Enforcement/Enforcement and Removal Operations (ERO) building, located at 6130 Tyvola Centre Drive, Charlotte, North Carolina 28217, and exhibit disorderly conduct and other conduct that impeded and disrupted the performance of official duties by Government employees, to wit ERO Deportation Officers.

All in violation of 40 U.S.C. § 1315, 41 C.F.R. § 102-74.365, 41 C.F.R. § 102-74.390(c), 41 C.F.R. § 102-74.450, and 18 U.S.C. § 2.

**COUNT THREE**  
**(FAILURE TO COMPLY WITH LAWFUL DIRECTION OF AUTHORIZED INDIVIDUAL)**

On or about November 16, 2025, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, the defendants,

**WILLIAM STANLEY and  
HEATHER MORROW**

aiding and abetting one another, did willfully enter in and on Federal property, that is, the grounds of the Immigration and Customs Enforcement/Enforcement and Removal Operations (ERO) building, located at 6130 Tyvola Centre Drive, Charlotte, North Carolina 28217, and fail to comply with the lawful direction of one or more authorized individuals, to wit ERO Deportation Officers.

All in violation of 40 U.S.C. § 1315, 41 C.F.R. § 102-74.365, 41 C.F.R. § 102-74.385, 41 C.F.R. § 102-74.450, and 18 U.S.C. § 2.

**COUNT FOUR**  
**(ASSAULTING, RESISTING, OPPOSING, IMPEDING, INTIMIDATING, AND  
INTERFERING WITH PERSONS PERFORMING OFFICIAL DUTIES)**

On or about November 16, 2025, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, the defendants,

**WILLIAM STANLEY and  
HEATHER MORROW**

aiding and abetting one another, did forcibly assault, resist, oppose, impede, intimidate, and interfere with federal officers or employees (as described in 18 U.S.C. § 1114), to wit Enforcement and Removal Operations Deportation Officers, who were engaged in or on account of the performance of official duties, such acts constituting only simple assault.

In violation of 18 U.S.C. § 111(a)(1) and 18 U.S.C. § 2.

RUSS FERGUSON  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
KENNETH M. SMITH  
ASSISTANT UNITED STATES ATTORNEY