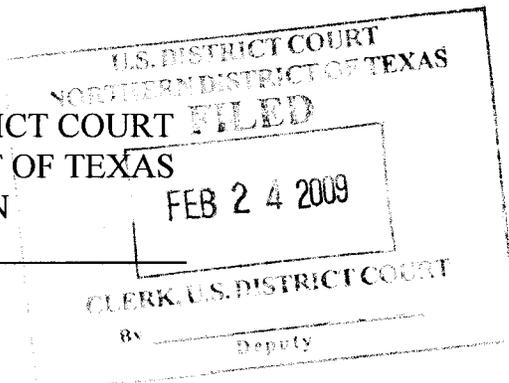


IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION



UNITED STATES OF AMERICA

§  
§  
§  
§  
§  
§

v.

Criminal No.

RICHARD LEON GOYETTE (1)  
also known as Michael Jurek

2 - 09 CR - 011 - J

INDICTMENT

The Grand Jury charges:

Count One  
Threats and False Information  
(18 U.S.C. § 844(e))

On or about October 18, 2008, in the Amarillo Division of the Northern District of Texas, and elsewhere, the defendant, **Richard Leon Goyette, also known as Michael Jurek**, by means and use of an instrument of commerce, that is, the use of the mail, did knowingly and willfully, threaten to kill, injure, intimidate people, and unlawfully damage and destroy a building, vehicle, and real property by means of fire and explosives, in that the defendant sent a letter to:

JPMorgan Chase & Company  
Attn: Jamie Dimon  
270 Park Avenue  
New York, NY 10017

said mail containing threats of bombing and killing people at the JP Morgan Chase & Company's corporate headquarters within six months.

In violation of 18 U.S.C. § 844(e).

Counts Two through Sixty-Five  
 Threats and Hoaxes  
 (18 U.S.C. § 1038(a)(1))

On or about October 18, 2008, in the Amarillo Division of the Northern District of Texas, and elsewhere, the defendant, **Richard Leon Goyette, also known as Michael Jurek**, did intentionally convey false and misleading information, that is: the defendant sent letters to the entities listed below which contained an unknown white powder and the threat of the person breathing the powder would die within 10 days, under circumstances where such information may reasonably have been believed, that indicated that an activity had taken place, was taking place, and would take place, that is: the recipient had been exposed to a lethal substance and would die, that would constitute a violation of 18 U.S.C. chapter 10 (biological weapons), and chapter 11B (chemical weapons).

All in violation of 18 U.S.C. § 1038(a)(1).

| <u>Count</u> | <u>Date Received</u> | <u>Victim Entity</u> | <u>Exact Address on Envelope</u>  |
|--------------|----------------------|----------------------|---|
| 2            | 10/20/2008           | Chase Bank           | Chase Bank<br>Attn: Loans/Customer Service<br>3300 Colorado Blvd<br>Denver, CO 80205    |
| 3            | 10/20/2008           | Chase Bank           | Chase Bank<br>Attn: Loans/Customer Service<br>1760 16th St<br>Denver, CO 80202          |
| 4            | 10/20/2008           | Chase Bank           | Chase Bank<br>Attn: Loans/Customer Service<br>16746 E Smoky Hill Rd<br>Aurora, CO 80015 |

**Count**      **Date Received**      **Victim Entity**      **Exact Address on Envelope**

|    |            |            |   |
|----|------------|------------|---|
| 5  | 10/20/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>14417 W Colfax<br>Lakewood, CO 80401                            |
| 6  | 10/20/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>100 Detroit St<br>Denver, CO 80206                              |
| 7  | 10/20/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>12860 W Alameda Pkwy<br>Lakewood, CO 80228                      |
| 8  | 10/20/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>3501 S Tower Rd<br>Aurora, CO 80013                             |
| 9  | 10/20/2008 | FDIC       | FDIC Public Information Center<br>Section 515<br>3501 North Fairfax Drive, Room E-1002<br>Arlington, VA 22226 |
| 10 | 10/21/2008 | Chase Bank | Chase Card Services<br>P.O. Box 94014<br>Palatine, IL 60094-4014  |
| 11 | 10/22/2008 | Chase Bank | Chase Card Services<br>Attn: Payment Processing<br>2500 Westfield Dr<br>Elgin, IL 60124                       |
| 12 | 10/22/2008 | OTS        | Office of Thrift Supervision<br>1 South Wacker Dr<br>Suite 2000<br>Chicago, IL 60606                          |
| 13 | 10/22/2008 | OTS        | Pacific Plaza<br>2001 Junipero Serra<br>Boulevard, Suite 650<br>Daly City, CA 94014-3897                      |

