

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
FILED

2020 FEB -4 P 12:16
UNITED STATES OF AMERICA,

CLERK OF COURT
Plaintiff,

20-CR-02

Case No. _____
[18 U.S.C. §§ 241]

v.

YOUSEF O. BARASNEH,

Defendant.

INDICTMENT

COUNT ONE

(Conspiracy Against Rights)

THE GRAND JURY CHARGES THAT:

1. At all times material to this indictment, Yousef O. Barasneh was a member of "The Base," a white-supremacist group.
2. At all times material to this indictment, the Beth Israel Sinai Congregation was an organization consisting of Jewish members and guests who worshiped and conducted other religious activities in a building located at 3009 Washington Avenue, Racine, Wisconsin, which served as a synagogue.
3. From on or about September 15, 2019, and continuing through on or about September 23, 2019, in the State and Eastern District of Wisconsin and elsewhere,

YOUSEF O. BARASNEH

knowingly and willfully conspired and agreed with other persons known and unknown to the grand jury, to injure, oppress, threaten, and intimidate non-white

and Jewish citizens of the United States in the free exercise and enjoyment of the right secured by the Constitution and laws of the United States, to hold and use real and personal property in the same manner as that right is enjoyed by white citizens, as guaranteed by Title 42, United States Code, Section 1982.

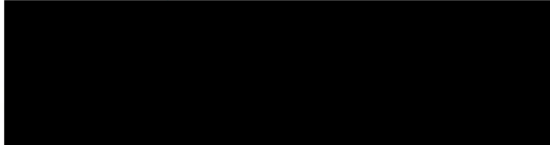
4. It was a plan and purpose of the conspiracy that Barasneh and his co-conspirators take action against property associated with non-white and Jewish citizens to show the strength and cohesion of "The Base."

5. In furtherance of the conspiracy, Barasneh and his co-conspirators used a messaging platform through which they discussed vandalizing property associated with African Americans and Jewish Americans and agreed that they should take action between September 20, 2019, and September 25, 2019, to vandalize such property.

6. In furtherance of the conspiracy, on or about September 21, 2019, Barasneh spray-painted anti-Semitic symbols and language on the Beth Israel Sinai Congregation building in Racine, Wisconsin.

All in violation of Title 18, United States Code, Section 241.

A TRUE BILL:



FOREPERSON

Dated: February 4, 2020

A handwritten signature in blue ink, appearing to read "Matthew D. Krueger".

MATTHEW D. KRUEGER
United States Attorney