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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

March 2022 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT RUNDO,
ROBERT BOMAN, and
TYLER LAUBE,

Defendants.

CR No. 18-759(A)-CJC

F I R S T
S U P E R S E D I N G
I N D I C T M E N T

[18 U.S.C. § 371: Conspiracy; 18 U.S.C. § 2101: Riots; 18 U.S.C. § 2(a): Aiding and Abetting]

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

1. Beginning in or around February 2017, defendants ROBERT RUNDO ("RUNDO"), ROBERT BOMAN ("BOMAN"), and TYLER LAUBE ("LAUBE"), along with others known and unknown to the Grand Jury, participated in a white nationalist organization originally named the "DIY Division" and later re-named the "Rise Above Movement," or "RAM."

2. Defendants and their co-conspirators presented RAM publicly, through various social-media platforms and other means, as a combat-ready, militant group of a new nationalist white supremacy and identity movement.

1 3. Defendants and their co-conspirators used the Internet to
2 post videos and pictures of themselves conducting training in hand-
3 to-hand combat, often interspersed with pictures and video clips of
4 themselves assaulting people at political events, accompanied by
5 messages in support of their white supremacist ideology.

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COUNT ONE

[18 U.S.C. § 371]

1 A. OBJECT OF THE CONSPIRACY

2 4. The allegations set forth in paragraphs 1 through 3 are
3 incorporated by reference as if fully set forth herein.

4 5. Beginning on a date unknown but not later than in or around
5 March 2017, and continuing until on or about May 2018 in Los Angeles
6 County, within the Central District of California, and elsewhere,
7 defendants RUNDO, BOMAN, and LAUBE, along with others known and
8 unknown to the Grand Jury, conspired and agreed with each other to
9 commit an offense against the United States, namely, rioting, in
10 violation of Title 18, United States Code, Section 2101.

11 B. THE MANNER AND MEANS OF THE CONSPIRACY

12 6. The object of the conspiracy was to be accomplished, in
13 substance, as follows:

14 a. Defendants RUNDO, BOMAN, and others known and unknown
15 to the Grand Jury would use text messages and the Internet to recruit
16 others to train for and engage in acts of violence at political
17 rallies and organized demonstrations;

18 b. Defendants RUNDO, BOMAN, and others known and unknown
19 to the Grand Jury would use text messages and the Internet to
20 coordinate hand-to-hand and other combat training to prepare to
21 engage in violence at political rallies and organized demonstrations;

22 c. Defendants RUNDO, BOMAN, LAUBE, and others known and
23 unknown to the Grand Jury would engage in hand-to-hand and other
24 combat training to prepare to engage in violence at political rallies
25 and organized demonstrations;

26 d. Defendants RUNDO, BOMAN, LAUBE, and others known and
27 unknown to the Grand Jury would travel to political rallies and
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1 organized demonstrations and assault individuals they identified as
2 holding opposing political views;

3 e. Defendants RUNDO, BOMAN, and others known and unknown
4 to the Grand Jury would use the Internet to share videos and
5 photographs of themselves and each other committing acts of violence
6 at political rallies and organized demonstrations to recruit more
7 people to engage in violence at future events.

8 C. OVERT ACTS

9 7. On or about the following dates, in furtherance of the
10 conspiracy and to accomplish its object, defendants RUNDO, BOMAN,
11 LAUBE, and others known and unknown to the Grand Jury committed the
12 following overt acts within the Central District of California, and
13 elsewhere:

14 **March 25, 2017: Huntington Beach, California**

15 Overt Act No. 1: Beginning no later than on a date unknown
16 but not later than in or around October 2009, and continuing until on
17 or about May 2018, defendants RUNDO, BOMAN, and LAUBE registered and
18 operated social media accounts for the purpose of recruiting others
19 to join RAM, updating members on upcoming events and trainings, and
20 publicizing events, including depictions of RAM members engaging in
21 violence at organized events.

