

Eastern District of Kentucky
FILED

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY
NORTHERN DIVISION
COVINGTON**

SEP 08 2016

AT COVINGTON
ROBERT R. CARR
CLERK U.S. DISTRICT COURT

THE GRAND JURY CHARGES:

Indictment No. 16-33-ART-CJS

**COUNT 1
18 U.S.C. §§ 875(c) and 2**

On or about October 19, 2015, in Mason County, in the Eastern District of Kentucky,

MARIE ANTOINETTE CASTELLI,

aiding and abetting others, did knowingly transmit in interstate and foreign commerce via the Internet, communications intended to be a threat to injure the person of another, that is, communications containing the names and addresses of Victims 1, 2 and 3, and including a link to a publically-viewable document on the Internet that described Victims 1, 2 and 3 and their families, displayed their photographs, and stated that others should locate and execute Victim 1, all in violation of 18 U.S.C. §§ 875(c) and 2.

**COUNT 2
18 U.S.C. § 1001(a)(2)**

On or about April 15, 2016, in Mason County, in the Eastern District of Kentucky,

MARIE ANTOINETTE CASTELLI

did willfully and knowingly make materially false, fictitious, and fraudulent statements and representations in a matter involving terrorism within the jurisdiction of the executive branch of the Government of the United States, that is, when asked by a

Special Agent of the Federal Bureau of Investigation whether she possessed any other phones, **CASTELLI** falsely replied that she did not, or words to that effect, then and there knowing the statements and representations were false because she possessed two additional phones at that time, all in violation of 18 U.S.C. § 1001(a)(2).

A TRUE BILL


KERRY B. HARVEY
UNITED STATES ATTORNEY

PENALTIES

COUNT 1: Not more than five years of imprisonment, a fine of up to \$250,000, and not more than three years of supervised release.

COUNT 2: Not more than eight years of imprisonment, a fine of up to \$250,000, and not more than three years of supervised release.

PLUS: Restitution, if applicable.

PLUS: Mandatory special assessment of \$100 per felony count.