
United States District Court
District of New Jersey

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**

v. :

JAKE J. BRAHM : **Magistrate No. 06-8223 (MCA)**

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

From in or about September 2006 to on or about October 18, 2006, in the District of New Jersey, and elsewhere, defendant knowingly and willfully engaged in conduct with intent to convey false or misleading information under circumstances where such information may reasonably have been believed and where such information indicated that activity would take place that would constitute a violation of Chapter 40 of Title 18, United States Code (malicious damage of any building or vehicle in violation of 18 U.S.C. § 844(I)) and Chapter 113B of Title 18, United States Code (use of weapons of mass destruction against persons or property within the United States, in violation of 18 U.S.C. § 2332a(a)(1)(D), and use of radiological dispersal devices designed and intended to release radiation or radioactivity at a level dangerous to human life, in violation of 18 U.S.C. § 2332h(a)(1)(A)).

All in violation of Title 18, United States Code, Section 1038(a).

I further state that I am a Special Agent of the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT A

Steven A. Kimball
Special Agent, Federal Bureau of Investigation

Sworn to and subscribed in my presence,

October 19, 2006 at _____
Date City and State

Hon. Madeline Cox Arleo
United States Magistrate Judge
Name and Title of Judicial Officer

Signature of Judicial Officer

ATTACHMENT A

I, Steven A. Kimball, a Special Agent of the Federal Bureau of Investigation, assigned to the Newark Field Office, having conducted an investigation, and having discussed this matter with other law-enforcement agents and reviewed documents and reports, have knowledge of the facts set forth below. All statements which I have attributed to others have been set forth in substance and in part.

1. In or about September 2006, defendant JAKE J. BRAHM posted on an Internet website, www.4chan.org, a public message that threatened the detonation of explosive devices at seven stadiums hosting National Football League games on Sunday, October 22, 2006. The reference to "New York City" connoted Giants Stadium in East Rutherford, New Jersey, which is the home of the New York Giants and the New York Jets, and which was scheduled to host a New York Jets home game on October 22, 2006. Additionally, the message threatened that the bombs would cause radiological fallout resulting in numerous fatalities. The message stated, in substance and in part:

On Sunday, October 22nd, 2006, there will be seven "dirty" explosive devices detonated in seven different U.S. cities; Miami, New York City, Atlanta, Seattle, Houston, Oakland and Cleveland. The death toll will approach 100,000 from the initial blasts and countless other fatalities will later occur as result from radioactive fallout.

The bombs themselves will be delivered via trucks. These trucks will pull up to stadiums hosting NFL games in each respective city. All stadiums to be targeted are open air arenas, excluding Atlanta's Georgia Dome, the only enclosed stadium to be hit. Due to the open air, the radiological fallout will destroy those not killed in the initial explosion. The explosions will be near simultaneous, with the cities specifically chosen in different time zones to allow for multiple attacks at the same time.

The 22nd of October will mark the final day of Ramadan as it would fall in Mecca. Al-Qaida will automatically be blamed for the attacks. Later, through Al-Jazeera, Osama bin Laden will issue a video message claiming responsibility for what he dubs "America's Hiroshima".

In the aftermath civil wars will erupt across the world, both in the Middle East and within the United States. Global economies will screech to a halt. General chaos will rule.

2. During an interview on October 18, 2006, during which defendant JAKE J. BRAHM was read his rights pursuant to *Miranda v. Arizona*, 386 U.S. 436 (1966), he admitted to posting the above-described message in the “random” posting section of www.4chan.org. Defendant JAKE J. BRAHM further admitted that before posting the message, he researched which National Football League teams were playing on October 22, 2006, and listed the cities to connote those stadiums hosting the games.

3. My investigation has determined that the www.4chan.org website and the “random” posting section of that website were available to all Internet users, and accordingly the above-described messages were communications in and affecting interstate commerce.

4. During the October 18, 2006, interview, defendant JAKE J. BRAHM also admitted that between September 2006 and October 18, 2006, he re-posted the above-described message, in whole or in part, approximately forty times on www.4chan.org. My investigation has determined that others subsequently re-posted the message, in whole or in part, on websites throughout the Internet.

5. During the October 18, 2006, interview, defendant JAKE J. BRAHM admitted that he knew the above-described message was false when he authored and posted it.