22 Overt Act No. 2: On or about March 4, 2017, a RAM associate
23 sent a message through an online social media platform to RAM members
24 and other associates suggesting that the group should start training
25 "group fighting," including "3v3, 1v2, etc." Defendant RUNDO
26 responded to the message stating, "100%. But with the newer guys they
27 gotta get the basics down first."
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1 Overt Act No. 3: On or about March 15, 2017, defendants
2 RUNDO, BOMAN, and LAUBE along with others, engaged in combat training
3 in San Clemente, California, to prepare to engage in violence at
4 upcoming political events.

5 Overt Act No. 4: On or about March 18, 2017, a RAM associate
6 sent messages through an online social media platform to RAM members
7 and other associates to coordinate combat training, listing defendant
8 RUNDO as the point of contact, to prepare RAM members and others to
9 engage in violence at upcoming political events in Huntington Beach,
10 California and Berkeley, California.

11 Overt Act No. 5: On or about March 22, 2017, defendant RUNDO
12 sent a message on an online social media platform to another
13 associate stating, "I will be bring the [RAM] banner with some of the
14 guys I train with anyone want to take part in carting it let me kno."

15 Overt Act No. 6: On or about March 25, 2017, defendants
16 RUNDO, BOMAN, LAUBE and other RAM members attended a political rally
17 in Huntington Beach, California (the "Huntington Beach Rally").

18 Overt Act No. 7: On or about March 25, 2017, defendant RUNDO
19 committed, participated in, and aided and abetted one or more acts of
20 violence against individuals at the Huntington Beach Rally.

21 Overt Act No. 8: On or about March 25, 2017, defendant BOMAN
22 committed, participated in, and aided and abetted one or more acts of
23 violence against individuals at the Huntington Beach Rally.

24 Overt Act No. 9: On or about March 25, 2017, defendant LAUBE
25 committed, participated in, and aided and abetted one or more acts of
26 violence against individuals at the Huntington Beach Rally.

27 Overt Act No. 10: On or about March 26, 2017, defendant BOMAN
28 posted on his Facebook account a link to an article on The Daily

1 Stormer titled "Trumpenkriegers Physically Remove Antifa Homos in
2 Huntington Beach," along with the comment, "We did it fam."

3 Overt Act No. 11: On or about March 26, 2017, defendant BOMAN
4 posted a photograph on his Facebook account showing himself and other
5 RAM members at the Huntington Beach Rally, along with the comment,
6 "Hail victory and the alt-reich."

7 **April 15, 2017: Berkeley, California**

8 Overt Act No. 12: From on or about March 27, 2017 through on
9 or about April 3, 2017, a RAM member used interstate communications,
10 including text messages, and Facebook and Twitter messages, to
11 recruit individuals to attend and to provide "security" at a
12 political event in Berkeley, California, on April 15, 2017 (the
13 "Berkeley Rally"), where they would be prepared to engage in hand to
14 hand combat.

15 Overt Act No. 13: On April 3, 2017, the RAM member posted a
16 Twitter message to another Twitter user, stating "[t]he boys from the
17 recent Huntington Beach rally who kicked antifa off the beach, are
18 going to Berkely 4/15. Can you put some heart in them?"

19 Overt Act No. 14: On or about April 13, 2027, defendant RUNDO
20 sent a YouTube link to other RAM members and associates on a social
21 medial platform showing large groups of individuals engaging in hand-
22 to-hand combat, with the following message: "I was thinking along
23 these lines."

24 Overt Act No. 15: On or about April 14, 2017, a RAM member
25 used a Visa credit card with account number ending in 0807 to rent a
26 multi-passenger van from Airport Van Rental at the Los Angeles
27 International Airport, and used the van to transport defendants RUNDO
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1 and BOMAN, and other RAM members from Southern California to the
2 Berkeley Rally.

3 Overt Act No. 16: On or about April 14, 2017, defendants RUNDO
4 and BOMAN used and caused to be used a Visa credit card belonging to
5 an associate to reserve hotel rooms for themselves at a Courtyard by
6 Marriott hotel in Richmond, California, to facilitate their
7 attendance at the Berkeley Rally.

