

The Honorable John C. Coughenour

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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

CAMERON SHEA,

Defendant.

NO. CR20-032JCC

**GOVERNMENT’S SENTENCING
MEMORANDUM**

The United States of America, by and through Tessa M. Gorman, Acting United States Attorney for the Western District of Washington, and Thomas M. Woods, Assistant United States Attorney for said District, respectfully submits this memorandum in connection with Cameron Shea’s upcoming sentencing.

INTRODUCTION

Shea was one of the two leaders of a plot to target journalists and activists, particularly those who were Jews and other minorities. In the middle of the night, the members of the plot affixed to the victims’ homes frightening posters that included threats of violence. Some of the posters were also mailed to the individuals at their homes. As one co-conspirator put it, the plot was designed to “*have them all wake up one morning and find themselves terrorized by targeted propaganda.*”


1 In addition to introducing the plot, and helping to organize it, Shea mailed letters
2 to two persons affiliated with the Anti-Defamation League and a news journalist. Shea's
3 conduct, however, extended beyond the mere actions that he carried out. He participated
4 in the conspiracy with enthusiasm. He cheered on other participants, and encouraged
5 them to identify additional victims to target. He recruited members for Atomwaffen.
6 And he repeatedly encouraged and glorified hate.

7 Shea stands in sharp contrast to the other two defendants to appear before this
8 Court. His conduct is far more egregious than Johnny Garza, who the Court sentenced to
9 16 months, or Taylor Parker-Dipeppe, who was sentenced to time served. Neither Garza
10 nor Parker-Dipeppe were leaders or organizers—they were each responsible for a single
11 poster. Moreover, Shea lacks the extraordinary personal circumstances that Parker-
12 Dieppepe presented.

13 For these reasons, and as further set forth below, the government believes that a
14 sentence at the low end of the advisory Guidelines range, 51 months, is appropriate.

