IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	**CRIMINAL NO. 14-621**
v.	:	**DATE FILED: _____**
GLEN JOSEPH	:	**VIOLATIONS:**
	:	**18 U.S.C. § 115(a)(1)(B) (threats to a law enforcement officer - 2 counts)**
	:	**18 U.S.C. § 871(a) (threats against the President - 1 count)**
	:	**18 U.S.C. § 875(c) (interstate communication of threats - 6 counts)**

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. On or about August 8, 2012, in Allentown, in the Eastern District of Pennsylvania, defendant GLEN JOSEPH posted a message on his public Facebook account stating the following:

> Make no mistake I am going to kill fbi special agent A[] S[]. . . . There is your threat . . . That's what you call a threat, I call it a promise. . . .

2. On or about August 8, 2012, in Allentown, in the Eastern District of Pennsylvania, defendant

GLEN JOSEPH

knowingly and willfully transmitted in interstate and foreign commerce, via a computer and the Internet, a threatening communication to others, that is, a communication containing a threat to injure the person of another, specifically, a threat to injure A.S., a retired law enforcement officer known to the grand jury.

In violation of Title 18, United States Code, Section 875(c).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about September 21, 2012, in Allentown, in the Eastern District of Pennsylvania, defendant GLEN JOSEPH posted on his public Facebook account a message, accompanied by a photograph of a decapitated Federal Bureau of Investigation ("FBI") agent lying on a bloodied American flag, stating the following:

> Where is that fbi pig A[] S[] . . . . This is how your going to end up fbi pig A[] S[]. . .

2. On or about September 21, 2012, in Allentown, in the Eastern District of Pennsylvania, defendant

GLEN JOSEPH

knowingly and willfully transmitted in interstate and foreign commerce, via a computer and the Internet, a threatening communication to others, that is, a communication containing a threat to injure the person of another, specifically, a threat to injure A.S.

In violation of Title 18, United States Code, Section 875(c).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about September 24, 2012, J.F. was a Special Agent of the Federal Bureau of Investigation ("FBI"), that is, a Federal law enforcement officer.

2. On or about September 24, 2012, in Allentown, in the Eastern District of Pennsylvania, defendant GLEN JOSEPH posted a message on his public Facebook account stating the following:

> fbi special agent J[] F[], that's why I called the new york fbi office and told them first I'm going to f[*]ck you in the a[*]s then I'm going to wrap a cord around your throat ... Did you get the message J[] F[]? . . . There is nothing the fbi can do. . . .

3. On or about September 24, 2012, in Allentown, in the Eastern District of Pennsylvania, defendant

GLEN JOSEPH

threatened to assault FBI Special Agent J.F., with intent to impede, intimidate, interfere with, and retaliate against Special Agent J.F. while she was engaged in, and on account of, the performance of her official duties.

In violation of Title 18, United States Code, Section 115(a)(1)(B).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 of Count 3 of this superseding indictment are incorporated here.

2. On or about September 24, 2012, in Allentown, in the Eastern District of Pennsylvania, defendant

GLEN JOSEPH

knowingly and willfully transmitted in interstate and foreign commerce, via a computer and the Internet, a threatening communication to others, that is, a communication containing a threat to injure the person of another, specifically, a threat to injure Federal Bureau of Investigation ("FBI") Special Agent J.F.

In violation of Title 18, United States Code, Section 875(c).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about September 30, 2012, J.F. was a Special Agent of the Federal Bureau of Investigation ("FBI"), that is, a Federal law enforcement officer.

2. On or about September 30, 2012, in Allentown, in the Eastern District of Pennsylvania, defendant GLEN JOSEPH posted on his public Facebook account a message stating the following, and accompanied by a photograph of FBI Special Agent J.F. with markings across her face:

> J[] F[] takes reigns of new york's fbi office, . . . you don't look butchy like most fbi females . . . I'm going to have a good time w/ you before I wrap a cord around your throat. . . .

3. On or about September 30, 2012, in Allentown, in the Eastern District of Pennsylvania, defendant

GLEN JOSEPH

threatened to assault FBI Special Agent J.F., with intent to impede, intimidate, interfere with, and retaliate against Special Agent J.F. while she was engaged in, and on account of, the performance of her official duties.

In violation of Title 18, United States Code, Section 115(a)(1)(B).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 of Count 5 of this superseding indictment are incorporated here.

2. On or about September 24, 2012, in Allentown, in the Eastern District of Pennsylvania, defendant

GLEN JOSEPH

knowingly and willfully transmitted in interstate and foreign commerce, via a computer and the Internet, a threatening communication to others, that is, a communication containing a threat to injure the person of another, specifically, a threat to injure Federal Bureau of Investigation ("FBI") Special Agent J.F.

In violation of Title 18, United States Code, Section 875(c).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about November 12, 2012, defendant GLEN JOSEPH posted a message on his public Facebook account stating the following:

> I can't believe nobody put a bullet in uncle tom obama's brain yet . . . someone bring me a gun I'll do it . . . . uncle tom obama you and your fbi buddies put me in the hospital now you're going to the morgue . . . that's my idea of an eye for an eye . . . .

2. On or about November 12, 2012, in Allentown, in the Eastern District of Pennsylvania, defendant

GLEN JOSEPH

knowingly and willfully threatened to take the life of, and to inflict bodily harm upon, the President of the United States.

In violation of Title 18 of the United States Code, Section 871(a).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 7 of this superseding indictment is incorporated here.

2. On or about November 12, 2012, in Allentown, in the Eastern District of Pennsylvania, defendant

GLEN JOSEPH

knowingly and willfully transmitted in interstate and foreign commerce, via a computer and the Internet, a threatening communication to others, that is, a communication containing a threat to injure the person of another, specifically, the President of the United States.

In violation of Title 18, United States Code, Section 875(c).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about October 22, 2014, in Allentown, in the Eastern District of Pennsylvania, defendant GLEN JOSEPH posted a message on his public Facebook account stating the following, above a photograph of Lehigh County Court of Common Pleas Judge R.S. and his wife:

> Parole Appointment 1:00 P. M Today … They still did not see the error of their ways, it has to be taught to them. The whole 15 Months I was in Prison my family was being told I couldn't be bailed out. The involved my family so turn about is fair play. . . . Judge R[] S[] was this photo taken while I was in Prison? This after I was called a Sand Ni[**]er by the FBI via Microwave Technology. Judge R[] S[], you brought your wife up at my Sentencing when you were laughing and smiling at me …

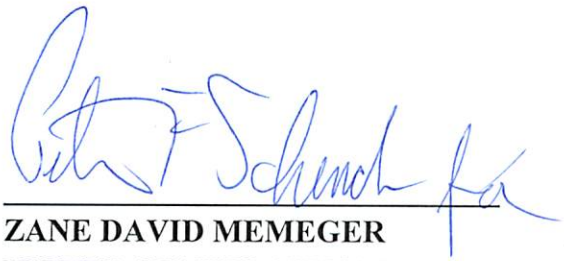
2. On or about October 22, 2014, in Allentown, in the Eastern District of Pennsylvania, defendant

GLEN JOSEPH

knowingly and willfully transmitted in interstate and foreign commerce, via a computer and the Internet, a threatening communication to others, that is, a communication containing a threat to injure the person of another, specifically, a threat to injure Lehigh County Court of Common Pleas Judge R.S. and his wife.

In violation of Title 18, United States Code, Section 875(c).

A TRUE BILL:



GRAND JURY FOREPERSON

ZANE DAVID MEMEGER
UNITED STATES ATTORNEY