

clerk of the court for the Eastern District of Pennsylvania, who was responsible for reviewing mail directed to officials in the Eastern District of Pennsylvania, including United States judges.

3. From on or about August 9, 2011 to on or about August 11, 2011, in the Eastern and Middle Districts of Pennsylvania, and elsewhere, defendant

WILLIAM BROWN

knowingly caused to be delivered by the United States Postal Service according to the directions thereon a written communication addressed to P.T., a United States Judge in the Eastern District of Pennsylvania. The written communication contained a threat to injure and kill the United States Judge.

In violation of Title 18, United States Code, Section 876(c) and Title 18, United States Code, Section 2.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 of Count One of this Indictment are hereby incorporated and realleged as if fully set forth herein.

2. From on or about August 9, 2011 to on or about August 11, 2011, in the Eastern and Middle Districts of Pennsylvania, and elsewhere, defendant

WILLIAM BROWN

did knowingly and willfully threaten to assault and murder P.T., a United States Judge, with intent to impede, intimidate, and interfere with such judge while engaged in the performance of official duties, and with intent to retaliate against such judge on account of the performance of official duties.

In violation of Title 18, United States Code, Section 115(a)(1)(B) and Title 18, United States Code, Section 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about August 9, 2011, at Camp Hill, in the Middle District of Pennsylvania, defendant WILLIAM BROWN mailed and caused to be mailed a letter containing threats to D.V., a retired United States Judge in the Eastern District of Pennsylvania. These threats included but were not limited to the following:

You took my old Head life [expletive] you All Yall [sic] do is send
n... [racial epithet] to jail. All we try to do is support out kids
When I get out you a Dead Man Mr. [name]
Eat [illegible] die [illegible] die

The letter was unsigned and contained a smearing of fecal matter along with the words “Scratch and Sniff [expletive]” at the bottom. The return sender section of the mailing envelope listed William Brown’s name and Inmate Number and the prison mailing address for S.C.I. Camp Hill.

2. On or about August 11, 2011, the letter was received at the federal courthouse in Philadelphia, in the Eastern District of Pennsylvania. The letter was reviewed and examined by a clerk of the court for the Eastern District of Pennsylvania, who was responsible for reviewing mail directed to officials in the Eastern District of Pennsylvania, including United States judges.

3. From on or about August 9, 2011 to on or about August 11, 2011, in the Eastern and Middle Districts of Pennsylvania, and elsewhere, defendant

WILLIAM BROWN

knowingly caused to be delivered by the United States Postal Service according to the directions thereon a written communication addressed to D.V., a retired United States Judge in the Eastern

District of Pennsylvania. The written communication contained a threat to injure and kill the retired United States Judge.

In violation of Title 18, United States Code, Section 876(c) and Title 18, United States Code, Section 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 of Count Three of this Indictment are hereby incorporated and realleged as if fully set forth herein.

2. From on or about August 9, 2011 to on or about August 11, 2011, in the Eastern and Middle Districts of Pennsylvania, and elsewhere, defendant

WILLIAM BROWN

did knowingly and willfully threaten to assault and murder D.V., a retired United States Judge, with intent to impede, intimidate, and interfere with such judge while engaged in the performance of official duties, and with intent to retaliate against such judge on account of the performance of official duties.

In violation of Title 18, United States Code, Section 115(a)(1)(B) and Title 18, United States Code, Section 2.

A TRUE BILL:

GRAND JURY FOREPERSON



ERIC H. HOLDER, JR.
UNITED STATES ATTORNEY GENERAL

PAUL J. FISHMAN
UNITED STATES ATTORNEY
DISTRICT OF NEW JERSEY