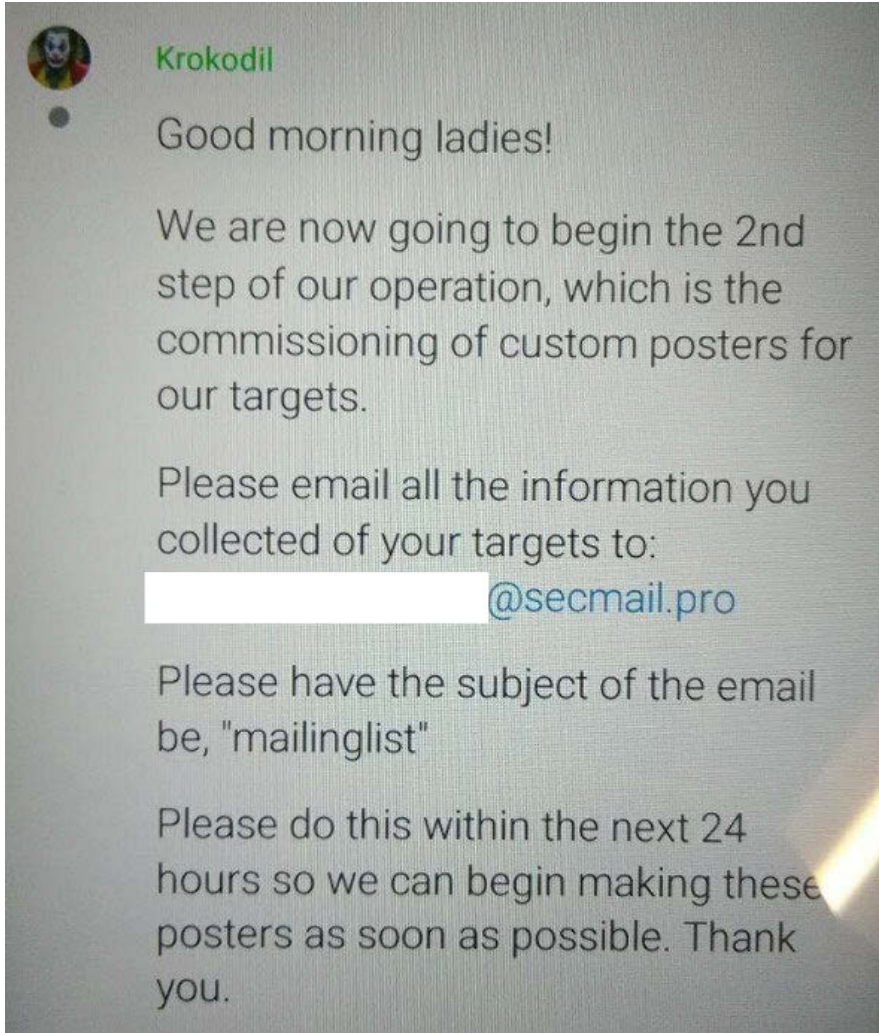
15 **BACKGROUND**

16 In November 2019, Cameron Shea, using the moniker Krokodil, launched
17 Operation Erste Säule. Shea was a member of Atomwaffen Division (“AWD”), a white
18 supremacist group that has been responsible for several acts of violence, and for
19 promoting hate against Jews and other minorities. Shea invited fellow AWD members to
20 this chat group to collaborate and coordinate an effort to deliver threatening messages to
21 journalists' homes and other places. *Id.* Shea described the operation as such:

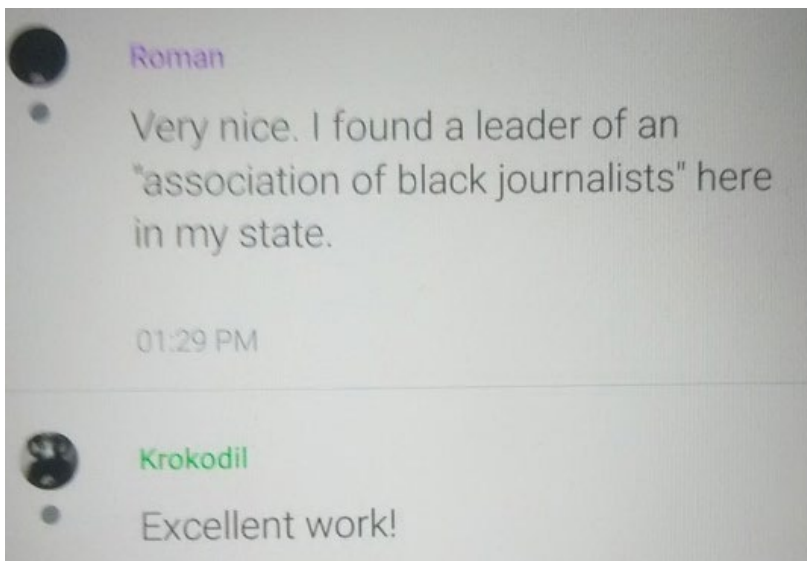
1  **Krokodil**
2
3 Also, I wanted to run this by you:
4 we're coordinating this nation wide
5 operation called Operation Erste
6 Säule, named after the first pillar of
7 stat power, AKA the media. We will be
8 posterizing journalists houses and
9 media buildings to send a clear
10 message that we too have leverage
11 over them, and that we aren't scared
12 of their articles or public defamation.
13
14 The goal, of course, is to erode the
15 media/states air of legitimacy by
16 showing people they have names
17 and addresses, and hopefully
18 embolden others to act as well. Do
19 you have anyone in the East Coast
20 Alumni who would be willing to
21 partake?
22