8 Overt Act No. 17: On or about April 15, 2017, defendant RUNDO
9 exchanged messages on a social media platform with the leader of
10 another organization to coordinate their activities at the Berkeley
11 Rally.

12 Overt Act No. 18: On or about April 15, 2017, defendants
13 RUNDO, BOMAN, and other RAM members prepared to commit acts of
14 violence at the Berkeley Rally by wearing some combination of
15 coordinating grey shirts, goggles, mouth guards, athletic tape around
16 their wrists, and black face masks with white skeleton designs.

17 Overt Act No. 19: On or about April 15, 2017, defendant RUNDO
18 committed, participated in, and aided and abetted one or more acts of
19 violence against individuals at the Berkeley Rally, including against
20 a Berkeley Police Department police officer.

21 Overt Act No. 20: On or about April 15, 2017, defendant BOMAN
22 committed, participated in, and aided and abetted one or more acts of
23 violence against individuals at the Berkeley Rally.

24 Overt Act No. 21: On or about April 15, 2017, a RAM member
25 wrote to a representative of a media company seeking footage of the
26 Berkeley Rally, "We chased over a hundre[d] of them down the street
27 for 2 blocks. We were savage. Give a shout out to the [Huntington
28 Beach] boys who went to Berkeley. We'll love y[o]u forever."

1 Overt Act No. 22: On or about April 16, 2017, defendant BOMAN
2 posted a photograph on his Facebook page showing him punching persons
3 at the Berkeley Rally along with the caption, "Oooooi vey!!!
4 Dagoyiiiiim knooooow."

5 Overt Act No. 23: On or about April 16, 2017, defendant BOMAN
6 posted a photograph on his Facebook account containing a Twitter post
7 in which a journalist identified defendant BOMAN and another RAM
8 member at the Berkeley Rally and accused them of shoving him.
9 Defendant BOMAN wrote, "You come face to face with the enemy, what do
10 you expect. . . [.]"

11 Overt Act No. 24: On or about April 16, 2017, a RAM member
12 sent a text message to a RAM associate describing his actions at the
13 Berkeley Rally, and stating, "I was about to jump into that but our
14 guys were just wrecking them, like not even any room to get a hit in.
15 I was like alright, u guys got it handled then lol." The associate
16 responded, "I've been looking at videos. There's a grey-shirted
17 storm trooper at the fucking front every, single, time. You guys
18 were lions." The RAM member replied, "Total Aryan victory."

19 Overt Act No. 25: On or about April 19, 2017, defendant RUNDO
20 sent a text message to another RAM member to thank him for attending
21 the Berkeley Rally, and then invited him to combat training and
22 offered to buy lunch for all who attend.

23 Overt Act No. 26: On or about April 20, 2017, a RAM member
24 wrote on Facebook to defendant BOMAN and other members to request
25 that they participate in another rally in Berkeley on April 27, 2017,
26 stating, "Berkeley again. Returning victors. They're going to
27 f[e]el like th[e] SoCal boys OWN their town," and "we can't let
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1 antifa make a comeback. Another shaming will break them, a victory
2 will make it like Berkeley ne[v]er happened."

3 Overt Act No. 27: On or about April 21, 2017, a RAM member
4 sent a text message to another RAM member to invite him to the April
5 27, 2017, political rally in Berkeley, California, stating that he
6 was "driving up to deny antifa a face-saving victory," and intended
7 to "leave in the morning, drive fast, get up there early so we can
8 stretch out and power up, hit it hard and skip town."

9 **June 10, 2017: San Bernardino, California**

10 Overt Act No. 28: On or about June 1, 2017, a RAM member sent
11 a Facebook message to a RAM associate stating that he and 30 other
12 RAM members were planning to "take over" a "normie" march and shared
13 photographs of signs that RAM members planned to carry at the march.

