IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLORADO

Criminal Case No.

UNITED STATES OF AMERICA,

Plaintiff,

v.

 EARL ALBERT MOORE, a/k/a John Linzy, a/k/a John Lindzy, a/k/a Earl Buchanan, a/k/a Earl Buchannan, a/k/a Morelli Buchanon, a/k/a Donald Morelli, a/k/a Gary Steele, a/k/a Glenn Quickner,

Defendant.

INDICTMENT

18 U.S.C. § 844(i) Arson of Building and Other Real Property in Interstate Commerce 18 U.S.C. § 924(c) and 18 U.S.C. § 921(a)(3) and (4) Use of a Destructive Device During and in Relation to a Crime of Violence

The Grand Jury charges:

COUNT 1

On or about April 20, 2011, in the State and District of Colorado, the defendant, EARL

ALBERT MOORE, a/k/a John Linzy, a/k/a John Lindzy, a/k/a Earl Buchanan, a/k/a Earl

Buchannan, a/k/a Morelli Buchanon, a/k/a Donald Morelli, a/k/a Gary Steele, a/k/a Glenn

Quickner, did maliciously damage and destroy, and attempt to damage and destroy, by means of

fire and an explosive, a building and other real and personal property used in interstate or foreign

commerce and used in any activity affecting interstate or foreign commerce.

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

COUNT 2

The Grand Jury further charges that:

On or about April 20, 2011, in the State and District of Colorado, the defendant, EARL ALBERT MOORE, a/k/a John Linzy, a/k/a John Lindzy, a/k/a Earl Buchanan, a/k/a Earl Buchannan, a/k/a Morelli Buchanon, a/k/a Donald Morelli, a/k/a Gary Steele, a/k/a Glenn Quickner, during and in relation to a crime of violence, and in furtherance of that crime, namely: use of fire and explosive to damage and destroy and attempt to damage and destroy a building and other real and personal property in interstate commerce, in violation of Title 18, United States Code, Section 844(i), as charged in Count 1, did knowingly use and carry, and possess, a destructive device, to wit: an improvised explosive device ("IED"), also known as a homemade bomb.

All in violation of Title 18, United States Code, Section 924(c) and Title 18, United States Code, Sections 921(a)(3) and (4).

TRUE BILL

Ink signature on file in the clerk's office FOREPERSON

JOHN F. WALSH United States Attorney

By: <u>s/ Gregory Holloway</u> GREGORY HOLLOWAY, WSBA #28743 Assistant United States Attorney United States Attorney's Office 1225 Seventeenth Street, Suite 700 Denver, Colorado 80202 Telephone: (303) 454-0122 Facsimile: (303) 454-0406 Email: Gregory.Holloway@usdoj.gov Attorney for the United States

INFORMATION SHEET

<u>DEFENDANT</u>	EARL ALBERT MOORE, a/k/a John Linzy, a/k/a John Lindzy, a/k/a Earl Buchanan, a/k/a Earl Buchannan, a/k/a Morelli Buchanon, a/k/a Donald Morelli, a/k/a Gary Steele, a/k/a Glenn Quickner,
YEAR OF BIRTH:	1946
ADDRESS:	In Custody
COMPLAINT FILED?	<u>X</u> YES NO
IF YES, PROVIDE	MAGISTRATE CASE NUMBER: <u>1:11-mj-01062-MJW</u>
HAS DEFENDANT BEEN	ARRESTED ON COMPLAINT? YES
<u>OFFENSE</u> :	<u>Count 1</u> : 18 U.S.C. § 844(i): Arson of Building and Other Real Property in Interstate Commerce
	<u>Count 2</u> : 18 U.S.C. § 924(c) and 18 U.S.C. § 921(a)(3) and (4): Use of a Destructive Device During and in Relation to a Crime of Violence

LOCATION OF OFFENSE: Jefferson County, Colorado.

PENALTY:Count 1: NLT 5 years imprisonment, NMT 20 years
imprisonment; \$250,000 fine, or both; NMT 5 years supervised
release; \$100.00 Special Assessment Fee; and restitutionCount 2: NLT 30 years imprisonment, NMT life imprisonment
(consecutive to any other sentence imposed); \$250,000 fine, or
both; NMT 5 years supervised release; \$100 Special Assessment
Fee; and restitutionAGENTS:Special Agent Larry Kreger, Jr. – FBI
Special Agent Rebecca Sauerhaft – ATF
Investigator David Swavely – JCSO
Investigator Don Roach – JCSO

<u>AUTHORIZED BY</u>: Gregory Holloway, Assistant United States Attorney

ESTIMATED TIME OF TRIAL:

X five days or less over five days other

THE GOVERNMENT

X will seek detention in this case will **not** seek detention in this case

The statutory presumption of detention is applicable to this defendant.

OCDETF CASE: Yes X No