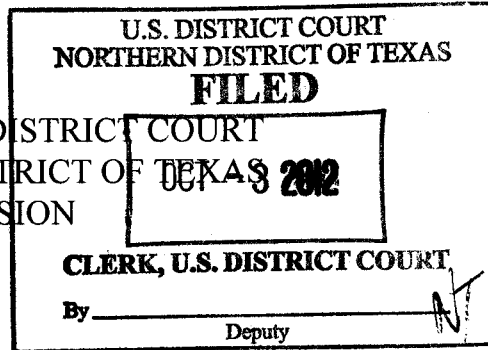


ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



UNITED STATES OF AMERICA

§
§
§
§
§

VS.

CRIMINAL NO.

BARRETT LANCASTER BROWN (1)

3. - 12CR - 317 - L

INDICTMENT

The Grand Jury charges:

INTRODUCTION

At all times material to this indictment, or as otherwise specified,

1. **Barrett Lancaster Brown** created Project PM in approximately 2010. Project PM was a IRC/wiki-based blogger network created to allow Brown and those he associated with to share information and achieve or pursue certain goals. **Barrett Lancaster Brown** used the website wiki.echelon2.org to operate Project PM.

2. On September 4, 2012, **Barrett Lancaster Brown** used his Twitter.com account BarrettBrownLOL, and posted the following comments:

- a. "Don't be a pussy. Call up every facist and tell them you're watching. <http://www.youtube.com/watch?v=4gcptY8ne14> ... #ProjectPM."
- b. "Have you doxed a pig today? Be ready for the #revolution - have a list informationliberation.com/?id=40815 #Anonymous."
- c. "Don't know how to shoot? You've got five years to learn. Maybe less. <http://www.youtube.com/watch?v=wkqSIZaBhUY&list=UUv1F1Z4TdveCyva7okPRmSA&index=1&feature=plcp> ... #Anonymous #ProjectPM #blackbloc."

- d. “#DHS stocking up on ammo. Are you?
<http://www.youtube.com/watch?v=wkqSIZaBhUY&list=UUv1FIZ4TdveCyva7okPRmSA&index=1&feature=plcp> ... Don't wait. Retaliate.”
- e. “Have a plan to kill every government you meet. #ProjectPM
tinychat.com/BarrettBrown #Anonymous Echelon2.org.”

3. On September 7, 2012, **Barrett Lancaster Brown** used his Twitter.com account **BarrettBrownLOL**, and posted the following comments:

- a. “Kids! Overthrow the US government lol
<https://www.youtube.com/watch?v=pHCdS7O248g> ...”
- b. “@Badger32d I've experienced other end of the gun, watching mom detained by U.S. armed thugs. See you on the streets!”
- c. “#ProjectPM - Everyone in #Anonymous with balls is either with us or awaiting trial. Don't wait. Retaliate.”

4. On September 7, 2012, **Barrett Lancaster Brown** used his Twitter.com account **BarrettBrownLOL**, and posted a message saying "Organize. Choose your pig. Make your move. Pastebin.com/HFxBIHv #ProjectPM #Anonymous #blackbloc #revolution.”

5. On September 8, 2012, **Barrett Lancaster Brown** used his Twitter.com account **BarrettBrownLOL**, and posted the following comments:

- a. “Democrats do not fear Republicans who fear no Democrat, but both will learn to fear anarchists now that net gives us revenge #ProjectPM.”
- b. “So now if I don't take my opiates I guess I get to feel 2 years of betrayal by country, loss of best kids in West to feds. Fuck you.”
- c. “Last outlet that ran my work, Guardian, no longer responding. Nothing restrains me now from finishing my real work #ProjectPM.”