**Count**      **Date Received**      **Victim Entity**      **Exact Address on Envelope**

|    |            |            |  |
|----|------------|------------|--|
| 14 | 10/20/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>8015 Kipling St<br>Arvada, CO 80005                  |
| 15 | 10/20/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>9379 N Sheridan Blvd<br>Westminster, CO 80031        |
| 16 | 10/20/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>3093 W 104th Ave<br>Westminster, CO 80031            |
| 17 | 10/21/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>75 E Kennedy Blvd<br>Lakewood, NJ 08701              |
| 18 | 10/21/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>320 Applegath Rd<br>Monroe, NJ 08831                 |
| 19 | 10/21/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>5 E Railroad Ave<br>Jamesburg, NJ 08831              |
| 20 | 10/21/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>24 Main St<br>Toms River, NJ 08753                   |
| 21 | 10/21/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>1550 Georges Rd<br>North Brunswick, NJ 08902         |
| 22 | 10/21/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>4180 Us Rte 1, Bldg 300<br>South Brunswick, NJ 08852 |

**Count**      **Date Received**      **Victim Entity**      **Exact Address on Envelope**

|    |            |            |   |
|----|------------|------------|---|
| 23 | 10/21/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>1605 Us Hwy 22<br>Watchung, NJ 07069                            |
| 24 | 10/21/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>4921 Us Hwy 9<br>Howell, NJ 07731                               |
| 25 | 10/21/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>200 W Second St, Ste 101<br>Plainfield, NJ 07060                |
| 26 | 10/22/2008 | OTS        | Office of Thrift Supervision<br>Harborside Financial Center Plaza Five<br>Suite 1600<br>Jersey City, NJ 07311 |
| 27 | 10/22/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>877 St George Ave<br>Woodbridge, NJ 07095                       |
| 28 | 10/22/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>2950 W Peroria Ave<br>Phoenix, AZ 85029                         |
| 29 | 10/22/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>5041 N 16th St<br>Phoenix, AZ 85016                             |
| 30 | 10/22/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>12240 N Tatum Blvd<br>Phoenix, AZ 85032                         |
| 31 | 10/22/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>2901 N 7th Ave<br>Phoenix, AZ 85013                             |

**Count      Date Received      Victim Entity      Exact Address on Envelope**

|    |            |            |   |
|----|------------|------------|---|
| 32 | 10/28/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>5941 E Mckellips<br>Mesa, AZ 85215                              |
| 33 | 10/22/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>910 E Warner Rd<br>Gilbert, AZ 85296                            |
| 34 | 10/22/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>1528 E Buckeye Rd<br>Phoenix, AZ 85034                          |
| 35 | 10/22/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>4353 E Main St<br>Mesa, AZ 85205                                |
| 36 | 10/22/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>4924 E Shea<br>Scottsdale, AZ 85254                             |
| 37 | 10/22/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>6030 N 19th Ave<br>Phoenix, AZ 85015                            |
| 38 | 10/21/2008 | OTS        | Office of Thrift Supervision<br>225 E. John Carpenter<br>Freeway, Suite 500<br>Irving, TX 75062-2326          |
| 39 | 10/21/2008 | FDIC       | FDIC as Receiver of Washington Mutual<br>Bank<br>1601 Bryan St<br>Dallas, TX 75201<br>Attention: Claims Agent |
| 40 | 10/20/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>3600 W Robinson St<br>Norman, OK 73072                          |

**Count**      **Date Received**      **Victim Entity**      **Exact Address on Envelope**

|    |            |            |   |
|----|------------|------------|---|
| 41 | 10/20/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>2200 N Western Ave<br>Oklahoma City, OK 73106 |
| 42 | 10/20/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>1795 Garth Brooks Blvd<br>Yukon, OK 73099     |
| 43 | 10/20/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>13805 N May Ave<br>Oklahoma City, OK 73134    |
| 44 | 10/20/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>3724 N May Ave<br>Oklahoma City, OK 73112     |
| 45 | 10/20/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>18 E 15th St<br>Edmond, OK 73013              |
| 46 | 10/20/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>1200 Nw 63rd St<br>Oklahoma City, OK 73116    |
| 47 | 10/20/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>12324 N May Ave<br>Oklahoma City, OK 73120    |
| 48 | 10/23/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>320 N Broadway Ave<br>Oklahoma City, OK 73102 |
| 49 | 10/21/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>4000 Morse Crossing<br>Columbus, OH 43219     |

**Count**      **Date Received**      **Victim Entity**      **Exact Address on Envelope**

|    |            |            |   |
|----|------------|------------|---|
| 50 | 10/21/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>833 S High St<br>Columbus, OH 43206         |
| 51 | 10/21/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>1500 W 5th Ave<br>Columbus, OH 43212        |
| 52 | 10/21/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>2031 W Henderson Rd<br>Columbus, OH 43220   |
| 53 | 10/21/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>4810 Sawmill Rd<br>Columbus, OH 43235       |
| 54 | 10/21/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>3471 S High St<br>Columbus, OH 43207        |
| 55 | 10/21/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>3233 Cleveland Ave<br>Columbus, OH 43224    |
| 56 | 10/21/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>2161 Stringtown Rd<br>Grove City, OH 43123  |
| 57 | 10/22/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>4100 Buckeye Pkwy<br>Grove City, OH 43123   |
| 58 | 10/27/2008 | Chase Bank | Chase Bank<br>Attn: Loans/Customer Service<br>1600 Hilliard Rome Rd<br>Hilliard, OH 43026 |

