

FILED

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

2019 SEP -5 PM 2: 31

CLERK US DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA FLORIDA

UNITED STATES OF AMERICA

v.

CASE NO. **0:19-cr-398-F33SPF**  
18 U.S.C. § 876(c)  
18 U.S.C. § 1038(a)(1)

MARIA BASSI LAURO

INDICTMENT

**SEALED**

The Grand Jury charges:

COUNT ONE  
**(Threats – Citrus Ridge Academy)**

On or about August 13, 2018, in the Middle District of Florida and elsewhere, the defendant,

MARIA BASSI LAURO,

did knowingly deposit in an authorized depository for mail matter, to be sent and delivered by the Postal Service, and caused to be delivered by the Postal Service according to the directions thereon, a communication addressed to an employee at Citrus Ridge Academy containing a threat to injure the addressee and the person of another, with the intent to communicate a true threat and with the knowledge that the communication would be viewed as a true threat.

In violation of 18 U.S.C. § 876(c).

**COUNT TWO**  
**(Biological Agent and Toxin Hoax – Citrus Ridge Academy)**

On or about August 13, 2018, in the Middle District of Florida and elsewhere, the defendant,

MARIA BASSI LAURO,

did engage in conduct with the intent to convey false and misleading information, under circumstances where such information may reasonably have been believed, and that indicated that an activity had taken, was taking, and would take place, that would constitute a violation of 18 U.S.C. § 2332a(a)(2)(A), that is, LAURO mailed an envelope addressed to an employee at Citrus Ridge Academy containing a powdery substance with the intent to convey false and misleading information that may reasonably have been believed to indicate that LAURO had used, was using, and threatened to use, any weapon involving a biological agent and toxin.

All in violation of 18 U.S.C. § 1038(a)(1) and (a)(1)(A).

**COUNT THREE**  
**(Threats – Groveland Elementary School)**

On or about September 24, 2018, in the Middle District of Florida and elsewhere, the defendant,

MARIA BASSI LAURO,

did knowingly deposit in an authorized depository for mail matter, to be sent and delivered by the Postal Service, and caused to be delivered by the Postal Service according to the directions thereon, a communication addressed to an employee at Groveland Elementary School containing a threat to injure the addressee and the person of another, with the intent to communicate a true threat and with the knowledge that the communication would be viewed as a true threat.

In violation of 18 U.S.C. § 876(c).

**COUNT FOUR**  
**(Biological Agent and Toxin Hoax – Groveland Elementary School)**

On or about September 24, 2018, in the Middle District of Florida and elsewhere, the defendant,

MARIA BASSI LAURO,

did engage in conduct with the intent to convey false and misleading information, under circumstances where such information may reasonably have been believed, and that indicated that an activity had taken, was taking, and would take place, that would constitute a violation of 18 U.S.C.

§ 2332a(a)(2)(A), that is, LAURO mailed an envelope addressed to an employee at Groveland Elementary School containing a powdery substance with the intent to convey false and misleading information that may reasonably have been believed to indicate that LAURO had used, was using, and threatened to use,

any weapon involving a biological agent and toxin.

All in violation of 18 U.S.C. § 1038(a)(1) and (a)(1)(A).

**COUNT FIVE**  
**(Threats – Four Corners Charter School)**

On or about September 28, 2018, in the Middle District of Florida and elsewhere, the defendant,

MARIA BASSI LAURO,

did knowingly deposit in an authorized depository for mail matter, to be sent and delivered by the Postal Service, and caused to be delivered by the Postal Service according to the directions thereon, a communication addressed to an employee at Four Corners Charter School containing a threat to injure the addressee and the person of another, with the intent to communicate a true threat and with the knowledge that the communication would be viewed as a true threat.

In violation of 18 U.S.C. § 876(c).

**COUNT SIX**  
**(Biological Agent and Toxin Hoax – Four Corners Charter School)**

On or about September 28, 2018, in the Middle District of Florida and elsewhere, the defendant,

MARIA BASSI LAURO,

did engage in conduct with the intent to convey false and misleading

information, under circumstances where such information may reasonably have been believed, and that indicated that an activity had taken, was taking, and would take place, that would constitute a violation of 18 U.S.C.

§ 2332a(a)(2)(A), that is, LAURO mailed an envelope addressed to an employee at Four Corners Charter School containing a powdery substance with the intent to convey false and misleading information that may reasonably have been believed to indicate that LAURO had used, was using, and threatened to use, any weapon involving a biological agent and toxin.

All in violation of 18 U.S.C. § 1038(a)(1) and (a)(1)(A).

A TRUE BILL,

  
\_\_\_\_\_  
Foreperson

MARIA CHAPA LOPEZ  
United States Attorney

By:

  
\_\_\_\_\_  
Daniel George  
Assistant United States Attorney

By:

  
\_\_\_\_\_  
Cherie L. Krigsman  
Assistant United States Attorney  
Chief, National Security and Cybercrime Section

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**UNITED STATES DISTRICT COURT**  
Middle District of Florida  
Tampa Division

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THE UNITED STATES OF AMERICA

vs.

MARIA BASSI LAURO

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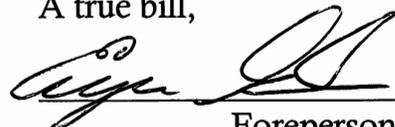
**INDICTMENT**

Violations: 18 U.S.C. § 876(c)  
18 U.S.C. § 1038(a)(1)

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A true bill,

  
\_\_\_\_\_  
Foreperson

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Filed in open court this 5th day  
of September, 2019.

\_\_\_\_\_  
Clerk

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Bail \$ \_\_\_\_\_

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