23
24 As part of the operation, each participant was directed to identify, research, and
25 locate journalists in their area. She coordinated with Kaleb Cole to collect addresses
26 from AWD members, directing members to send victim information to an encrypted
27 email address:
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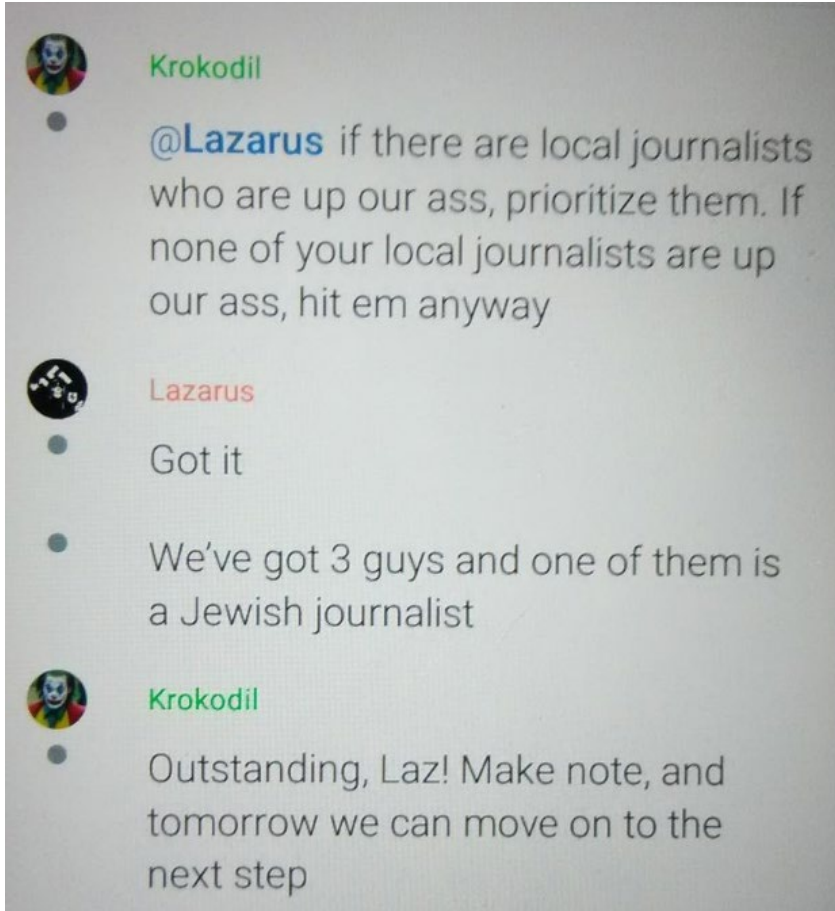
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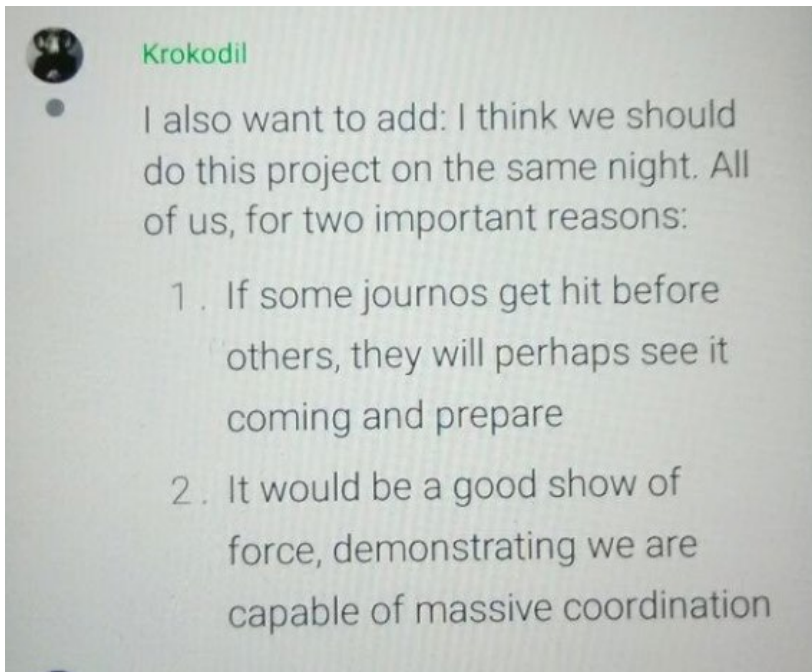
Shea cheered on members and encouraged them to participate:



