UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term

Grand Jury Sworn in on April 30, 2026

UNITED STATES OF AMERICA	:	**CRIMINAL NO.: 26-cr-00098-TNM**
	:	
v.	:	**VIOLATIONS:**
	:	
	:	**18 U.S.C. § 1751(c)**
COLE TOMAS ALLEN,	:	**(Attempt to Assassinate the President of**
	:	**the United States)**
Defendant.	:	
	:	**18 U.S.C. §§ 111(a)(1) & (b)**
	:	**(Assaulting an Officer or Employee of the**
	:	**United States with a Deadly Weapon)**
	:	
	:	**18 U.S.C. § 924(b)**
	:	**(Transportation of a Firearm and**
	:	**Ammunition in Interstate Commerce**
	:	**with the Intent to Commit a Felony)**
	:	
	:	**18 U.S.C. § 924(c)(1)(A)**
	:	**(Using, Carrying, Brandishing and**
	:	**Discharging a Firearm During a Crime**
	:	**of Violence)**
	:	
	:	**22 D.C. Code §§ 3152, 3153(j), 4502**
	:	**(Act of Terrorism While Armed (Attempt**
	:	**To Commit First Degree Murder))**

SUPERSEDING INDICTMENT

The Grand Jury charges that:

COUNT ONE

On or about April 25, 2026, in the District of Columbia, the defendant, **COLE TOMAS ALLEN**, did knowingly attempt to kill the President of the United States, Donald J. Trump.

(**Attempt to Assassinate the President of the United States,**
in violation of 18 U.S.C. § 1751(c))

COUNT TWO

On or about April 25, 2026, in the District of Columbia, defendant **COLE TOMAS ALLEN** did knowingly and by means and use of a deadly and dangerous weapon, that is a shotgun, forcibly assault, intimidate, and interfere with V.G., an officer and employee of the United States, while V.G. was engaged in his official duties and on account of the performance of his official duties.

(**Assaulting an Officer or Employee of the United States with a Deadly Weapon,** in violation of 18 U.S.C. §§ 111(a)(1) & (b))

COUNT THREE

Between on or about April 21, 2026, and on or about April 25, 2026, defendant **COLE TOMAS ALLEN** did knowingly transport in interstate commerce a Mossberg Maverick 88 12-gauge pump action shotgun, serial number MV2122609, a Rock Island Armory 1911 .38-caliber semi-automatic pistol, serial number RIA2383396, approximately 45 rounds of 12-gauge shotgun ammunition, and approximately 55 rounds of .38-caliber handgun ammunition from the State of California to Washington, D.C. with the intent to commit an offense punishable by imprisonment for a term exceeding one year and with knowledge and reasonable cause to believe that an offense punishable by imprisonment for a term exceeding one year was to be committed therewith, to wit: assassination of the President of the United States, assaulting an officer or employee of the United with a deadly weapon, and using, carrying, brandishing, and discharging a firearm during a crime of violence, as alleged in Counts One, Two, and Four of this Indictment.

(**Transportation of a Firearm and Ammunition in Interstate Commerce with the Intent to Commit a Felony,** in violation of 18 U.S.C. § 924(b))

COUNT FOUR

On or about April 25, 2026, defendant **COLE TOMAS ALLEN** did knowingly use, carry, brandish, and discharge a firearm during and in relation to, and in furtherance of, a crime of violence, for which he may be prosecuted in a court of the United States, that is, Count One and Count Two of this Indictment, which are incorporated herein.

(**Using, Carrying, Brandishing, and Discharging a Firearm During a Crime of Violence,** in violation of 18 U.S.C. § 924(c)(1)(A))

COUNT FIVE

On or about April 25, 2026, within the District of Columbia, defendant **COLE TOMAS ALLEN**, while armed with a dangerous weapon, that is, firearms and ammunition, knives, and other sharpened instruments, attempted to commit first degree murder by killing the President of the United States, Donald J. Trump, with the intent to influence the policy and conduct of a unit of government, that is, the office of the President of the United States and the federal executive departments and agencies within the President's command, by intimidation and coercion and with the intent to intimidate and coerce a significant portion of the civilian population of the United States and the District of Columbia.

(**Act of Terrorism While Armed (Attempt to Commit First Degree Murder),** in violation of 22 D.C. Code §§ 3152, 3153(j), and 4502 (2001 ed.))

A TRUE BILL

FOREPERSON

JEANINE FERRIS PIRRO
UNITED STATES ATTORNEY

By: _____
JOCELYN BALLANTINE
Deputy Chief, National Security Section