

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO: 18-14011-CR-ROSENBERG/MAYNARD(s)

18 U.S.C. § 875(c)

18 U.S.C. § 1001(a)(2)

18 U.S.C. § 1512(c)(1)

UNITED STATES OF AMERICA

vs.

CHARLTON EDWARD LA CHASE,

**Defendant.**

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**SUPERSEDING INDICTMENT**

The Grand Jury charges:

**GENERAL ALLEGATIONS**

At times relevant to this Superseding Indictment:

1. The Islamic State of Iraq and al-Sham (“ISIS”) was a terrorist organization based in Iraq and Syria that encouraged its followers to attack the United States through various means, including mass shootings and using vehicles to kill pedestrians.
2. On or about June 12, 2016, claiming to act on behalf of ISIS, Omar Mateen entered Pulse Nightclub in Orlando, Florida, and shot and killed 49 individuals and wounded an additional 53 individuals.
3. On or about October 1, 2017, Stephen Paddock opened fire on a crowd at a music festival in Las Vegas, Nevada, and killed 58 individuals and wounded an additional 851 individuals, an attack for which ISIS later claimed credit.

4. On or about October 31, 2017, claiming to act on behalf of ISIS, Sayfullo Saipov drove a rented pickup truck onto a bike path in New York City, and killed eight individuals and wounded an additional eleven individuals.

5. Defendant **CHARLTON EDWARD LA CHASE** was a deaf and mute citizen of the United States and resident of Ft. Pierce, Florida, who traveled to Honduras, Nicaragua, and Costa Rica.

6. On or about March 8, 2015, ISIS released a video in which a pair of disabled militants use sign language in an attempt to recruit deaf and mute fighters for the terrorist organization.

7. The Federal Bureau of Investigation (“FBI”) was an agency of the United States Department of Justice, within the executive branch of the Government of the United States, responsible for investigating crimes of international terrorism and domestic terrorism.

**COUNT 1**  
**Transmitting Threats Through**  
**Interstate and Foreign Communications**  
**(18 U.S.C. § 875(c))**

The General Allegations of paragraphs 1 through 6 are re-alleged in Count 1 of this Superseding Indictment as though fully set forth therein.

On or about January 23, 2018, in Saint Lucie County, in the Southern District of Florida, and elsewhere, the defendant,

**CHARLTON EDWARD LA CHASE,**

did knowingly transmit in interstate and foreign commerce from Nicaragua to Florida a communication containing a true threat to injure the person of others known and unknown to the Grand Jury, in that he sent a text message that stated, “I EANT SHOOT YOU AND PEOPLE DEAD. FUCK YOU. KILL AND SUPPORT ISIS TERRORISM. FUCK YOU. FUCK YOU.”

with the intent to communicate a true threat and with the knowledge that it would be viewed as a true threat, in violation of Title 18, United States Code, Section 875(c).

**COUNT 2**  
**Transmitting Threats Through**  
**Interstate and Foreign Communications**  
**(18 U.S.C. § 875(c))**

The General Allegations of paragraphs 1 through 6 are re-alleged in Count 2 of this Superseding Indictment as though fully set forth therein.

On or about January 23, 2018, in Saint Lucie County, in the Southern District of Florida, and elsewhere, the defendant,

**CHARLTON EDWARD LA CHASE,**

did knowingly transmit in interstate and foreign commerce from Nicaragua to Florida a communication containing a true threat to injure the person of others known and unknown to the Grand Jury, in that he sent a text message that stated, "Fuck you. I prepare to get a rent truck flatbed. Hit / kill people while festive event by Isis terrorism group told me. I been planning to be the first deaf ISIS. KILL PEOPLE LIKE NYC. DR GUY HIT / killed people...Fuck you. Isis want make all deaf community and hearing people pay attention any news about me. First deaf terrorism history in USA. Like Las Vegas Man shoot over 500. Omar marten shooter over 100 lgbt. Fuck you.," with the intent to communicate a true threat and with the knowledge that it would be viewed as a true threat, in violation of Title 18, United States Code, Section 875(c).

**COUNT 3**  
**Transmitting Threats Through**  
**Interstate and Foreign Communications**  
**(18 U.S.C. § 875(c))**

The General Allegations of paragraphs 1 through 6 are re-alleged in Count 3 of this Superseding Indictment as though fully set forth therein.

On or about January 24, 2018, in Saint Lucie County, in the Southern District of Florida, and elsewhere, the defendant,

**CHARLTON EDWARD LA CHASE,**

did knowingly transmit in interstate and foreign commerce from Nicaragua to Florida a communication containing a true threat to injure the person of others known and unknown to the Grand Jury, in that he sent a text message that stated, "I AN GONNA TO SHOOT YOU AND TRUCK HIT YOU KILLED. ISIS.," with the intent to communicate a true threat and with the knowledge that it would be viewed as a true threat, in violation of Title 18, United States Code, Section 875(c).

**COUNT 4**  
**Making False Statements**  
**(18 U.S.C. § 1001(a)(2))**

The General Allegations of paragraphs 1 through 7 are re-alleged in Count 4 of this Superseding Indictment as though fully set forth therein.