14 Overt Act No. 29: On or about June 10, 2017, defendant RUNDO
15 and other RAM members attended a political rally in San Bernardino,
16 California (the "San Bernardino Rally") carrying several of the signs
17 had been shared via Facebook on June 1, 2017.

18 Overt Act No. 30: On or about June 10, 2017, defendant RUNDO
19 and other RAM members committed, participated in, and aided and
20 abetted one or more acts of violence against persons and property at
21 the San Bernardino Rally.

22 Overt Act No. 31: On or about June 11, 2017, the RAM Instagram
23 account posted a photograph of defendant RUNDO and other RAM members
24 at the San Bernardino Rally, and the comment, "Just another block
25 taken from #antifa cowards!!!!!!!!!"

26 Overt Act No. 32: On or about June 11, 2017, defendant RUNDO
27 wrote to a RAM associate on a social media platform and offered to
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1 send the associate a video recording showing "us smashing the antifa
2 car and chas[ing them" at the San Bernardino Rally.

3 Overt Act No. 33: On or about June 13, 2017, a RAM member sent
4 a text message to a RAM associate, stating, "We smashed some antifa
5 as they were leaving." The associate responded, "If it wasn't for
6 the White Nationalists nothing would ever get done." The RAM member
7 replied, "This is true would've been no victory in Huntington or
8 Berkeley."

9
10 **August 11-12, 2017: Charlottesville, Virginia**

11 Overt Act No. 34: On or about June 18, 2017, two RAM members
12 exchanged text messages regarding booking flights to the Unite the
13 Right rally in Charlottesville, Virginia on August 11-12, 2017 (the
14 "Charlottesville Rally").

15 Overt Act No. 35: On or about July 23, 2017, defendant RUNDO
16 used the Internet to post a RAM promotional video showing RAM members
17 assaulting counter-protestors at the Huntington Beach Rally and the
18 Berkeley Rally.

19 Overt Act No. 36: On or about July 26, 2017, defendant RUNDO
20 sent a Twitter message from the RAM Twitter account to another
21 Twitter user stating, "hope we can get y'all some more commie
22 beatdown vids soon - Antifa never learn ☺."

23 Overt Act No. 37: On or about August 10, 2017, defendant BOMAN
24 posted a photograph on his Facebook page showing himself punching a
25 person at the Berkeley Rally.

26 Overt Act No. 38: On or about August 10-11, several RAM
27 members traveled from Los Angeles, California, to Charlottesville,
28 Virginia to attend the Charlottesville Rally.

1 Overt Act No. 39: On or about August 12, 2017, several RAM
2 members attended the Charlottesville Rally, where they committed,
3 participated in, and aided and abetted one or more acts of violence
4 against individuals at the Charlottesville Rally.

5 **August 2017-May 2018: RAM Members Celebrate Their Assaults and**
6 **Train For Future Events**

7 Overt Act No. 40: On or about September 14, 2017, defendant
8 RUNDO posted a Twitter message containing a photograph of other RAM
9 members assaulting counter-protestors at the Berkeley Rally, with the
10 accompanying text: "#antiantifa, #goodnightleftside,
11 #riseabovemovement."

12 Overt Act No. 41: On or about September 25, 2017, a RAM member
13 sent a text message to another RAM member stating that he was "back
14 in a position to go hard with activism" after having been
15 "sidetracked after Berkeley." The receiving RAM member replied that
16 people were "laying a little low on account of [Charlottesville]
17 fallout," and the sending RAM member replied that they could pursue
18 other avenues, and he had "been working on souring Mexicans on
19 visiting my mountain community."

20 Overt Act No. 42: On or about December 17, 2017, defendant
21 RUNDO used the Internet to post a promotional video showing
22 defendants RUNDO, BOMAN, LAUBE, and other RAM members assaulting
23 persons at the Huntington Beach Rally and the Berkeley Rally,
24 combined with videos and pictures of RAM members engaging in combat
25 training.