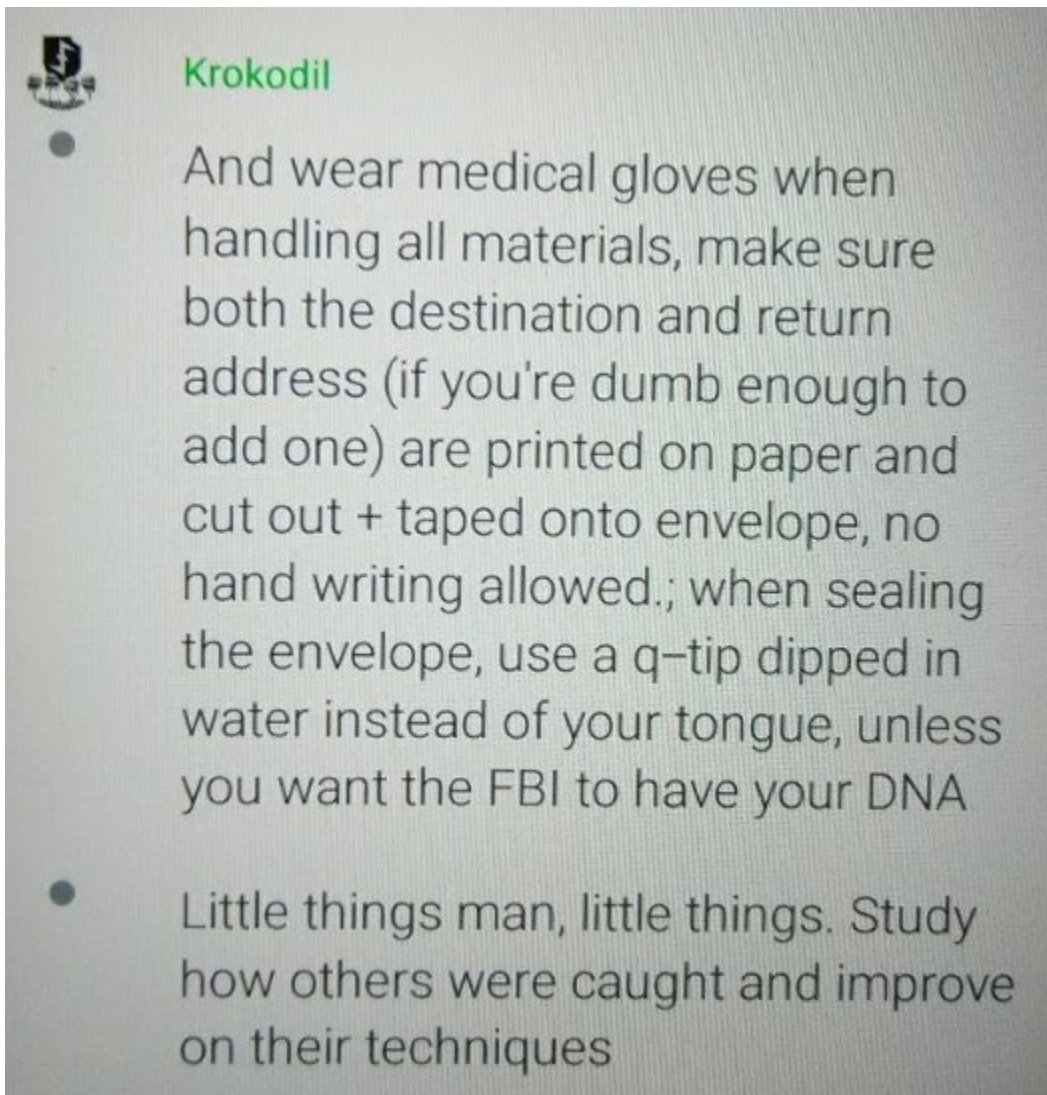
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