

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Crim. No. 07-\_\_\_\_\_  
: :  
: 18 U.S.C. §§ 1038(a)(1) and 2  
v. :  
: :  
: INDICTMENT  
JAKE BRAHM :

The Grand Jury in and for the District of New Jersey,  
sitting in Newark, charges:

1. At all times relevant to this Indictment:

(a) Defendant JAKE BRAHM was a resident of Wauwatosa,  
Wisconsin.

(b) The Internet website [www.4chan.org](http://www.4chan.org) and the "Random"  
posting section of that website were publicly available to all  
Internet users, and accepted and publicly broadcasted messages  
and content from all Internet users.

(c) The New York Jets and New York Giants were  
professional football teams in the National Football League, and  
played their home games at Giants Stadium located in East  
Rutherford, New Jersey.

2. On or about October 22, 2006:

(a) The New York Jets were scheduled to play the  
Detroit Lions at Giants Stadium in East  
Rutherford, New Jersey.

(b) The Miami Dolphins were scheduled to play the  
Green Bay Packers in Miami, Florida.

- (c) The Atlanta Falcons were scheduled to play the Pittsburgh Steelers in Atlanta, Georgia.
- (d) The Seattle Seahawks were scheduled to play the Minnesota Vikings in Seattle, Washington.
- (e) The Houston Texans were scheduled to play the Jacksonville Jaguars in Houston, Texas.
- (f) The Oakland Raiders were scheduled to play the Arizona Cardinals in Oakland, California.
- (g) The Cleveland Browns were scheduled to play the Denver Broncos in Cleveland, Ohio.

3. In or about September 2006, defendant JAKE J. BRAHM posted on [www.4chan.org](http://www.4chan.org) a public message that threatened the detonation of explosive devices at seven stadiums hosting National Football League games on Sunday, October 22, 2006. The reference to "New York City" connoted Giants Stadium in East Rutherford, New Jersey, which is the home of the New York Giants and the New York Jets, and which was scheduled to host a New York Jets home game on October 22, 2006. Additionally, the message threatened that the explosive devices would cause radiological fallout resulting in numerous fatalities. The message stated, in substance and in part:

On Sunday, October 22nd, 2006, there will be seven "dirty" explosive devices detonated in seven different U.S. cities; Miami, New York City, Atlanta, Seattle, Houston, Oakland and Cleveland. The death toll will approach 100,000 from the initial blasts and countless other fatalities will later occur as result from radioactive fallout.

The bombs themselves will be delivered via trucks. These trucks will pull up to stadiums hosting NFL games in each respective city. All stadiums to be targeted are open air arenas, excluding Atlanta's Georgia Dome, the only enclosed stadium to be hit. Due to the open air, the radiological

fallout will destroy those not killed in the initial explosion. The explosions will be near simultaneous, with the cities specifically chosen in different time zones to allow for multiple attacks at the same time.

The 22nd of October will mark the final day of Ramadan as it would fall in Mecca. Al-Qaida will automatically be blamed for the attacks. Later, through Al-Jazeera, Osama bin Laden will issue a video message claiming responsibility for what he dubs "America's Hiroshima".

In the aftermath civil wars will erupt across the world, both in the Middle East and within the United States. Global economies will screech to a halt. General chaos will rule.

4. From in or around September 2006 to on or about October 20, 2006, defendant JAKE BRAHM re-posted the message described in paragraph 3, above, in whole or in part, approximately forty additional times on [www.4chan.org](http://www.4chan.org).

5. Before posting the message described in paragraph 3, above, defendant JAKE BRAHM researched which National Football League teams were playing on October 22, 2006, and listed the cities to connote those stadiums hosting the games.

6. Defendant JAKE BRAHM knew the message described in paragraph 3, above, was false when he authored it, and each time that he posted it on [www.4chan.org](http://www.4chan.org).

7. The Internet website [www.4chan.org](http://www.4chan.org) and the "Random" posting section of that website were available to all Internet users, and accordingly the message described in paragraph 3, above, was a communication in and affecting interstate commerce.

8. From in or around September 2006 to on or about October 20, 2006, in the District of New Jersey, and elsewhere, defendant

JAKE BRAHM

knowingly and willfully engaged in conduct with intent to convey false and misleading information under circumstances where such information may reasonably have been believed and where such information indicated that activity would take place that would constitute a violation of: (i) Chapter 40 of Title 18, United States Code (malicious damage of any building or vehicle, in violation of 18 U.S.C. § 844(i)); and (ii) Chapter 113B of Title 18, United States Code (use of weapons of mass destruction against persons or property within the United States, in violation of 18 U.S.C. § 2332a(a)(1)(D), and use of radiological dispersal devices designed and intended to release radiation or radioactivity at a level dangerous to human life, in violation of 18 U.S.C. § 2332h(a)(1)(A)).

In violation of Title 18, United States Code, Sections 1038(a)(1) and 2.

A TRUE BILL

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FOREPERSON

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CHRISTOPHER J. CHRISTIE  
United States Attorney

Criminal No. 07-

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***UNITED STATES DISTRICT COURT  
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UNITED STATES OF AMERICA

v.

**JAKE BRAHM**

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INDICTMENT

18 U.S.C. §§ 1038(a) & 2

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**CHRISTOPHER J. CHRISTIE**  
*U.S. ATTORNEY NEWARK, NEW JERSEY*

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*ASSISTANT U.S. ATTORNEY  
NEWARK, NEW JERSEY*

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