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FILED
U.S. DISTRICT COURT
2018 OCT 18 A 10:00
DISTRICT OF UTAH
BY: _____
DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, NORTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

WILLIAM CLYDE ALLEN, III,

Defendant.

Case No.

INDICTMENT

VIOLATIONS: 18 U.S.C. § 175(a),
Threaten To Use A Biological Toxin As
A Weapon; 18 U.S.C. § 871(a), Mailing
A Threat Against The President; 18
U.S.C. § 876(c), Mailing Threatening
Communications To An Officer Or An
Employee of the United States.

(Felony Complaint 2:18-MJ-565-DBP)

Case: 1:18-cr-00086
Assigned To : Sam, David
Assign. Date : 10/18/2018
Description

The Grand Jury Charges:

COUNT ONE

On or about September 24, 2018, in the Northern Division of the District of Utah
and elsewhere,

WILLIAM CLYDE ALLEN, III,

the defendant herein, did knowingly threaten to use a biological agent and toxin, namely RICIN, as a weapon; all in violation of 18 U.S.C. § 175(a).

COUNT TWO

From on or about September 24, 2018, and continuing until on or about October 1, 2018, in the Northern Division of the District of Utah and elsewhere,

WILLIAM CLYDE ALLEN, III,

the defendant herein, did knowingly and willfully deposit and cause to be deposited for conveyance in the mail and for a delivery from any post office and by any letter carrier a letter, paper, writing and document containing a threat to inflict bodily harm upon the President of the United States; to wit: a letter containing the following language:

“Jack and the Missile Bean Stock Powder”

and containing castor bean material; all in violation of 18 U.S.C. § 871(a).

COUNT THREE

From on or about September 24, 2018, and continuing until on or about October 1, 2018, in the Northern Division of the District of Utah and elsewhere,

WILLIAM CLYDE ALLEN, III,

the defendant herein, did knowingly deposit in any post office or authorized depository for mail matter, to be sent or delivered by the Postal Service, and knowingly caused to be delivered by the Postal Service according to the directions thereon, a communication addressed to another person and containing a threat to injure the person of the addressee, "James N. Mattis, Secretary of Defense, 1000 Defense Pentagon, Washington, DC 20301-1000," who is the United States Secretary of Defense and an officer and employee of the United States under 18 U.S.C. § 1114,; to wit; a letter containing the following language:

"Jack and the Missile Bean Stock Powder"

and containing castor bean material, all in violation of 18 U.S.C. § 876(c).

COUNT FOUR

From on or about September 24, 2018, and continuing until on or about October 1, 2018, in the Northern Division of the District of Utah, and elsewhere,

WILLIAM CLYDE ALLEN, III,

the defendant herein, did knowingly deposit in any post office or authorized depository for mail matter, to be sent or delivered by the Postal Service, and knowingly caused to be delivered by the Postal Service according to the directions thereon, a communication addressed to another person and containing a threat to injure the person of the addressee, "Admiral John M. Richardson, Chief of Naval Operations, 2000 Navy Pentagon, Washington, DC 20350-2000," who is Chief of Naval Operations, United States Navy,

and is an member of the uniformed services of the United States under 18 U.S.C. § 1114;;
to wit; a letter containing the following language:

“Jack and the Missile Bean Stock Powder”

and containing castor bean material, all in violation of 18 U.S.C. § 876(c).

COUNT FIVE

From on or about September 24, 2018, and continuing until on or about October 3, 2018, in the Northern Division of the District of Utah, and elsewhere,

WILLIAM CLYDE ALLEN, III,

the defendant herein, did knowingly deposit in any post office or authorize depository for mail matter, to be sent or delivered by the Postal Service, and knowingly caused to be delivered by the Postal Service according to the directions thereon, a communication addressed to another person and containing a threat to injure the person of the addressee, “Christopher A. Wray, FBI Headquarters, 935 Pennsylvania Ave. NW, Washington, DC 20535-0001,” who is Director of the Federal Bureau of Investigation, United States Department of Justice, and is an officer and employee of the United States under 18 U.S.C. § 1114;; to wit; a letter containing the following language:

“Jack and the Missile Bean Stock Powder”

and containing castor bean material, all in violation of 18 U.S.C. § 876(c).

COUNT SIX

From on or about September 24, 2018, and continuing until on or about October 3, 2018, in the Northern Division of the District of Utah, and elsewhere,

WILLIAM CLYDE ALLEN, III,

the defendant herein, did knowingly deposit in any post office or authorized depository for mail matter, to be sent or delivered by the Postal Service, and knowingly caused to be delivered by the Postal Service according to the directions thereon, a communication addressed to another person and containing a threat to injure the person of the addressee, "Gina Haspel, Central Intelligence Agency, Officer of Public Affairs, Washington, DC 20505," who is Director of the Central Intelligence Agency, and is an officer and employee of the United States under 18 U.S.C. § 1114; to wit; a letter containing the following language:

"Jack and the Missile Bean Stock Powder"

and containing castor bean material, all in violation of 18 U.S.C. § 876(c).

COUNT SEVEN

From on or about September 24, 2018, and continuing until on or about October 12, 2018, in the Northern Division of the District of Utah, and elsewhere,

WILLIAM CLYDE ALLEN, III,

the defendant herein, did knowingly deposit in any post office or authorized depository for mail matter, to be sent or delivered by the Postal Service, and knowingly caused to be delivered by the Postal Service according to the directions thereon, a communication

addressed to another person and containing a threat to injure the person of the addressee,
“Dr. Heather Wilson, Secretary of Air Force, Washington, DC 20330-1670,” who is the
United States Secretary of the Air Force and an officer and employee of the United States
under 18 U.S.C. § 1114,; to wit; a letter containing the following language:

“Jack and the Missile Bean Stock Powder”

and containing castor bean material, all in violation of 18 U.S.C. § 876(c).

A TRUE BILL:

FOREPERSON OF THE GRAND JURY

JOHN W. HUBER
United States Attorney



MARK K. VINCENT
Assistant United States Attorney



BRYAN R. WHITTAKER
Assistant United States Attorney