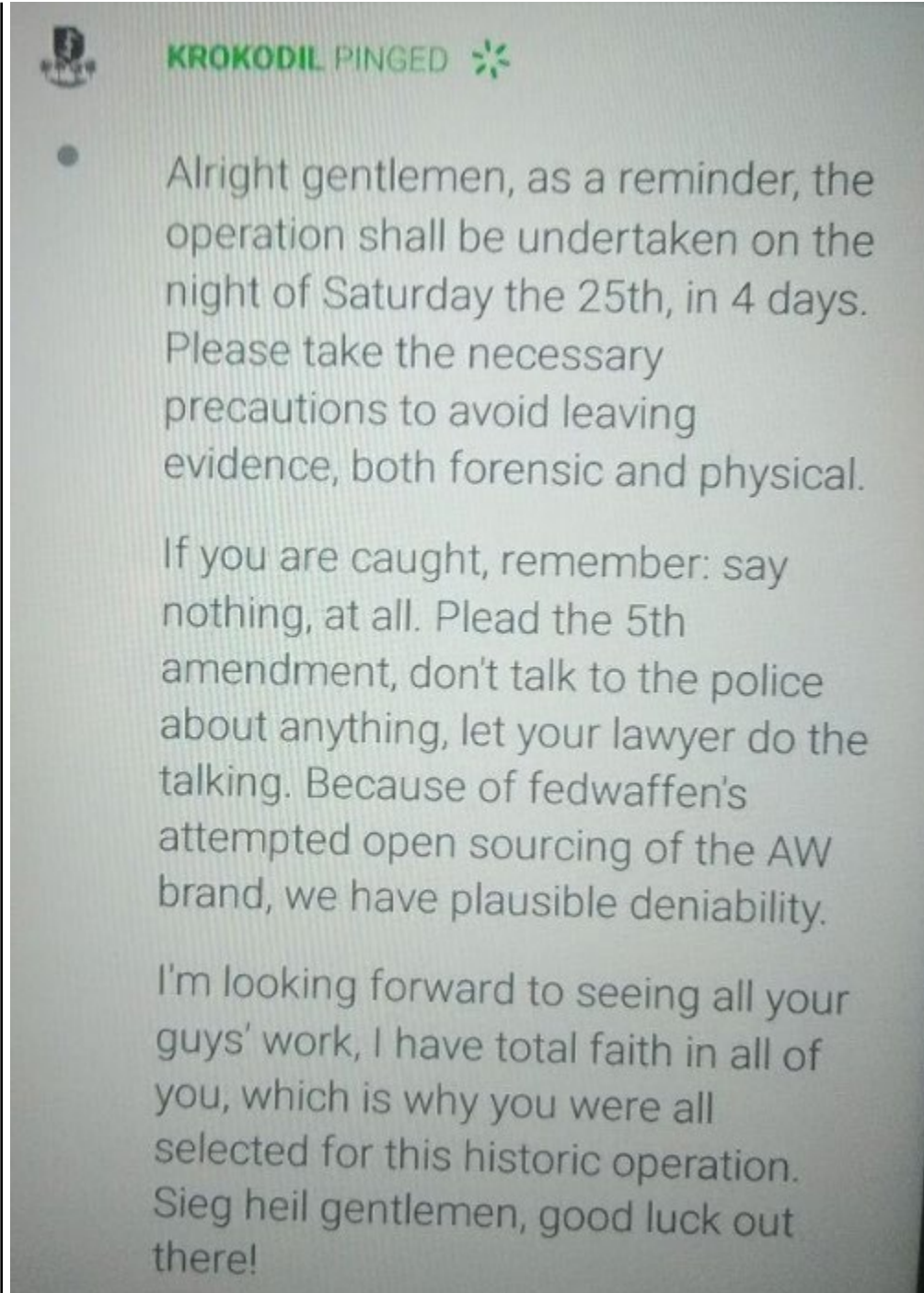
Shea encouraged the group to implement the operation on a single night, stating:



