

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

2019 NOV 21 PM 4:38

UNITED STATES OF AMERICA)

v.)

STUART KURT ROLLINS,)
Defendant.)

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BY [Signature]
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Criminal No.

2:19-cr-156-1

INDICTMENT

The Grand Jury charges:

Count One

On or about July 29, 2019, in the District of Vermont, the defendant, STUART KURT ROLLINS, did, by force and threat of force, willfully intimidate and interfere with, and attempt to intimidate and interfere with members of the same family, namely, J.D., Jr., a Hispanic man; M.D., a Hispanic woman; and B.D., G.D., and M.D., Hispanic minors, because of their race and national origin and because they were occupying a dwelling, a home across the street from the defendant's residence; specifically, the defendant shouted derogatory comments about the family's race and national origin, told family members to go back to their country, and threatened to burn down the family's home and to set members of the D. family on fire. The offense involved the threatened use of fire.

(42 U.S.C. §3631(a))

Count Two

On or about July 29, 2019, in the District of Vermont, the defendant, STUART KURT ROLLINS, did, by force and threat of force, willfully intimidate and interfere with, and attempt to intimidate and interfere with H.D.'s right to associate in her home with members of another race and national origin, here, the D. family, because of the D. family's race and national origin and because the D. family was occupying a dwelling; specifically, the defendant threatened to burn down the home that H.D., a Caucasian woman, occupies with members of her family who are Hispanic. The offense involved the threatened use of fire.

(42 U.S.C. §3631(b)(1))

A TRUE BILL



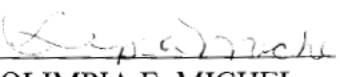
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