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**UNITED STATES DISTRICT COURT**

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**District of Kansas**  
(TOPEKA DOCKET)

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**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**Case No. 19- 40091 - DDC**

**JARRETT WILLIAM SMITH,**

**Defendant.**

**INDICTMENT**

**THE GRAND JURY CHARGES:**

**COUNT 1**

**(Distributing Explosives Information)**

On or about September 20, 2019, in the District of Kansas and elsewhere within the jurisdiction of the Court, the defendant,

**JARRETT WILLIAM SMITH,**

knowingly and unlawfully distributed by any means information pertaining to, in whole and in part, the manufacture and use of an explosive, destructive device, and a weapon of mass destruction, namely detailed six-step instructions for constructing an explosive device, with the intent that the information be used for, and in furtherance of an activity that constitutes a federal crime of violence, including violations of 18 U.S.C. § 2332a (use or attempt to use a weapon of mass destruction).

All in violation of Title 18, United States Code, Sections 2 and 842(p)(2)(A).

**COUNT 2**

**(Distributing Explosives Information)**

On or about September 20, 2019, in the District of Kansas and elsewhere within the jurisdiction of the Court, the defendant,

**JARRETT WILLIAM SMITH,**

knowingly and unlawfully distributed by any means information pertaining to, in whole and in part, the manufacture and use of an explosive, destructive device, and a weapon of mass destruction, namely a recipe for improvised napalm, with the intent that the information be used for, and in furtherance of an activity that constitutes a federal crime of violence, including violations of 18 U.S.C. § 2332a (use or attempt to use a weapon of mass destruction).

All in violation of Title 18, United States Code, Sections 2 and 842(p)(2)(A).

**COUNT 3**

**(Threatening Interstate Communication)**

On or about September 20, 2019, in the District of Kansas and elsewhere within the jurisdiction of the Court, the defendant,

**JARRETT WILLIAM SMITH,**

knowingly and willfully transmitted in interstate and foreign commerce from the State of Kansas to the State of Michigan, a communication describing a plan to attack a specific home and recommending a specific product or device to use in gaining entry to that home, and the communication contained a threat to injure D.H. (whose identity is known to the Grand Jury), specifically by threatening to set fire to the home belonging to D.H.

All in violation of Title 18, United States Code, Sections 2 and 875(c).

A TRUE BILL.

Dated: September 25, 2019

s/Foreperson\_\_\_\_\_

FOREPERSON

s/ Anthony W. Mattivi, #17082 for

STEPHEN R. MCALLISTER

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District of Kansas

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Ks. S. Ct. No. 15845

(It is requested that trial of the above captioned case be held in Topeka, Kansas.)

**PENALTIES:**

Cts. 1 & 2: 18 U.S.C. § 842(p)

- NMT 20 Years Imprisonment,
- NMT \$250,000 Fine,
- NMT 5 Years Supervised Release, and
- \$100 Special Assessment

Count 3: 18 U.S.C. § 875(c)

- NMT 5 Years Imprisonment,
- NMT \$250,000 Fine,
- NMT 3 Years Supervised Release, and
- \$100 Special Assessment