26 Overt Act No. 43: On or about January 10, 2018, defendant
27 RUNDO posted a Twitter message from the RAM Twitter account, stating,
28

1 "What's up with giving a shoutout to the only alt right crew that
2 actually beats antifa senseless and wins rallies."

3 Overt Act No. 44: On or about January 17, 2018, defendant
4 RUNDO posted a Twitter message from the RAM Twitter account, stating,
5 "From the guys that [won] every rally they ever attended and always
6 chased out antifa."

7 Overt Act No. 45: On or about February 5, 2018, defendant
8 RUNDO posted a Twitter message from the RAM Twitter account
9 containing a photograph of RAM members, covering their faces with
10 books, stating, "When the squads not out smashing commies . . .
11 #nationalist #lifestyle."

12 Overt Act No. 46: On or about February 15, 2018, defendant
13 RUNDO posted a Twitter message from the RAM Twitter account
14 containing a photograph of RAM members, including defendants RUNDO
15 and BOMAN and other RAM members, at the Huntington Beach Rally,
16 standing behind a large banner with the accompanying text, "Shortly
17 after this pic antifa was [blown the fuck out] in Huntington Beach."

18 Overt Act No. 47: On or about April 18, 2018, defendant RUNDO
19 and other RAM members traveled to Germany, Ukraine, and Italy, where
20 they engaged in combat training with members of European white
21 supremacist organizations.

22 Overt Act No. 48: On or about May 15, 2018, defendant RUNDO
23 sent a Twitter message from the RAM Twitter account to another
24 Twitter user who had proposed interviewing RAM leaders on a podcast,
25 and stated, "Maybe if there [is] enough time could mention [Berkeley]
26 how we were the first guys to jump over the barrier and engage and
27 how that had a huge impact."

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COUNT TWO

[18 U.S.C. §§ 2101, 2(a)]

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3 8. The allegations set forth in paragraphs 1 through 3 are
4 incorporated by reference as if fully set forth herein.

5 9. Beginning on or about March 16, 2017, and continuing until
6 on or about April 15, 2017, in Los Angeles County, within the Central
7 District of California, defendants RUNDO and BOMAN, each aiding and
8 abetting the other, used facilities of interstate commerce with
9 intent to incite, participate in, and carry on a riot, and to commit
10 an act of violence in furtherance of a riot, and to aid or abet any
11 person in inciting and participating in and carrying on a riot and
12 committing any act of violence in furtherance of a riot, including
13 but not limited to:

14 a. Between March 16, 2017 and April 14, 2017, defendant
15 BOMAN sent Facebook messages to recruit RAM members and others to
16 attend an organized demonstration in Berkeley, California, on April
17 15, 2017 (the "Berkeley Rally").

18 b. Between March 18, 2017 and April 15, 2017, defendant
19 RUNDO sent messages through the online social media platform to
20 coordinate RAM members' attendance at the Berkeley Rally and to
21 arrange combat training events to prepare RAM members and associates
22 to engage in violence at the Berkeley Rally.

23 c. On or about April 14, 2017, defendants RUNDO and BOMAN
24 used and caused to be used a Visa credit card belonging to an
25 associate to reserve hotel rooms for themselves and others at a
26 Courtyard by Marriott hotel in Richmond, California.

27 10. During the course of such use of facilities of interstate
28 commerce and thereafter, on or about April 15, 2017, on and around

1 the grounds of Martin Luther King Jr. Civic Center Park in Berkeley,
2 California, defendants RUNDO and BOMAN incited, participated in, and
3 carried on a riot, committed acts of violence in furtherance of a
4 riot, and aided and abetted other persons inciting and participating
5 in and carrying on a riot and committing acts of violence in
6 furtherance of a riot.

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8 A TRUE BILL

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Foreperson

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15 E. MARTIN ESTRADA
16 United States Attorney

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18 ANNAMARTINE SALICK
19 Assistant United States Attorney
20 Chief, National Security Division

21 SOLOMON KIM
22 MARIA JHAI
23 Assistant United States Attorneys
24 Terrorism and Export Crimes Section
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