

Eastern District of Kentucky

FILED

MAY 02 2019

AT LEXINGTON
ROBERT R. CARR
CLERK U.S. DISTRICT COURT

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY
CENTRAL DIVISION
FRANKFORT**

UNITED STATES OF AMERICA

V.

INDICTMENT NO. 3:19-CR-28-GFVT

DYLAN LEE JARRELL

* * * * *

THE GRAND JURY CHARGES:

**COUNT 1
18 U.S.C. § 875(c)**

In or about May 2018, in Anderson County, in the Eastern District of Kentucky,
and elsewhere,

DYLAN LEE JARRELL

did knowingly and willfully transmit in interstate commerce a communication containing a threat to injure the occupants of a school, that is, the statement, "RIP DYLAN AND ERIC IM ABOUT TO DO IT BETTER THAN CHO," which **JARRELL** transmitted over the internet by posting on the Reddit website from the Reddit account "BigDaddy101-101-".

All in violation of 18 U.S.C. § 875(c).

COUNT 2
18 U.S.C. § 875(c)

On or about September 24, 2018, in Anderson County, in the Eastern District of Kentucky, and elsewhere,

DYLAN LEE JARRELL

did knowingly and willfully transmit in interstate commerce a communication containing a threat to injure D.B., that is, the statement, “You deserve to be raped and killed [expletive] idiot response to me before I slide thru with them choppas,” which **JARRELL** transmitted over the internet by using his mobile telephone to send a message from the Instagram account “suicidal_idol_” to an Instagram account associated with D.B.

All in violation of 18 U.S.C. § 875(c).

COUNT 3
18 U.S.C. § 875(c)

On or about September 24, 2018, in Anderson County, in the Eastern District of Kentucky, and elsewhere,

DYLAN LEE JARRELL

did knowingly and willfully transmit in interstate commerce a communication containing a threat to injure D.B., that is, the statement, “U deserve a beat down,” which **JARRELL** transmitted over the internet by using his mobile telephone to send a message from the Instagram account “suicidal_idol_” to an Instagram account associated with D.B.

All in violation of 18 U.S.C. § 875(c).

COUNT 4
18 U.S.C. § 2261A(2)

Beginning on a date in or about July 2018 and continuing through a date in or about September 2018, in Anderson County, in the Eastern District of Kentucky, and elsewhere,

DYLAN LEE JARRELL

with the intent to harass and intimidate D.B., used an electronic communication service and an electronic communication system of interstate commerce, that is, Instagram, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to D.B., that is, by sending the following messages to an Instagram account associated with D.B.:

Approximate Date	Message
July 30, 2018	Your [expletive] trash
July 30, 2018	Bitch
September 24, 2018	You deserve to be raped and killed [expletive] idiot response to me before I slide thru with them choppas
September 24, 2018	Idgaf how old u is
September 24, 2018	U deserve a beat down
September 24, 2018	I know you read them 2 messages too

All in violation of 18 U.S.C. § 2261A(2).

COUNT 5
18 U.S.C. § 2261A(2)

On or about October 17, 2018, in Anderson County, in the Eastern District of Kentucky, and elsewhere,

DYLAN LEE JARRELL

with the intent to harass and intimidate K.B., used an electronic communication service and an electronic communication system of interstate commerce, that is, Facebook, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to K.B., that is, by sending the following messages to a Facebook account associated with K.B.:

Approximate Date	Message
October 17, 2018	You wanna be a negro so bad lmfao. There's no such thing as white privileged you [expletive] autistic [expletive]. I hope your black children gets hung for you being so stupid. They have all the same rights we have now a days so please you and your monkey children go die [Expletive] wanna be ass nigger
October 17, 2018	Act your race retard

All in violation of 18 U.S.C. § 2261A(2).

COUNT 6
18 U.S.C. § 1001(a)(2)

On or about May 29, 2018, in Anderson County, in the Eastern District of Kentucky, and elsewhere,

DYLAN LEE JARRELL

knowingly and willfully made a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the United States government, that is, by telling an agent of the Federal Bureau of Investigation that

he did not use and was not aware of the Reddit account “BigDaddy101-101-” and that he had not used the Reddit website in over a year, knowing full well that he had posted the communication set out in Count 1 in or about May 2018.

All in violation of 18 U.S.C. § 1001(a)(2).

COUNT 7
18 U.S.C. § 924(c)

Beginning on or about August 22, 2018, and continuing through on or about October 18, 2018, in Anderson County, in the Eastern District of Kentucky, and elsewhere,

DYLAN LEE JARRELL

in furtherance of the crimes set out in Counts 1, 2, and 3 of this Indictment, for which he may be prosecuted in a court of the United States, knowingly possessed a firearm, that is, an American Tactical Omni Maxx P3 Hybrid 5.56 caliber AR-15 rifle.

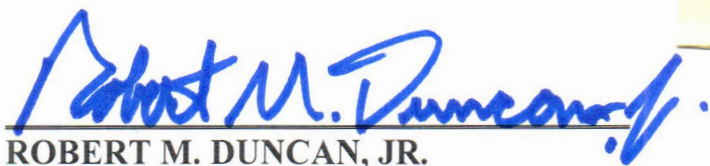
All in violation of 18 U.S.C. § 924(c)(1).

FORFEITURE ALLEGATIONS
18 U.S.C. § 924(d)
28 U.S.C. § 2461(c)

Upon conviction of the offense set forth in Count 7 of this Indictment, **DYLAN LEE JARRELL** shall forfeit to the United States of America, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in the commission of the offense, including, but not limited to: an American Tactical Omni Maxx P3 Hybrid 5.56 caliber AR-15 rifle, serial number NS150561, 120 rounds of 5.56 caliber ammunition, and 20 rounds of 5.56 caliber tracer ammunition.

All pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).

A TRUE BILL



Robert M. Duncan, Jr.

**ROBERT M. DUNCAN, JR.
UNITED STATES ATTORNEY**

PENALTIES

COUNTS 1-3: Imprisonment for not more than 5 years, fine of not more than \$250,000, and supervised release for not more than 3 years.

COUNTS 4-5: Imprisonment for not more than 5 years, fine of not more than \$250,000, and supervised release for not more than 3 years.

If in violation of a prior court order, pursuant to 18 U.S.C.

§ 2261(b)(6): Imprisonment for not less than 1 year and not more than 5 years, fine of not more than \$250,000, and supervised release for not more than 3 years.

COUNT 6: Imprisonment for not more than 5 years, fine of not more than \$250,000, and supervised release for not more than 3 years.

If involving domestic terrorism, as defined in 18 U.S.C. § 2331:

Imprisonment for not more than 8 years, fine of not more than \$250,000, and supervised release for not more than 3 years.

COUNT 7: Imprisonment for not less than 5 years to run consecutively to any other term of imprisonment imposed, fine of not more than \$250,000, and supervised release of not more than 5 years.

PLUS: Forfeiture of all listed property.

PLUS: Mandatory special assessment of \$100 per count.

PLUS: Restitution, if applicable.