- d. “Journalists allow the guilty to escape. #ProjectPM ensures the guilty will be known to their children as they are, forever.”
- e. “Help #ProjectPM plan, execute further attacks #PantherModerns tinychat.com/barrettbrown #Anonymous #Wikileaks <http://cryptome.org/2012/09/frey-chat-brown-02.htm> ...”
- f. “@_Dantalion No. I'd shoot you w/ my shotgun if you came near my home in Texas, where even I can legally kill ppl <https://www.youtube.com/watch?v=wkqSIZaBhUY&list=UUv1FIZ4TdveCyva7okPRmSA&index=2&feature=plcp> ...”
- g. “Not mad at you, mad at #FBI @AaronBarr which I've got taken care of now anyway lol e-mail hacks pastebin.com/12crnMjP.”

6. On September 10, 2012, **Barrett Lancaster Brown** used his Twitter.com account BarrettBrownLOL and posted the following comments:

- a. “#FBI Now you know I know. I get call from Agent [RS]¹ in 24 hrs, my laptops on plane to Dallas or I release in 25 #Anonymous.”

7. On September 10, 2012, **Barrett Lancaster Brown** used his Twitter.com account BarrettBrownLOL, and re-posted the message “A dead man can't leak stuff... Illegally shoot the son of a bitch.”

8. On September 11, 2012, **Barrett Lancaster Brown** used his Twitter.com account BarrettBrownLOL, and posted the following comments:

- a. “0 uploading now, dropping in 30 minutes #Anonymous #Wikileaks #ProjectPM #PantherModerns #FBI #Agent[RS].”
- b. “-1 [youtube.com/watch?v=klvPIX...](https://www.youtube.com/watch?v=klvPIX...) #Anonymous #ProjectPM #Wikileaks #FBI #PantherModerns #Agent[RS] #OffThePigs #Blackbloc.”

¹ Per local practice, the victim's name has been redacted from the Indictment. The redaction will appear as [RS].

- c. “@AsheraResearch My mother is being threatened with charges by #FBI due in part to your lies. Mention her again and see what happens.”
- d. “If what #HBGary did to me was legal, it will be just as legal when I do some of it to #Agent[RS].”
- e. “#ProjectPM backs up its claims, threats. Don't wait. Retaliate.
#OpClydeTolson #Anonymous #Wikileaks
[http://www.youtube.com/watch?v=klvP1Xx6OH4&feature=youtu.be ...](http://www.youtube.com/watch?v=klvP1Xx6OH4&feature=youtu.be)”
- f. “As I'll explain further tomorrow, I will regard any further armed raids as potential #Zeta assassination attempts and respond accordingly.”
- g. “#Agent[RS] claimed my warrants weren't public due to #Zeta threat. He knows it's serious and won't mind if I shoot any suspects.”
- h. “Threat to put my mom in prison last mistake #Agent[RS] will ever fucking make
[http://www.youtube.com/watch?v=klvP1Xx6OH4&feature=autoplay&list=UUv1FIZ4TdveCyva7okPRmSA&playnext=1 ...](http://www.youtube.com/watch?v=klvP1Xx6OH4&feature=autoplay&list=UUv1FIZ4TdveCyva7okPRmSA&playnext=1) #OpClydeTolson.”

9. On September 11, 2012, **Barrett Lancaster Brown** published a self made video on YouTube.com, entitled *Why FBI Agent [RS] Has Two Weeks To Send my Property Back, Part 1/3*.

10. On September 11, 2012, **Barrett Lancaster Brown** published a self made video on YouTube.com, entitled *FBI Ultimatum Pt 2*. In the video, Brown stated:

- a. “[T]his is part two of a two part series of why I’m fucking angry.”
- b. “From now on I am a bad guy, and I’m going to prove that in the coming months, using the court system, using the media, using my group ProjectPM, which has always been secretly to some extent created for the purpose of wiping out this fucking government and certain media institutions, and through other means at my disposal, some of which are known, some of which are known to a few, and some of which are still secret. . . . I want everyone to know the

demand I am making to the FBI today, which is that I will have my stuff returned to me in two weeks.”

- c. “They have two weeks to get send it all back, and twenty-four hours from now I will receive a call from [RS] himself, apologizing for what happened.”

11. On September 11, 2012, after **Barrett Lancaster Brown** published the two videos on YouTube.com, he used his Twitter.com account BarrettBrownLOL, and stated “[d]one for the day, see part 3 of #OpClydeTolson tomorrow. Send me info on #Agent[RS] - use @AaronBarr ethics re: family members.”