On or about February 4, 2018, in Broward County, in the Southern District of Florida, in a matter within the jurisdiction of the FBI, an agency of the executive branch of the Government of the United States, the defendant,

**CHARLTON EDWARD LA CHASE,**

did knowingly and willfully make a false, fictitious, and fraudulent statement and representation as to a material fact, in that the defendant represented to an agent of the FBI that his cellular telephone had been stolen when in truth and in fact, as the defendant then and there well knew, his cellular telephone had not been stolen, in violation of Title 18, United States Code, Section 1001(a)(2).

It is further alleged that this false, fictitious, and fraudulent statement and representation involved "international or domestic terrorism," as defined in Title 18, United States Code, Section 2331.

**COUNT 5**  
**Obstructing Justice**  
**(18 U.S.C. § 1512(c)(1))**

The General Allegations of paragraphs 1 through 7 are re-alleged in Count 5 of this Superseding Indictment as though fully set forth therein.

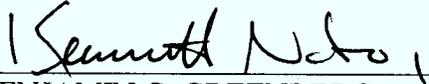
On or about February 4, 2018, at a place outside the United States, that is, Costa Rica, with Broward County, in the Southern District of Florida, being the district where the defendant was arrested, the defendant,

**CHARLTON EDWARD LA CHASE,**

did corruptly alter, destroy, mutilate, and conceal a record, document, and other object, that is, a cellular telephone and its contents, with the intent to impair the object's integrity and availability for use in an official proceeding, in violation of Title 18, United States Code, Section 1512(c)(1).

A TRUE BILL

\_\_\_\_\_  
FOREPERSON

  
\_\_\_\_\_  
BENJAMIN G. GREENBERG  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
ROLANDO GARCIA  
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No: 18-14011-CR-Rosenberg/Maynard (s)

UNITED STATES OF AMERICA

v.

CHARLTON EDWARD LA CHASE,

Defendant.

\_\_\_\_\_ /

**CRIMINAL COVER SHEET**

1. Did this matter originate from a matter pending in the Miami Office of the United States Attorney's Office prior to July 20, 2008?

\_\_\_\_\_ Yes       X  No

2. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office (West Palm Beach Office) only prior to December 18, 2011?

\_\_\_\_\_ Yes       X  No

3. Did this matter originate from a matter pending in the Fort Pierce Office of the United States Attorney's Office prior to August 8, 2014?

\_\_\_\_\_ Yes       X  No

Respectfully submitted,

BENJAMIN G. GREENBERG  
UNITED STATES ATTORNEY

By *Rolando Garcia*  
for Rolando Garcia  
Assistant United States Attorney  
Florida Bar No. 763012  
United States Attorney's Office  
500 S. Australian Avenue, Suite 400  
West Palm Beach, FL 33401

UNITED STATES OF AMERICA

CASE NO. 18-14011-CR-Rosenberg/Maynard (s)

v.

**CERTIFICATE OF TRIAL ATTORNEY\***

**CHARLTON EDWARD LA CHASE,**  
**Defendant.**

**Superseding Case Information:**

**Court Division:** (Select One)

       Miami             Key West  
       FTL             WPB      X   FTP

New Defendant(s) \_\_\_\_\_ No   X    
Number of New Defendants \_\_\_\_\_  
Total number of counts   5  

I do hereby certify that:

- I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
- I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.
- Interpreter: (Yes or No)   Yes    
List language and/or dialect   American Sign Language
- This case will take   5   days for the parties to try.
- Please check appropriate category and type of offense listed below:

(Check only one)		(Check only one)	
I	0 to 5 days	<u>  X  </u>	Petty
II	6 to 10 days	_____	Minor
III	11 to 20 days	_____	Misdem.
IV	21 to 60 days	_____	Felony
V	61 days and over	_____	<u>  X  </u>

6. Has this case been previously filed in this District Court? (Yes or No)   Yes    
 If yes:  
 Judge:   Rosenberg   Case No.   18-14011-CR-Rosenberg/Maynard    
 (Attach copy of dispositive order)  
 Has a complaint been filed in this matter? (Yes or No)   Yes    
 If yes:  
 Magistrate Case No.   18-mj-00008-Maynard    
 Related Miscellaneous numbers: \_\_\_\_\_  
 Defendant(s) in federal custody as of   02/04/2018    
 Defendant(s) in state custody as of \_\_\_\_\_  
 Rule 20 from the District of \_\_\_\_\_  
 Is this a potential death penalty case? (Yes or No)   No  

- Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to October 14, 2003? Yes \_\_\_\_\_ No   X
- Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to September 1, 2007? Yes \_\_\_\_\_ No   X

*Rolando Garcia*  
 Rolando Garcia  
 ASSISTANT UNITED STATES ATTORNEY  
 FL Bar No. 763012

\*Penalty Sheet(s) attached

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**PENALTY SHEET**

No: 18-14011-CR-Rosenberg/Maynard (s)

Defendant's Name: **Charlton Edward La Chase**

<b>COUNT(S)</b>	<b>VIOLATION</b>	<b>U.S. CODE</b>	<b>MAX. PENALTY*</b>
1-3	Transmitting Threats Through Interstate and Foreign Communications	18:875(c)	5 Years' Imprisonment
4	Making False Statements	18:1001(a)(1)	5 Years' Imprisonment
5	Obstructing Justice	18:1512(c)(1)	5 Years' Imprisonment

\*Refers only to possible term of incarceration. Does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.