1 Shea encouraged members to take steps to avoid being caught by law
2 enforcement. He advised the group:



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22 He further advised the group:



25 In late January, Shea mailed letters to two people associated with the Anti-
26 Defamation League, and a news reporter who had reported on AWD. The letters each
27 contained one of the following posters:
28

1 WE ARE
2 WATCHING
3 WE ARE NO ONE
4 WE ARE
5 EVERYONE
6 WE KNOW
7 WHERE YOU LIVE
8 DO NOT FUCK WITH US



9 [Redacted]

10 YOU HAVE BEEN VISITED BY YOUR LOCAL NAZIS

TWO CAN PLAY AT THIS GAME



THESE PEOPLE HAVE NAMES AND ADDRESSES



11 [Redacted]

12 YOU HAVE BEEN VISITED BY YOUR LOCAL NAZIS

13 YOUR ACTIONS
14 HAVE CONSEQUENCES



15 OUR PATIENCE
16 HAS ITS LIMITS



17 [Redacted]

18 YOU HAVE BEEN VISITED BY YOUR LOCAL NAZIS

19 The bottom portion of the posters contained the victims' personal information,
20 which was designed to further frighten and threaten the victims. In addition, co-
21 conspirators delivered posters to victims in Florida and Arizona as well.

22 **PLEA AGREEMENT**

23 Shea pleaded guilty in a timely fashion to Count 1 of the Superseding Indictment,
24 which charges him with Conspiracy to Mail Threatening Communications, to Commit
25 Cyberstalking, and to Interfere with Federally Protected Activities, in violation of Title

1 18, United States Code, Section 371. Shea also pleaded guilty to Count 5, which charged
 2 him with a substantive count of Interfering with Federally Protected Activities, in
 3 violation of Title 18, United States Code, Section 245. The plea agreement contains no
 4 agreements as to the Sentencing Guidelines or sentencing recommendations. The plea
 5 agreement also does not contain a waiver of appeal.

SENTENCING GUIDELINES

7 There does not appear to be any dispute as to the Sentencing Guidelines. The total
 8 offense level scores as follows:

9 Base (2A6.2)	18
10 Threatened use of a dangerous weapon, 11 <i>i.e.</i> , a Molotov cocktail (2A6.2(b)(1))	+2
12 Hate crime motivation (3A1.1)	+3
13 Organizer of five or more individuals (3B1.1)	+4
14 Acceptance of responsibility	-3
15 Total:	24

17 Shea does not have any criminal history, and thus is category I. His range is
 18 therefore 51-63 months.

SECTION 3553 ANALYSIS

20 Shea deliberately targeted Jews and other minorities, along with reporters, with the
 21 goal of instilling fear. Shea did not simply “mail posters.” Rather, the defendant wanted
 22 the victims to feel unsafe in their own homes. The defendant exploited the fear that many
 23 Jews, Blacks, and other minorities feel. The defendant knew that the victims of this plot
 24 did not have the liberty of treating the posters as an empty threat—not when the news is
 25 full of horrible event after event, whether it be the Pittsburgh synagogue shooting, the El
 26 Paso Walmart rampage, or the Charleston church massacre. And that fear was not
 27 limited to the specific individuals and their families who received posters. As Shea well
 28 knew, it was felt by their fellow community members, both locally and nationally.


1 In addition, Shea repeatedly displayed enthusiasm for hate. When someone posted
2 about a mass shooting at a synagogue, and that only one person died, Shea replied that it
3 was “better than nothing:”



12
13 Synagogue shooting kills 1,
14 wounds 3 during Jewish holiday


15 apnews.com/36c8a77...8ca1ef78e0b90ac2c1

16
17 07:30 PM · 23:15 remaining



18  Krokodil

19
20 Meh tier assault, but better than
21 nothing

22 When an AWD member said that he had postered bus shelters, Shea expressed
23 encouragement for making people fearful:

1 I hit a ton of bus-stop shelters
2
3 None of them are there, so, job well
4 done!
5
6 Unfortunately flyering doesn't do too
7 much more than give media
8 something to use to make money
9
10
11 And let people know that the
12 boogieman is still under the bed
13
14  Krokodil
15
16 Well, letting them know the
17 boogieman is still there is important
18

19 And he relished a leadership role in the organization, helping to recruit members:

20
21  Krokodil
22 Do we have any cells in or near Tennessee?
23 Interviewing a prospect here
24  8:06 PM
25

26 The government acknowledges that Shea's upbringing was traumatic, and that he
27 undoubtedly sought misplaced companionship online. The government also
28

1 acknowledges that Shea, through his counsel, renounced AWD early in this case, and that
2 he promptly pleaded guilty, accepting responsibility for his actions.

3 However, in light of the very serious nature of his conduct, and the fact that this
4 type of crime has enormous effects, particularly in the current environment, the
5 government believes that a Guidelines sentence of 51 months is warranted, to be followed
6 by three years of supervised release.

7
8 Dated this 17th day of August, 2021.

9 Respectfully submitted,

10 TESSA M. GORMAN
11 Acting United States Attorney

12 *s/ Thomas M. Woods*
13 THOMAS M. WOODS
14 Assistant United States Attorney
15 United States Attorney's Office
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17 Seattle, Washington 98101-3903