12. On September 12, 2012, **Barrett Lancaster Brown** published a self made video on YouTube.com, entitled *Why I'm Going to Destroy FBI Agent [RS] Part Three: Revenge of the Lithe*. In the video:

- a. **Brown** called FBI Special Agent [RS] a “fucking chicken shit little faggot cocksucker” and indicated that “we are investigating [him] now.”
- b. **Brown** called FBI Special Agent [RS] “a criminal, who is involved in a criminal conspiracy.”
- c. **Brown** stated “[t]hat’s why [RS]’s life is over, but when I say his life is over, I don’t say I’m going to kill him, but I am going to ruin his life and look into his fucking kids.”
- d. **Brown** stated “[a]ny armed officials of the US government, particularly the FBI, will be regarded as potential Zeta assassin squads, and as the FBI and DPD know . . . I’m armed, that I come from a military family, that I was taught to shoot by a Vietnam vet and by my father a master hunter . . . I will shoot all of them and kill them if they come.”
- e. **Brown** stated “[a]nd frankly, you know, it was pretty obvious I was

going to be dead before I was forty or so, so, I wouldn't mind going out with two FBI sidearms like a fucking Egyptian Pharaoh. Adios”

13. When **Barrett Lancaster Brown** published the video *Why I'm Going to Destroy FBI Agent [RS] Part Three: Revenge of the Lithe* on September 12, 2012, he inserted a comment on YouTube.com requesting other persons to “[s]end all info on Agent [RS] to barriticus@gmail.com so FBI can watch me look up his kids.”

COUNT ONE
Internet Threats
18 U.S.C. § 875(c)

The Grand Jury hereby adopts, realleges, and incorporates by reference all of the allegations in the Introduction of this Indictment.

From on or after March 6, 2012, through and including on or about September 12, 2012, in the Dallas Division of the Northern District of Texas, the defendant **Barrett Lancaster Brown**, knowingly and willfully did transmit in interstate and foreign commerce communications containing threats to injure the person of another, that being, **Barrett Lancaster Brown** transmitted messages through the Internet on his Twitter.com account and his YouTube.com account, threatening to shoot and injure agents of the Federal Bureau of Investigation, and specifically focusing on Federal Bureau of Investigation Special Agent [RS].

In violation of 18 U.S.C. § 875(c).

COUNT TWO
Conspiracy to Make Publically Available
Restricted Personal Information
of an Employee of the United States
18 U.S.C. § 371 (18 U.S.C. § 119)

The Grand Jury hereby adopts, realleges, and incorporates by reference all of the allegations in the Introduction of this Indictment.

Between on or about March 5, 2012 through on or about September 12, 2012, in the Dallas Division of the Northern District of Texas, the defendant **Barrett Lancaster Brown**, knowingly and willfully did combine, conspire, confederate, and agree with other persons known and unknown to the grand jury, to commit an offense against the United States, to wit: to make restricted personal information about Federal Bureau of Investigation Special Agent [RS] and his immediate family publically available with the intent to threaten and intimidate the Special Agent and to incite the commission of a crime of violence against the Special Agent in violation of 18 U.S.C. § 119, in that in September 2012 in the Northern District of Texas, **Barrett Lancaster Brown** requested another person known to the grand jury to assist him find on the Internet restricted information about Federal Bureau of Investigation Special Agent [RS] and [RS]'s family, and that other person agreed to do so, and furthermore, the other person did conduct a search on the Internet for the restricted information.

In violation of 18 U.S.C. § 371 (18 U.S.C. § 119).

COUNT THREE

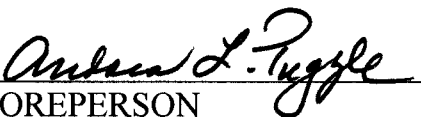
Retaliation Against a Federal Law Enforcement Officer
(18 U.S.C. §§115(a)(1)(B) and (b)(4))

The Grand Jury hereby adopts, realleges and incorporates by reference all of the allegations in the Introduction of this Indictment.