**Count**      **Date Received**      **Victim Entity**      **Exact Address on Envelope**

|    |            |            |  |
|----|------------|------------|--|
| 59 | 10/21/2008 | Chase Bank | Office of Thrift Supervision<br>1475 Peachtree St. NE<br>Atlanta, GA 30309     |
| 60 | 10/23/2008 | FDIC       | FDIC<br>Attn: Shelia Bair<br>550 17th St. NW<br>Washington, DC 20429-9990      |
| 61 | 10/23/2008 | FDIC       | FDIC<br>Attn: Martin Gruenberg<br>550 17th St. NW<br>Washington, DC 20429-9990 |
| 62 | 10/23/2008 | FDIC       | FDIC<br>Attn: John Bovenzi<br>550 17th St. NW<br>Washington, DC 20429-9990     |
| 63 | 10/24/2008 | FDIC       | FDIC<br>FDIC Webmaster<br>550 17th Street, NW<br>Washington, DC 20429          |
| 64 | 10/23/2008 | OTS        | Office of Thrift Supervision<br>1700 G Street, NW<br>Washington, DC 20552      |

Count      Date Received      Victim Entity      Exact Address on Envelope

|    |            |            |   |
|----|------------|------------|---|
| 65 | 10/21/2008 | Chase Bank | Card Member Services<br>P.O. Box 15148<br>Wilmington, DE 19886-5148 |
|----|------------|------------|---|

A TRUE BILL:

  
FOREPERSON

JAMES T. JACKS  
ACTING UNITED STATES ATTORNEY



CHRISTYL L. DRAKE  
Assistant United States Attorney  
Texas State Bar No. 06104500  
500 S. Taylor, Suite 300, LB 238  
Amarillo, Texas 79101  
Telephone: 806.324.2356  
Facsimile: 806.324.2399  
E-Mail: [christy.drake@usdoj.gov](mailto:christy.drake@usdoj.gov)

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION

---

THE UNITED STATES OF AMERICA

v.

RICHARD LEON GOYETTE (1)  
also known as Michael Jurek

---

INDICTMENT

18 U.S.C. § 844(e)  
Threats and False Information

18 U.S.C. § 1038(a)(1)  
Threats and Hoaxes

(65 Counts)

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A true bill rendered:

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AMARILLO

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Filed in open court this 24<sup>th</sup> day of February, A.D. 2009.

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*Sharon Pauls*

*Deputy*  
Clerk

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Warrant to issue for Defendant.

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*W. Lynn L. Summers*

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UNITED STATES DISTRICT JUDGE

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PENDING CRIMINAL COMPLAINT 2:09-MJ-04

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS

Related Case Information

Superseding Indictment:  Yes  No New Defendant:  Yes  No  
Pending CR Case in NDTX:  Yes  No If Yes, number: \_\_\_\_\_  
Search Warrant Case Number 2:09-MJ-05 & 2:09-MJ-06  
R 20 from District of \_\_\_\_\_ N/A  
Magistrate Case Number 2:09-MJ-04

1. Defendant Information

Juvenile:  Yes  No  
If Yes, Matter to be sealed:  
 Yes  No

**2 - 0 9 C R - 0 1 . 1 - J**

Summons  Warrant  In Custody

Defendant Name Richard Leon Goyette (1)  
Alias Name Michael Jurek  
Address \_\_\_\_\_  
\_\_\_\_\_

County in which offense was committed: Randall Cnty

2. U.S. Attorney Information

AUSA Christy Drake Bar # 06104500

3. Interpreter

Yes  No If Yes, list language and/or dialect: \_\_\_\_\_

4. Location Status

Arrest Date \_\_\_\_\_  
 Already in Federal Custody as of \_\_\_\_\_ in \_\_\_\_\_  
 Already in State Custody  
 On Pretrial Release

5. U.S.C. Citations

Total # of Counts as to This Defendant: 65  Petty  Misdemeanor  Felony

| Citation                   | Description of Offense Charged       | Count(s)            |
|----------------------------|--------------------------------------|---------------------|
| <u>18 USC § 844(e)</u>     | <u>Threats and False Information</u> | <u>1</u>            |
| <u>18 USC § 1038(a)(1)</u> | <u>Threats and Hoaxes</u>            | <u>2 through 65</u> |
| _____                      | _____                                | _____               |
| _____                      | _____                                | _____               |

(May be continued on reverse)

Date 1-28-09

Signature of AUSA: *Christy Drake*