IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF FLORIDA PENSACOLA DIVISION

UNITED STATES OF AMERICA

V •		INDICTMENT
NOAH D. STIRN	/	3:19 ERLO/MCR

THE GRAND JURY CHARGES:

COUNT ONE

On or about April 23, 2019, in the Northern District of Florida and elsewhere, the defendant,

NOAH D. STIRN,

did knowingly cause to be delivered by the United States Postal Service, a communication to the United States District Court for the Southern District of Florida, containing a true threat to injure the person of another, with the intent that this communication be perceived as a true threat, by stating:

"There is an improvised explosive device inside of your building . . . This is an orchestrated attack in the name and for the cause of the Islamic State."

In violation of Title 18, United States Code, Section 876(c).

Returned in open court pursuant to Rule 6(f)

Type 18 2019

Date

United States Magistrate Judge

COUNT TWO

On or about April 23, 2019, in the Northern District of Florida and elsewhere, the defendant,

NOAH D. STIRN,

through the use of the mail, and in and affecting interstate or foreign commerce, did knowingly and willfully make a threat, concerning an attempt and alleged attempt, to kill, injure and intimidate any individual, and to damage and destroy a building, vehicle and other real and personal property by means of an explosive.

In violation of Title 18, United States Code, Section 844(e).

COUNT THREE

On or about May 6, 2019, in the Northern District of Florida and elsewhere, the defendant,

NOAH D. STIRN,

did knowingly cause to be delivered by the United States Postal Service, a communication to the United States District Court for the Southern District of Florida, containing a true threat to injure the person of another, with the intent that this communication be perceived as a true threat, by stating:

"There are bombs in the building . . . Some of this federal courthouse will explode when our I.S. cell detonates . . . Death to America, truly. This is an attack in the name of the Islamic State."

In violation of Title 18, United States Code, Section 876(c).

COUNT FOUR

On or about May 6, 2019, in the Northern District of Florida and elsewhere, the defendant,

NOAH D. STIRN,

through the use of the mail, and in and affecting interstate or foreign commerce, did knowingly and willfully make a threat, concerning an attempt and alleged attempt, to kill, injure and intimidate any individual, and to damage and destroy a building, vehicle and other real and personal property by means of an explosive.

In violation of Title 18, United States Code, Section 844(e).

COUNT FIVE

On or about May 7, 2019, in the Northern District of Florida and elsewhere, the defendant,

NOAH D. STIRN,

did knowingly cause to be delivered by the United States Postal Service, a communication to the United States District Court for the Northern District of Florida, containing a true threat to injure the person of another, with the intent that this communication be perceived as a true threat, by stating:

"... there is a bomb in the U.S. District Court ... This explosive device is TEXTER UNIBOX C4. Other combustible liquids are hidden as well, with something similar to a pipe bomb, in cooper encasing."

In violation of Title 18, United States Code, Section 876(c).

COUNT SIX

On or about May 7, 2019, in the Northern District of Florida and elsewhere, the defendant,

NOAH D. STIRN,

through the use of the mail, and in and affecting interstate or foreign commerce, did knowingly and willfully make a threat, concerning an attempt and alleged attempt, to kill, injure and intimidate any individual, and to damage and destroy a building, vehicle and other real and personal property by means of an explosive.

In violation of Title 18, United States Code, Section 844(e).

COUNT SEVEN

On or about May 13, 2019, in the Northern District of Florida and elsewhere, the defendant,

NOAH D. STIRN,

did knowingly cause to be delivered by the United States Postal Service, a communication to the United States Social Security Administration, containing a true threat to injure the person of another, with the intent that this communication be perceived as a true threat, by stating:

"There is very much explosive matterial in your building which we have intently, strategically, and jointly placed inside, in your offices and surrounding areas. The explosive matterial consists of TEXTER

UNIBOX C4, along with fertilizer which is combustible . . . This is a direct attack on the U.S. Government."

In violation of Title 18, United States Code, Section 876(c).

COUNT EIGHT

On or about May 13, 2019, in the Northern District of Florida and elsewhere, the defendant,

NOAH D. STIRN,

through the use of the mail, and in and affecting interstate or foreign commerce, did knowingly and willfully make a threat, concerning an attempt and alleged attempt, to kill, injure and intimidate any individual, and to damage and destroy a building, vehicle and other real and personal property by means of an explosive.

In violation of Title 18, United States Code, Section 844(e).

COUNT NINE

On or about May 14, 2019, in the Northern District of Florida and elsewhere, the defendant,

NOAH D. STIRN,

did knowingly cause to be delivered by the United States Postal Service, a communication to the United States Attorney's Office for the Northern District of Florida, containing a true threat to injure the person of another, with the intent that this communication be perceived as a true threat, by stating:

"... There is very much high grade explosive material inside your offices... These explosives consist of 3 cooper incased pipe bombs varying in size, and also of TEXTER UNIBOX C4, connected to a wired time detonation. There is also a car bomb attached to one of the prosecutors vehicles... This is a direct attack in the name of IS on the U.S. Government."

In violation of Title 18, United States Code, Section 876(c).

COUNT TEN

On or about May 14, 2019, in the Northern District of Florida and elsewhere, the defendant,

NOAH D. STIRN,

through the use of the mail, and in and affecting interstate or foreign commerce, did knowingly and willfully make a threat, concerning an attempt and alleged attempt, to kill, injure and intimidate any individual, and to damage and destroy a building, vehicle and other real and personal property by means of an explosive.

In violation of Title 18, United States Code, Section 844(e).

COUNT ELEVEN

On or about May 14, 2019, in the Northern District of Florida and elsewhere, the defendant,

NOAH D. STIRN,

did knowingly cause to be delivered by the United States Postal Service, a communication to the Florida Secretary of State, containing a true threat to injure

the person of another, with the intent that this communication be perceived as a true threat, by stating:

"There is very much explosive material in your building which we have intently, strategically, and jointly placed inside your offices and surrounding offices. This letter is of 100% unquestionable fact. The explosive material consists of 2 pressure sensitive, cooper incased pipe bombs, TEXTER UNIBOX C4... and a car bomb for the Secretary of State... Your terror, as I imagine, is well deserved."

In violation of Title 18, United States Code, Section 876(c).

COUNT TWELVE

On or about May 14, 2019, in the Northern District of Florida and elsewhere, the defendant,

NOAH D. STIRN,

through the use of the mail, and in and affecting interstate or foreign commerce, did knowingly and willfully make a threat, concerning an attempt and alleged attempt, to kill, injure and intimidate any individual, and to damage and destroy a building, vehicle and other real and personal property by means of an explosive.

In violation of Title 18, United States Code, Section 844(e).

A TRUE BILL:

Redacted per privacy policy

FOREPERSON

6-18-2019

DATE

LAWRENCE KEEFB

United States Attorney

DA VID L. GOLDBERG

Assistant United States Attorney

MICHELLE K. DAFFIN

Assistant United States Attorney