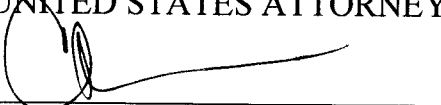
Between on or about March 5, 2012 through on or about September 12, 2012, in the Dallas Division of the Northern District of Texas, the defendant **Barrett Lancaster Brown**, did knowingly and willfully threaten to assault a Federal Law enforcement officer, with the intent to impede, intimidate, and interfere with such Federal Law enforcement officer while engaged in the performance of official duties, and with the intent to retaliate against such Federal Law enforcement officer on account of the performance of official duties.

In violation of 18 U.S.C. §§ 115(a)(1)(B) and (b)(4).

A TRUE BILL:


FOREPERSON

SARAH R. SALDAÑA
UNITED STATES ATTORNEY



CANDINA S. HEATH
Assistant United States Attorney
State of Texas Bar No. 09347450
1100 Commerce Street, 3rd Floor
Dallas, Texas 75242
Telephone: 214.659.8600
candina.heath@usdoj.gov

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

THE UNITED STATES OF AMERICA

v.

BARRETT LANCASTER BROWN

INDICTMENT

18 U.S.C. § 875(c)
Internet Threats

18 U.S.C. § 371 (18 U.S.C. § 119)
Conspiracy to Make Publically Available Restricted Personal Information of an Employee
of the United States

18 U.S.C. §§115(a)(1)(B) and (b)(4)
Retaliation Against a Federal Law Enforcement Officer

3 Counts

A true bill rendered

Andrew L. Pugh

DALLAS

FOREPERSON

Filed in open court this _____ day of October 2012

Clerk

Defendant already in Federal Custody since 9/13/12 at Mansfield

UNITED STATES ~~DISTRICT~~ MAGISTRATE JUDGE

Magistrate Case pending 3:12-MJ-405

Ann Cavilla Rung
10/3/12

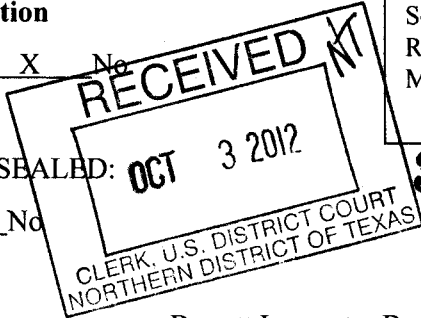
**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS**

RELATED CASE INFORMATION	
Superseding Indictment/Information:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
New Defendant:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Pending CR Case in NDTX:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If Yes, Number:	_____
Search Warrant Case Number:	<u>3:12-MJ-406</u>
Rule 20 from District of	_____
Magistrate Case Number	<u>3:12-MJ-405</u>

1. Defendant Information

Juvenile: Yes No

If Yes, Matter to be SEALED: Yes No



3 - 12CR - 317 - L

Defendant Name Barrett Lancaster Brown

Alias Name _____

Address 3230 North Hall Street, Apartment 249, Dallas, Texas

County in which offense was committed: Dallas

2. U.S. Attorney Information

Candina S. Heath Bar #: TX 09347450

3. Interpreter

Yes No If Yes, list language and/or dialect: _____

4. Location Status

Already in Federal Custody as of 9/13/2012 at Mansfield
 Already in State Custody
 On Pretrial Release

5. U.S.C. Citations

Total # of Counts as to This Defendant: **3** Petty _____ Misdemeanor _____ Felony

Citation	Description of Offense Charged	Count(s)
18 U.S.C. § 875(c)	Internet Threats	1
18 U.S.C. § 371 (18 U.S.C. § 119)	Conspiracy to Make Publicly Available Restricted Personal Information of an Employee of the United States	2
18 U.S.C. §§115(a)(1)(B) and (b)(4)	Retaliation Against a Federal Law Enforcement Officer	3

Date 10-1-2012

Signature of AUSA: _____

CANDINA S. HEATH