

Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington.

March 4 20 20
WILLIAM M. McCOOL, Clerk
By *[Signature]* Deputy

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

UNITED STATES OF AMERICA,
Plaintiff,

v.

CAMERON BRANDON SHEA,
KALEB J. COLE,
TAYLOR ASHLEY PARKER-DIPEPPE,
JOHNNY ROMAN GARZA,
Defendants.

CR20-032 JCC

INDICTMENT

The Grand Jury charges that:

COUNT 1
(Conspiracy to Mail Threatening Communications and to Commit Cyberstalking)

Beginning at a time unknown, but not later than November 2019, and continuing until on or about February 26, 2020, at King County, within the Western District of Washington, and elsewhere, CAMERON BRANDON SHEA, KALEB J. COLE, TAYLOR ASHLEY PARKER-DIPEPPE, and JOHNNY ROMAN GARZA, along with others known and unknown, did knowingly and willfully conspire, combine, confederate, and agree to commit offenses against the United States, to wit: Mailing Threatening

1 Communications, in violation of Title 18, United States Code, Section 876(c) and
2 Cyberstalking, in violation of Title 18, United States Code, Section 2261A.

3 **A. Object of the Conspiracy**

4 1. The object of the conspiracy was for CAMERON BRANDON SHEA,
5 KALEB J. COLE, TAYLOR ASHLEY PARKER-DIPEPPE, and JOHNNY ROMAN
6 GARZA to threaten journalists and activists, particularly Jews and other minorities, with
7 the intent to cause fear of bodily harm, harass, intimidate, and retaliate against
8 unfavorable reporting.

9 **B. Manner and Means of the Conspiracy**

10 2. It was part of the conspiracy that KALEB J. COLE and CAMERON
11 BRANDON SHEA helped to create threatening posters, which included a poster of a
12 person in a skull mask holding a Molotov cocktail in front of a house, another depicting
13 people in skull masks holding guns with the message “These People Have Names and
14 Addresses,” and another littered with swastikas with the message, “We Know Where You
15 Live.” All three posters contained a place for the recipient’s personal information,
16 including their home address.

17 3. It was part of the conspiracy that CAMERON BRANDON SHEA, KALEB
18 J. COLE, TAYLOR ASHLEY PARKER-DIPEPPE, and JOHNNY ROMAN GARZA
19 conducted research online to identify journalists and activists to threaten, specifically
20 targeting Jews and other minorities.

21 4. It was part of the conspiracy that CAMERON BRANDON SHEA, KALEB
22 J. COLE, TAYLOR ASHLEY PARKER-DIPEPPE, and JOHNNY ROMAN GARZA
23 compiled the home addresses and other personal information for the above-mentioned
24 journalists and activists, using online sources.

25 5. It was part of the conspiracy that CAMERON BRANDON SHEA, KALEB
26 J. COLE, TAYLOR ASHLEY PARKER-DIPEPPE, and JOHNNY ROMAN GARZA
27 planned and plotted to threaten the above-mentioned journalists and activists through
28 online communications among themselves and others.

1 6. It was part of the conspiracy that CAMERON BRANDON SHEA, KALEB
2 J. COLE, TAYLOR ASHLEY PARKER-DIPEPPE, and JOHNNY ROMAN GARZA
3 agreed to mail the threatening posters to the journalists and activists, and to affix the
4 posters on their residences.

5 7. It was part of the conspiracy that CAMERON BRANDON SHEA, KALEB
6 J. COLE, TAYLOR ASHLEY PARKER-DIPEPPE, and JOHNNY ROMAN GARZA
7 took steps to hide and conceal their actions, including using an encrypted chat service and
8 wearing disguises during the operation.

9 **C. Overt Acts**

10 8. During and in furtherance of the conspiracy, at King County, within the
11 Western District of Washington, and elsewhere, one or more of the conspirators
12 committed one or more of the following overt acts, among others:

13 a. In December 2019, KALEB J. COLE helped create a collection of
14 threatening posters that were designed to threaten bodily harm, intimidate, harass, and
15 retaliate against reporters and activists, particularly Jews and other minorities.

16 b. On or about January 25, 2020, CAMERON BRANDON SHEA
17 purchased stamps and packaging tape, and mailed threatening posters to a reporter and
18 two individuals associated with the Anti-Defamation League.

19 c. On January 25, 2020, TAYLOR ASHLEY PARKER-DIPEPPE
20 affixed a threatening poster on a residence that he believed belonged to a journalist.

21 d. On or about January 25, 2020, JOHNNY ROMAN GARZA and
22 another individual affixed a threatening poster on the home of an editor of a local Jewish
23 publication.

24 All in violation of Title 18, United States Code, Section 371.
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COUNT 2

(Mailing Threatening Communications)

On or about January 25, 2020, at King County, within the Western District of Washington, and elsewhere, CAMERON BRANDON SHEA, KALEB J. COLE, TAYLOR ASHLEY PARKER-DIPEPPE, and JOHNNY ROMAN GARZA knowingly and willfully did deposit in an authorized depository for mail matter, to be sent and delivered by the Postal Service, and knowingly caused to be delivered by the Postal Service according to the directions thereon, a communication, addressed to Victim #1, a news reporter, and containing a threat to injure Victim #1.

It is further alleged that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

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

COUNT 3

(Mailing Threatening Communications)

On or about January 25, 2020, at King County, within the Western District of Washington, and elsewhere, CAMERON BRANDON SHEA, KALEB J. COLE, TAYLOR ASHLEY PARKER-DIPEPPE, and JOHNNY ROMAN GARZA knowingly and willfully did deposit in an authorized depository for mail matter, to be sent and delivered by the Postal Service, and knowingly caused to be delivered by the Postal Service according to the directions thereon, a communication, addressed to Victim #2, a person associated with the Anti-Defamation League, and containing a threat to injure Victim #2.

It is further alleged that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

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

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COUNT 4
(Mailing Threatening Communications)

On or about January 25, 2020, at King County, within the Western District of Washington, and elsewhere, CAMERON BRANDON SHEA, KALEB J. COLE, TAYLOR ASHLEY PARKER-DIPEPPE, and JOHNNY ROMAN GARZA knowingly and willfully did deposit in an authorized depository for mail matter, to be sent and delivered by the Postal Service, and knowingly caused to be delivered by the Postal Service according to the directions thereon, a communication, addressed to Victim #3, a person associated with the Anti-Defamation League, and containing a threat to injure Victim #3.

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1 It is further alleged that this offense was committed during and in furtherance of
2 the conspiracy charged in Count 1, above.

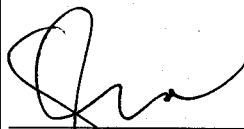
3 All in violation of Title 18, United States Code, Section 876(c).
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7 A TRUE BILL:

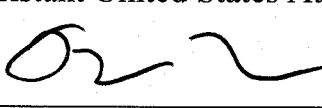
8 DATED: March 4, 2020
9

10 (Signature of Foreperson redacted pursuant to
11 the policy of the Judicial Conference of the
12 United States)

13 FOREPERSON

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15 _____
16 BRIAN T. MORAN
17 United States Attorney

18 
19 _____
20 TODD GREENBERG
21 Assistant United States Attorney

22 
23 _____
24 THOMAS M. WOODS
25 Assistant United States Attorney
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27
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